



SPRAGUE & SPRAGUE

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Attorneys for Plaintiff

**IN THE COURT OF COMMON PLEAS OF CENTRE COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW**

GARY C. SCHULTZ	:	
	:	
Plaintiff,	:	
	:	
v.	:	No. 2012-4623
	:	
CYNTHIA A. BALDWIN, ESQUIRE	:	
Defendant.	:	

**OBJECTION TO TERMINATION OF
THE CASE AND INTENTION TO PROCEED**

TO THE PROTHONOTARY:

Pursuant to the January 18, 2016 Notice of Proposed Termination of this case for docket inactivity, plaintiff Gary C. Schultz files the instant Objection to Termination of the Case and Intention to Proceed.

The reason for docket inactivity is that there is a pending criminal case in the Court of Common Pleas of Dauphin County, Pennsylvania, Commonwealth of Pennsylvania v. Gary Charles Schultz, No. CP-22-MD-1375-2011. This case should await the disposition of the criminal case. After service upon defendant of plaintiff's Writ of Summons in this matter, no further action has been taken by either party while the above-referenced criminal case is ongoing. If the Court would like plaintiff to file a formal motion for a stay of the proceedings in this matter, plaintiff will do so.

Respectfully submitted,

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Thomas A. Sprague (Pa I.D. No. 34716)

Dated: February 19, 2016

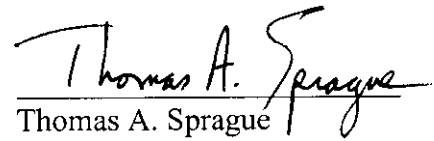
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2016 FEB 23 AM 10:10
CENTRE COUNTY, PA

CERTIFICATE OF SERVICE

I, Thomas A. Sprague, hereby certify that a true and correct copy of the foregoing document has been served by First-Class mail, postage prepaid on the following individual on the date indicated below:

Charles A. De Monaco, Esquire
Fox Rothschild, LLP
625 Liberty Avenue
29th Floor
Pittsburgh, PA 15222-3115

Dated: February 19, 2016


Thomas A. Sprague