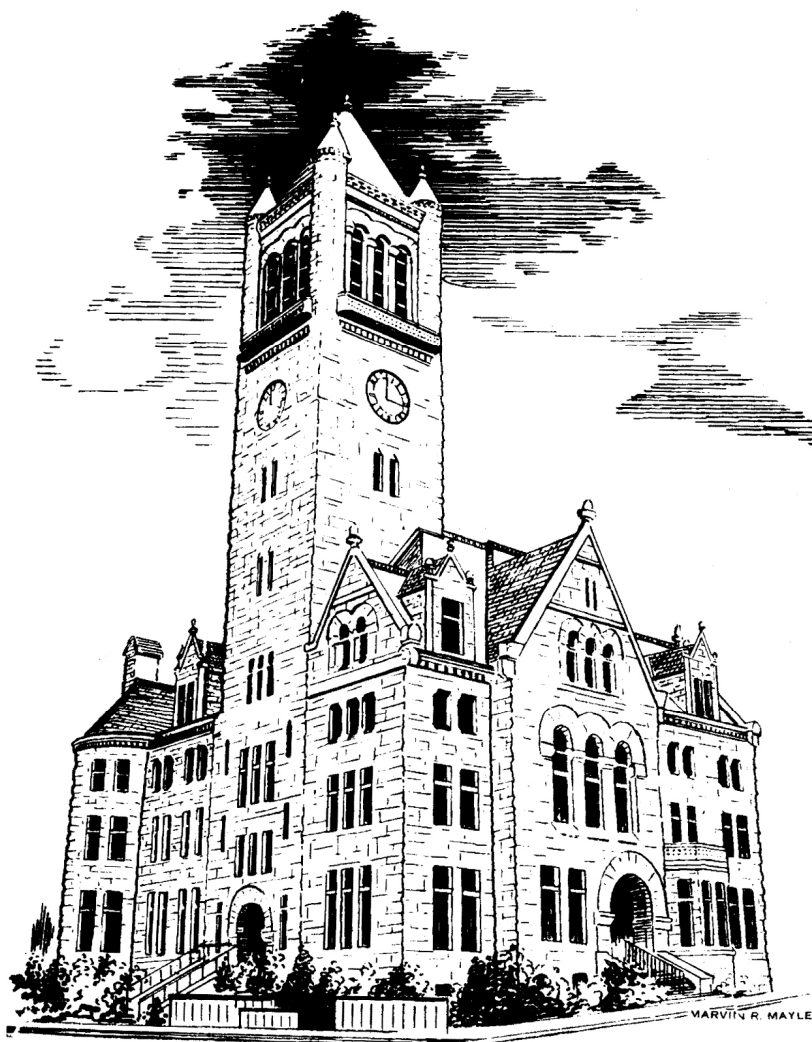


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ESTATE NOTICES

Notice is hereby given that letters testamentary or of administration have been granted to the following estates. All persons indebted to said estates are required to make payment, and those having claims or demands to present the same without delay to the administrators or executors named.

Third Publication

JAMES D. HAGER, late of Georges Township, Fayette County, PA (3)

Executrix: Susan K. Wise
c/o Higinbotham Law Offices
68 South Beeson Boulevard
Uniontown, PA 15401
Attorney: James E. Higinbotham, Jr.

DEBORAH JENKINS, late of Nicholson Township, Fayette County, PA (3)

Administrator: Richard S. Jenkins
c/o 51 East South Street
Uniontown, PA 15401
Attorney: Anthony S. Dedola, Jr.

STEPHEN KERMES, late of Farmington, Fayette County, PA (3)

Administrator: Gloria Kermes
P.O. Box 130
Bradford Woods, PA 15015

STEVEN E. KOOSER, late of Bullsken Township, Fayette County, PA (3)

Personal Representative: Cheryl L. Garlick
c/o Watson Mundorff, LLP
720 Vanderbilt Road
Connellsville, PA 15425
Attorney: Timothy J. Witt

WILLIAM K. MORRISON, late of Perry Township, Fayette County, PA (3)

Administrator: Ryan Morrison
400 Federal Street
P.O. Box 257
Perryopolis, PA 15473

HOWARD B. SARVER, JR., late of Henry Clay Township, Fayette County, PA (3)

