Gebhard & Co., Inc. V. Hershey Volunteer Fire Company

In July 2008, Gebhard & Co. Filed A Breach Of Contract Complaint Against The Hershey Volunteer Fire Company Demanding $41,916 In Alleged Unpaid Premiums In Lebanon County, Pennsylvania. (Case No. 2008-0-1592, *Gebhard & Co., Inc. V. Hershey Volunteer Fire Company*, Lebanon County Prothonotary, Filed 7/25/08)

GEBHARD & CO., INC. d/b/a HOASTER GEBHARD & CO., Plaintiff	: IN THE COURT OF COMMON PLEAS : LEBANON COUNTY, PENNSYLVANIA : CIVIL ACTION
vs.	:
	: NO.
HERSHEY VOLUNTEER FIRE COMPANY, Defendant	:

COMPLAINT

AND NOW COMES Gebhard & Co., Inc. d/b/a Hoaster Gebhard & Co., by and through its attorneys, Greer H. Anderson and Weiss, Weiss & Weiss, who files this Complaint against Defendant, averring as follows:

1. Gebhard & Co., Inc. d/b/a Hoaster Gebhard & Co. ("Hoaster Gebhard") is a registered Pennsylvania corporation doing business at 719 Quentin Road, Lebanon, PA 17042.

2. The Hershey Volunteer Fire Company ("Hershey") is a registered Pennsylvania non-profit business, with its principal operating address at 21 West Caracus Avenue, Hershey, PA 17033.

3. Hoaster Gebhard is in the business of providing insurance brokerage services to private individuals and businesses.

4. Hershey is in the business of providing fire and other emergency response services to the Hershey Community.

5. On or about July 5, 2007, Hershey contacted Hoaster Gebhard to secure commercial insurance to cover Hershey's organization.

6. Upon Hershey's request, Hoaster Gebhard secured insurance for Hershey.

7. Pursuant to the terms of the agreement, Hoaster Gebhard agreed to advance the premium for the insurance policies in a total amount of $41,916.00. In exchange, Hershey agreed to pay Hoaster Gebhard for those premiums.

8. Pursuant to the terms of the agreement, Hoaster Gebhard paid such premiums in the amount of $41,916.00.

9. Despite repeated requests for payment, Hershey failed and refused to pay the premiums in the amount of $41,916.00.

(Case No. 2008-0-1592, *Gebhard & Co., Inc. V. Hershey Volunteer Fire Company*, Lebanon County Prothonotary, Filed 7/25/08)