Administrator: Clifford L. Sarver
408 Sonny Street
Hanover, PA 17331
c/o Elizabeth B. Place, Mette
3401 North Front Street
P.O. Box 5950
Harrisburg, PA 17110
Attorney: Elizabeth B. Place

Second Publication

ELIZABETH A. ACKINCLOSE, a/k/a ELIZABETH ACKINCLOSE, late of Fayette City, Fayette County, PA (2)

Executor: Timothy R. Ackinclose
17930 Garden Lane
Apartment No. 3
Hagerstown, MD 21740
c/o Melenzyer & Agrafiotis, LLC
337 Fallowfield Avenue
Charleroi, PA 15022
Attorney: Thomas P. Agrafiotis

SHIRLEY BABILYA, a/k/a SHIRLEY ANN BABILYA, late of Brownsville Borough, Fayette County, PA (2)

Personal Representative:
Rebecca Lynn Costello
112 Carmichaels St.
Rices Landing, PA 15357
c/o Mitchell Law Office
P.O. Box 122
902 First Street
Hiller, PA 15444
Attorney: Herbert G. Mitchell, III

DAVID RUSSELL BROOKS, SR., a/k/a DAVID R. BROOKS, late of Dunbar Township, Fayette County, PA (2)

Personal Representative: Lisa Brenneman
c/o Higinbotham Law Offices
68 South Beeson Boulevard
Uniontown, PA 15401
Attorney: James E. Higinbotham, Jr.

BETTY J. CERNUSKA, late of Perry Township, Fayette County, PA (2)

Co-Executrices: Judith Ann Thorpe and Pamela Jane Cunningham
c/o Higinbotham Law Offices
68 South Beeson Boulevard
Uniontown, PA 15401
Attorney: James E. Higinbotham, Jr.

LEGAL NOTICES

Notice of Dissolution

Notice is hereby given that the shareholders of PTAK’S FORMAL WEAR, INC., a Pennsylvania corporation, have approved a proposal that the corporation voluntarily dissolve, and the Board of Directors is now engaged in winding up and settling the affairs of the corporation under the provisions of Section 1975 of the Pennsylvania Business Corporation Law of 1988, as amended.

In the Court of Common Pleas of
Fayette County, Pennsylvania.
No. 1492 of 2025, G.D.

In Re: Petition of Jane Scott Hearley
 For change of name to
 Jennie Scott Hearley

To all persons interested, notice is hereby given that an order of said County authorized the filing of said petition and fixed the 24th day of September, 2025 as the time and Fayette County Courthouse, as the place for a hearing, when and where all persons may show cause, if any they have, why the request of the petition should not be granted.

LORI GAY COSSELL, a/k/a LORI G. COSSELL, late of Dunbar Township, Fayette County, PA (2)
Personal Representative: April Brooks
c/o Higinbotham Law Offices
68 South Beeson Boulevard
Uniontown, PA 15401
Attorney: James E. Higinbotham, Jr.

KATHRYN R. HAUTH, late of Washington Township, Fayette County, PA (2)
Executor: John William Gallo
6224 Highview Drive
Rostraver Township, PA 15012
c/o 823 Broad Avenue
Belle Vernon, PA 15012
Attorney: Mark E. Ramsley

First Publication

MARIE LUKACHIK, late of North Union Township, Fayette County, PA (1)
Executrix: Jacqueline Lukachik
110 Meadowview Court
Uniontown, PA 15401
c/o 92 East Main Street, Suite 24
Uniontown, PA 15401
Attorney: Michelle Kelley

STANLEY BERNARD SOBEK, late of Redstone Township, Fayette County, PA (1)
Administratrix: Juliann E. Braddock
535 Pittsburgh Road
Brownsville, PA 15417
c/o 1600 Morrell Avenue
P.O. Box 100
Connellsville, PA 15425
Attorney: Robert R. Harper, Jr.

Registers' Notice

Notice by JEFFREY L. REDMAN, Register of Wills and
Ex-Officio Clerk of the Orphans' Court Division of the Court of Common Pleas

Notice is hereby given to heirs, legatees, creditors, and all parties in interest that accounts in the following estates have been filed in the Office of the Clerk of the Orphans' Court Division of the Court of Common Pleas as the case may be, on the dates stated and that the same will be presented for confirmation to the Orphans' Court Division of Fayette County on

Tuesday, September 2, 2025, at 9:30 A.M.

<u>Estate Number</u>	<u>Estate Name</u>	<u>Accountant</u>
2624-0730	LARRY WAYNE MIKESELL	Lewis Sweitzer, Executor

Notice is also hereby given that all of the foregoing Accounts will be called for Audit on

Monday, September 15, 2025, at 9:30 A.M.

in Courtroom No. 1 of the **Honorable President Judge Steve P. Leskinen** or his chambers, Second Floor, Courthouse, Uniontown, Fayette County, Pennsylvania, at which time the Court will examine and audit said accounts, hear exceptions to same or fix a time therefore, and make distribution of the balance ascertained to be in the hands of the Accountants.

Notice is hereby given to heirs, legatees, creditors, and all parties in interest that accounts in the following estates have been filed in the Office of the Clerk of the Orphans' Court Division of the Court of Common Pleas as the case may be, on the dates stated and that the same will be presented for confirmation to the Orphans' Court Division of Fayette County on

Tuesday, September 2, 2025, at 9:30 A.M.

<u>Estate Number</u>	<u>Estate Name</u>	<u>Accountant</u>
2624-0161	EDWARD MALDOVAN a/k/a EDWARD L. MALDOVAN	James F. Adams, Executor

Notice is also hereby given that all of the foregoing Accounts will be called for Audit on

Monday, September 15, 2025, at 9:30 A.M.

in Courtroom No. 5 of the **Honorable Judge Joseph M. George, Jr.** or his chambers, Third Floor, Courthouse, Uniontown, Fayette County, Pennsylvania, at which time the Court will examine and audit said accounts, hear exceptions to same or fix a time therefore, and make distribution of the balance ascertained to be in the hands of the Accountants.

WARMAN ABSTRACT & RESEARCH LLC

JOHN F. WARMAN

518 Madison Drive

Smithfield, PA 15478

724-322-6529

johnfranciswarman@gmail.com

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JUDICIAL OPINION

IN THE COURT OF COMMON PLEAS OF FAYETTE COUNTY, PENNSYLVANIA
CIVIL DIVISION

SCOTT HARRIS,	:
Plaintiff,	:
v.	:
HUTCHINSON SPORTSMEN'S CLUB and	:
SOUTH UNION TOWNSHIP,	: No. 2405 of 2022
Defendants.	: President Judge Steve P. Leskinen

OPINION AND ORDER

LESKINEN, P.J.

Before the Court are the separate Motions for Summary Judgment filed by Defendants, Hutchinson Sportsman's Club {1} ("Hutchinson") and South Union Township "South Union"). Upon consideration of the respective Motions, Responses, Briefs, Supplemental Briefs, and oral arguments filed or offered by the parties, {2} the Court issues the following Opinion and Order granting both Motions.

On September 7th, 2021, Plaintiff, Scott Harris, decided to take his son's electric bicycle {3} for a ride. It was his first time on the bike, and he had been riding for approximately forty-five minutes in the general area around the Sheepskin Trail and Hutchinson Park in South Union Township, Fayette County, Pennsylvania, when he approached a speed bump {4} in an area of a roadway later identified as "Gun Club Road." Harris was at the far-right side of the road, almost off the pavement, attempting to avoid a "giant hole" when his handlebars turned to the right, his left hand came off the handlebars, and he fell. Harris landed in the gravel of the parking lot adjoining the side of the road and suffered injuries, including fractured bones in both arms.

{1} The Complaint incorrectly identifies Hutchinson Sportsman's Club as Hutchinson Sportsmen's Club.

{2} Pa. R.C.P. 1035.3 requires a party opposing a motion for summary judgment to file a response within thirty days of service of the motion. Though Plaintiff provided his Responses to the two Motions to the Court's chambers and these were considered in rendering this Opinion and Order, they were not filed of record.

{3} Harris described the bicycle as an Ariel Ryder brand electric bike that could be either pedaled manually or powered by an electric battery, and having a top speed of approximately 20 miles per hour.

{4} Though there was some dispute by Rick Vernon, South Union Township Supervisor, as to whether the structure on the road at issue would be considered a "speed bump" by some formal or technical definition, the Court adopts the phrase here for the sake of brevity based on the Merriam-Webster Dictionary definition, "a low raised ridge across a roadway (as in a parking lot) to limit vehicle speed. This usage is not intended to represent any legal conclusion, but rather that the structure, as depicted in Photo D attached to Harris's deposition, shows a raised ridge across the entire width of the roadway that was clearly placed intentionally by the addition of paving material to the surface and is not the result of buckling or heaving."

Summary Judgment

Pursuant to Pa. R.C.P. 1035.2, after the relevant pleadings are closed, but within such time as not to unreasonably delay trial, any party may move for summary judgment in whole or in part as a matter of law. A proper grant of summary judgment requires a record that either shows the material facts are undisputed or contains insufficient evidence of facts to make out a prima facie cause of action and therefore, there is no issue to be submitted to a jury. Rule 1035.2 and Note. The respective Motions for Summary Judgment filed by Hutchinson and South Union both rely on the latter theory, a record with insufficient evidence of facts to support a prima facie cause of action. When a motion for summary judgment is based on insufficient evidence of facts, the adverse party must come forward with sufficient evidence to support the cause of action. If they fail to do so, the moving party is entitled to judgment as a matter of law. *McCarthy v. Dan Lepore & Sons Co., Inc.*, 724 A.2d 938, 940 (Pa. Super. 1998).

The court must examine the record in the light most favorable to the non-moving party and the non-moving party must adduce sufficient evidence on issues essential to its case and on which it bears the burden of proof such that a jury could return a verdict favorable to the non-moving party. *Id.*

Pennsylvania Political Subdivision Tort Claims Act ("PSTCA") {5} and
Public Roads Pursuant to the General Road Law {6}

South Union raises the defense of immunity under the PSTCA, which provides; "Except as otherwise provided in this subchapter, no local agency shall be liable for any damages on account of any injury to a person or property caused by any act of the local agency or an employee thereof or any other person." *Id.* at §8541. The PSTCA then goes on to set forth certain exceptions to governmental immunity, beginning with §8542 (a):

(a) Liability imposed.--A local agency shall be liable for damages on account of an injury to a person or property within the limits set forth in this subchapter if both of the following conditions are satisfied and the injury occurs as a result of one of the acts set forth in subsection (b):

(1) The damages would be recoverable under common law or a statute creating a cause of action if the injury were caused by a person not having available a defense under section 8541 (relating to governmental immunity generally) or section 8546 (relating to defense of official immunity); and

(2) The injury was caused by the negligent acts of the local agency or an employee thereof acting within the scope of his office or duties with respect to one of the categories listed in subsection (b). As used in this paragraph, "negligent acts" shall not include acts or conduct which constitutes a crime, actual fraud, actual malice or willful misconduct.

{5} 42 Pa. C.S.A. §8541, et seq.

{6} Act of June 13th, 1836, P.L. 551, as amended, 36 P.S. §§1761-3588.

Plaintiffs claims against South Union will be barred by governmental immunity unless the Complaint 1) alleges that the injury was caused by an act of a local agency employee which constituted a crime, actual fraud, actual malice, or willful misconduct; or 2) sets forth a cause of action pursuant to §8542, which requires Plaintiff to show both that damages would be recoverable under common law and that the injury occurred under one of the exceptions set forth in §8542(b). *Garrett by Garrett v. Moyston*, 562 A.2d 386, 389 (Pa. Cmwlth. 1989). Plaintiffs Complaint does not explicitly plead any of the exceptions to immunity. Plaintiff specifically denies that he is relying on the "streets" exception in §8542(b)(6) in ¶9 of his Response to South Union's Motion for Summary Judgment. The streets exception only applies when the dangerous condition occurs on a street which is owned by the local agency. *Mylett v. Adamsky*, 591 A.2d 341, 346 (Pa. Cmwlth. 1991).

Plaintiff, in his Brief in Opposition to South Union's Motion for Summary Judgment, does not address any specific exception to governmental immunity. Instead, Plaintiff argues that the area of Gun Club Road at issue would be considered a "public road" for which South Union would be responsible, or in the alternative, that South Union constructively possessed the road.

Townships have no common law power to build, improve, or vacate roads and must strictly comply with the statutory processes for their creation and vacation. *Basinger v. Adamson*, 297 A.3d 10, 19 (Pa. Cmwlth. 2023). Once a public right in a road has been established, it cannot be lost through nonuse or by municipal action not expressly authorized by law. *Breisch v. Locust Mountain Coal Co.*, 110 A. 242, 243 (Pa. 1920). The General Road Law {7}, as originally enacted in 1836, in Sections 1 through 6, vested the authority in the "courts of quarter sessions" to appoint six viewers to view, lay out, and report to the court the advisability of any requested new public road, which upon approval would become a public road.

The Second Class Township Code, enacted in 1933, {8} provided that township road matters were to be governed by the extant General Road Law. That Code was amended in 1947. {9} The amendment divested the "courts of quarter sessions" of original jurisdiction over road matters and transferred authority for determinations previously made by viewers to the township supervisors. In re Vacation of Portion of Tp. Road 164, Lausanne Tp., Carbon County, 518 A.2d 2, 3 (Pa.Cmwlth. 1986). Sections 67304 and 67305 (53 P.S. §67304 and 67305) of the Code set forth the statutory procedure by which township supervisors lay out, open, widen, and vacate public roads within the township. Pursuant to §67308(a), township supervisors have the obligation to keep all "public roads" in repair.

{7} Act of June 13th, 1836, P.L. 551, as amended, 36 P.S. §§1761-3588.

{8} Act of May 1st, 1933, P.L. 103, as amended, 53 P.S. §§65101-67201.

{9} Act of July 10, 1947, P.L. 1481.

There are three relevant methods for establishing the existence of a "public road." *Stewart v. Watkins*, 427 Pa. 557, 558 (Pa. 1967). The first method is by producing court records that show the road was opened under the 1836 General Road Act. The second method (pursuant to §67307), provides that a " ... road which has been used for public travel and maintained and kept in repair by the township for a period of at least twenty-one years is a public road having a right-of-way of thirty-three feet even though there is no public record of the laying out or dedication for public use of the road." {10} The third method of establishing the existence of a public road occurs by prescription, which requires proof of uniform, adverse, continuous use of the road under claim of right by the public for twenty-one years. *Id.* at 559. Once established by any of those three methods, a public road can only be vacated by the procedures set forth in §67304 and 67305.

This is not a subsidiary issue to be taken lightly as part of an argument raised for the first time in a Brief in Opposition to Summary Judgment that is not filed of record. A judicial determination that the section of Gun Club Road at issue is a public road would require South Union to assume all responsibility for the care and maintenance of the road unless the road is vacated by formal proceedings. An action pursuant to 53 P.S. §67307 (the second method of establishing a public road) requires a proceeding pursuant to this section (§67307(b)) that must be pled to allow South Union to prepare a defense. *Podolak v. Tobyhanna Tp. Bd. of Supervisors*, 37 A.3d 1283, 1287 (Pa. Cmwlth.2012). Similarly, a determination based on adverse use would also need to be pled through an appropriate cause of action.

However, even if Plaintiff had included a count against South Union to declare the area of Gun Club Road a public road, the evidence presented here falls far short of that needed to satisfy §67307(b) and (c). At best, the record establishes that South Union patched potholes when they had extra patch available, sometimes plowed that area of road in the winter, and may have occasionally added signage or made other repairs. The Court allowed Plaintiff to request additional time for discovery at the end of oral arguments on the Summary Judgment Motions, and Plaintiff failed to do so. Considering all the evidence on this issue in the light most favorable to Plaintiff, who bears the burden of proof on the public status of the road pursuant to §67307(e), it is not sufficient to establish a public road under the second or third method in *Stewart*.

Plaintiff has failed to explicitly identify an exception to governmental immunity and has not pled a cause of action, nor produced sufficient evidence that would allow this Court to declare the area of Gun Club Road at issue a public road. Each of these flaws is fatal to Plaintiff's case and would independently support the grant of South Union's Motion for Summary Judgment.

{10} Added by 1995, Nov.9, P.L. 350, No. 60, §1, amended, 2008, Oct. 9, P.L. 1520, No. 126, §1. §67307(b) sets forth examples of relevant documentary evidence of public travel or maintenance by a township, including, inter alia, evidence of state liquid Fuels Tax funds received for maintenance, which Township Supervisor Vernon testified the Township does not receive for this section of Gun Club Road.

Duty of Care

A cause of action for negligence requires a plaintiff to demonstrate: 1) a duty of care; 2) the breach of the duty; 3) a causal connection between the conduct and the resulting injury; and 4) actual loss or damage resulting to the plaintiff. *Bowman v. Rand Spear & Assoc., P.C.*, 234 A.3d 848, 860 (Pa. Super. 2020). The duty of a possessor of land towards a third party entering the land depends on whether the third party is a trespasser, a licensee, or invitee. *Updyke v. BP Oil Co.*, 717 A.2d 546, 549 (Pa. Super. 1998). "A trespasser is one who enters the land of another without any right to do so or who goes beyond the rights and privileges which he or she has been granted by license of invitation." *Oswald v. Hausman*, 548 A.2d 594, 599 (Pa. Super. 1988). In general, a possessor's duty to a trespasser is to refrain from willfully or wantonly injuring the trespasser. In determining whether a party is a trespasser, it is immaterial whether the party knows or should know that he is not entitled to enter upon the property. *Kopka v. Bell Telephone Co. of Pa.*, 371 Pa. 444,450 (Pa. 1952).

A licensee enters solely for his own purposes by invitation extended to him either by express consent or by general or local custom, rather than entry for the business or social purposes of the possessor. *Oswald*, at 599. An invitee is either a public invitee, meaning one who is invited to enter or remain on land as a member of the public for a purpose for which the land is held open to the public, or a business visitor, meaning one who is invited to enter or remain on land for a purpose directly or indirectly connected with the business dealings of the possessor of the land. *Updyke*, at 549. The difference between a licensee and an invitee lies in the distinction between an invitation and permission: an invitation is conduct which justifies others in believing that the possessor desires them to enter the land; permission is conduct which justifies others in believing that the possessor is willing that they enter if they so desire. *Id.*

Here, there are sufficient facts not in dispute for the Court to determine Plaintiffs status as a matter of law. The section of Gun Club Road in question has a "no trespassing" sign along the road, though Plaintiff had not yet reached or passed the sign at the time of his accident. Harris admitted in his deposition that he knew the Sportsman's Club was a private club and he was not a member, and that he saw the sign as he began to ride through the Gun Club property and was about to turn around at the time the accident occurred. (Harris Deposition pp. 84-85.) Harris also testified that the day of the accident was a bright and sunny day and that he saw the speed bump and holes in the road before he attempted to ride over them and, in fact, steered towards the right side of the road where he "avoided the deepest part of it." (*Id.*, pp. 35, 54-55.) Under the aforesaid circumstances, Harris was a trespasser for the purpose of determining the duty of care owed him in a negligence action. He was on private property and admitted that he was aware of that status at the moment the accident occurred. Therefore, Hutchinson would only to be liable to Harris for wanton or willful negligence or misconduct, and Harris has not produced any evidence in his Response to Hutchinson's Motion for Summary Judgment upon which this Court could find such extreme negligence or misconduct.

Even if the Court found that Harris was a licensee rather than a trespasser at the time of the accident (as he was clearly not a public invitee), the result would be the same. A possessor of land is liable for bodily harm to a licensee for a natural or artificial

condition on the land only if he a) knows of the condition, realizes it involves an unreasonable risk, and has reason to believe that the licensee will not discover the condition or realize the risk, and b) invites or permits them to enter or remain upon the land without exercising reasonable care to 1) make the condition reasonably safe, or 2) to warn them of the condition and the risk involved therein. Oswald, at 599. The liability to a licensee is not based upon a duty to maintain the land in a safe condition but rather on the duty to disclose the risk they will encounter if they accept his invitation or permission.

Harris's deposition testimony does not establish whether he lost control of the bike due to the speed bump or due to a pothole in the road near the speed bump:

Attorney Collura: Why did you want [your son] to take pictures of the painted speed bumps?

Harris: Because I believe that, where I crashed, was a disintegrated speed bump, and I wanted to show the difference. I was like, "Hey, take a picture of those while we are here."

Q. Well, did you -you have talked about a speed bump and you have talked about a hole; did you -did your bike contact a speed bump or a hole or something different at the time that you lost control?

A. Whatever you want to call it, whether I hit the hole, speed bump, depression, buckle, crevice; whatever you want to call it.

Q. So whatever it was, is it fair to say it was something that was below the grade of the ground as opposed to -and I'm asking for a distinction because a speed bump makes you think something that goes up and over the grade of the ground.

A. Well, yeah. Well, it-yeah, okay.

Q. Did you pass over any painted speed bumps during your ride?

A. I don't know. Probably; don't know. Don't know.

Q. My question is, if this speed bump that you have been talking about being involved in your accident, if that had been painted, would that have made any difference about what you did or where you went at the time?

[Objection as to form.]

A. You can't paint a hole.

Harris has not cited any evidence in the record to show that Hutchinson knew of the condition, realized it involved an unreasonable risk and had reason to believe that the condition would not be discovered or that a person would not realize the risk. On the contrary, the conditions in the road (both the hole and the speed bump) were clearly visible; Harris admitted that he saw them and steered toward the right-hand side of the road to avoid the deepest part of the hole. Further, Plaintiff has not established in the

record that the speed bump was a dangerous condition, or if, in fact, the speed bump was even the actual cause of Harris's accident, as a speed bump is typically used as a safety measure to slow down traffic.

Bicycling on a roadway carries certain known risks, and riding an unfamiliar electric power assisted bike on a roadway arguably carries additional risks due to the higher speeds possible and additional complexity in operating the bike. Encountering potholes and speed bumps are reasonably foreseeable conditions and risks a bicyclist may expect to encounter. There are valid public policies precluding recovery against injuries incurred through known risks. *Vinikoor v. Pedal Pennsylvania, Inc.*, 974 A.2d 1233, 1240 (Pa. Cmwlth. 2009). Therefore, even if the Court were to consider Harris a licensee at the time of the accident, Plaintiff has still failed to establish liability on Hutchinson's part.

WHEREFORE, the Court issues the following Order:

ORDER

AND NOW, this 17th day of July, 2025, upon consideration of the separate Motions for Summary Judgment filed by Defendant, Hutchinson Sportsman's Club {11}, and Defendant, South Union Township, the Court hereby ORDERS and DIRECTS that both Motions are hereby GRANTED, for the reasons set forth in the accompanying Opinion.

Judgment is entered in favor of Hutchinson Sportsman's Club and South Union Township and against Plaintiff, Scott Harris. All claims asserted by all parties against Hutchinson Sportsman's Club and South Union Township are hereby DISMISSED, with prejudice.

BY THE COURT:
STEVE. P. LESKINEN,
PRESIDENT JUDGE

ATTEST:
PROTHONOTARY

{11} The Complaint incorrectly identifies Hutchinson Sportsman's Club as Hutchinson Sportsmen's Club.

LUNCH & LEARN SERIES

The Fayette County Bar Association's next presentation in its Lunch & Learn Series will be:

- Date: **Wednesday, September 17th** from **12:00 p.m. to 1:30 p.m.**
- Location: **Fayette County Courthouse - Courtroom Four**
- Discussion topic: **The Criminal Arena: New Cases; Old Issues**
- Presenter: **Bruce A. Antkowiak, J.D., LL.D.**

CLE Credit

1.5 hours of Substantive CLE credit for the program. The fees are as follows:

Members of the FCBA

- \$5 fee for attendance without CLE Credit
- \$15 fee for attendance with CLE Credit

Attorneys admitted to practice in Pennsylvania after January 1, 2020

- \$5 fee for attendance with CLE Credit

Non-members of the FCBA

- \$15 fee for attendance without CLE Credit
- \$40 fee for attendance with CLE Credit

**** All fees to be paid at the door ****
Lunch will be provided.

RSVP

If interested in attending, please call Cindy at the Bar office at 724-437-7994 or email to cindy@fcbar.org on or before Monday, September 15th.

BENCH BAR CONFERENCE

SAVE THE DATE

FCBA Bench Bar Conference will be held on

Wednesday, October 22nd from
8:30 a.m. to 1:00 p.m. at

The Historic Summit Inn

Agenda to follow