

00-109-CD
SEARS, ROEBUCK AND COMPANY -vs- KARA A. KRAMER

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

(initials)
SEARS, ROEBUCK AND COMPANY,
Plaintiff

CIVIL DIVISION

vs.

No.

00-109-60

(initials)
KARA A. KRAMER,
Defendant

COMPLAINT IN REPLEVIN

Filed on behalf of Plaintiff, Sears,
Roebuck and Company.

Counsel of Record for this party:

Paul V. Ressler, Esquire
PA I.D. #25626

FIRM No. 739

21 Yost Boulevard, Suite 301
Forest Hills, PA 15221-5283
(412) 824-6944

FILED

JAN 31 2000

William A. Shaw
Prothonotary

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

SEARS, ROEBUCK & COMPANY, :
Plaintiff, :
vs. : No.
KARA A. KRAMER, :
Defendant. :
:

NOTICE TO DEFEND

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claimed in the Complaint or for any claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

**YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE.
IF YOU DO NOT HAVE OR KNOW A LAWYER, THEN YOU SHOULD
GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO
FIND OUT WHERE YOU CAN GET LEGAL HELP.**

*LAWYER REFERRAL SERVICE
RAYMOND L. BILLOTTE, COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
1 NORTH SECOND STREET
CLEARFIELD, PA 16830
TELEPHONE: 814-765-2641*

COMPLAINT IN REPLEVIN

AND NOW, comes the plaintiff, SEARS, ROEBUCK & COMPANY, by and through its attorneys, RESSLER & RESSLER, P.C. and PAUL V. RESSLER, ESQUIRE, and makes the following statement:

1. The plaintiff, SEARS, ROEBUCK & COMPANY, is a corporation existing under the laws of the State of New York and authorized to do business in the Commonwealth of Pennsylvania.

2. The defendant, KARA A. KRAMER, is an adult individual who resides at PO Box 15, Lawrence Avenue, Hyde, Clearfield County, Pennsylvania 16843-0015.

3. The defendant purchased a Sony 32" television, Sony VCR and a Canon Fax , and charged same to Sears Account No. 03 63505 87928 0.

4. Plaintiff believes, and therefore avers, that the items described above are in the possession of defendant at her above residence address.

6. The balance of the account in the sum of \$2,209.99 was discharged in bankruptcy and Plaintiff seeks no personal liability against defendant in this action. The bankruptcy case is closed and there is no stay in effect.

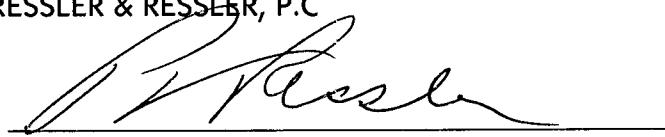
7. Defendant neither reaffirmed, redeemed, nor returned the items described above in the bankruptcy action.

8. Plaintiff holds a purchase money security interest in the aforesaid merchandise pursuant to the Pennsylvania Uniform Commercial Code, 13 Pa. C.S.A. Section 9302(a)(4), as evidenced by Exhibit "A" attached hereto and incorporated herein.

WHEREFORE, Plaintiff prays this Honorable Court to enter judgment in favor of Plaintiff for possession of the aforesaid item, i.e. Sony 32" television, Sony VCR and a Canon Fax.

Respectfully submitted,
RESSLER & RESSLER, P.C

BY:


Paul V. Ressler, Esquire
Attorney for Plaintiff
Sears, Roebuck and Company

**IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION**

SEARS, ROEBUCK AND COMPANY, :
Plaintiff, :
vs. :
KARA A. KRAMER, :
Defendant. : Docket No.

VERIFICATION

The undersigned, CARMEN PINA GAY _____, is an authorized agent of the plaintiff and
verifies that the facts set forth in this complaint are true and correct to the best of my
knowledge, information, and belief. This statement is made subject to the penalties of Section
4904 of the Crimes Code (18 P.A.S.C.A. § 4904) related to unsworn falsification to authorities.

Respectfully submitted,

Sears, Roebuck & Company

By:

Carmen Pina Gay
Authorized Agent
Bankruptcy Process Manager, Plaintiff

SEARS
45 Congress Street
Salem, MA 01970

TIME: 08:32PM

SEARS
DUBOIS, PA 21246

RETAIN FOR COMPARISON WITH MONTHLY
STATEMENT OR FOR RETURN OR EXCHANGE

CUSTOMER: KARA A. KRAMER

PICK UP DATE: 11/07/97

TRAN#	PG/STORE	REG#	ASSOC#
3153	10 02124	057	3202
MERCHANDISE HOLDING			
CUSTOMER PICKUP			
2057	45046	TV SNY 32" MDS	799.99T
SALE CREDIT 10% 80.00T-			
SUBTOTAL 719.99			
TAX 06.000% 43.20			
CARD TYPE: SEARS ACCOUNT			
ACCT #: W0363505879280/001/000			
STATE: PA			
DELAYED DATE: 05/07/98			
DELAY REASON: PROMOTIONAL			
11/07/97	DELAYED TOTAL 763.19		

PURCHASED UNDER MY SEARS ACCOUNT AND
SECURITY AGREEMENT, INCORPORATED BY
REFERENCE. I GRANT SEARS A SECURITY
INTEREST IN THIS MERCHANDISE UNTIL
PAID, UNLESS PROHIBITED BY LAW.
\$763.19

Kara A. Kramer

PURCHASED BY

PICK UP NUMBER 3153

SALES CHECK #
021240573153

SATISFACTION GUARANTEED
OR YOUR MONEY BACK

EXHIBIT "A"

TIME: 03:30PM

S E A R S

ALTOONA, PA 24943

RETAIN FOR COMPARISON WITH MONTHLY
STATEMENT OR FOR RETURN OR EXCHANGE

CUSTOMER: KARA A. KRAMER

TRAN#	PG/STORE	REG#	ASSOC#
0209	10	02494	157
			349

S A L E

057	55437991	VCR, SLV775 CLR	199.97T
		SUBTOTAL	199.97
		TAX 06.000%	12.00

CARD TYPE: SEARS ACCOUNT
ACCT #: W0363505879280/000/000
02/15/98 SEARS ACCOUNT TOTAL 211.97

PURCHASED UNDER MY SEARS ACCOUNT AND
SECURITY AGREEMENT, INCORPORATED BY
REFERENCE. I GRANT SEARS A SECURITY
INTEREST IN THIS MERCHANDISE UNTIL
PAID, UNLESS PROHIBITED BY LAW.
\$211.97

Kara A. Kramer

PURCHASED BY

CALL FOR INFORMATION:

DELIVERY	(814)940-2253
PARTS	(814)940-2282
INSTALLATION	(814)940-2200
SERVICE	(800)473-7247

S A L E S C H E C K #
0 2 4 9 4 1 5 7 0 2 0 9

SATISFACTION GUARANTEED
OR YOUR MONEY BACK

TIME: 12:55PM

SEARS
DUBOIS, PA 21246

RETAIN FOR COMPARISON WITH MONTHLY
STATEMENT OR FOR RETURN OR EXCHANGE

CUSTOMER: KARA A. KRAMER

TRAN#	PG/STORE	REG#	ASSOC#
2904	10 02124	901	1230
S A L E			
03 58707	FAX,B640 I MDS	299.99T	
	SUBTOTAL	299.99	
	TAX 06.000%	18.00	
	CHECK/DEPOSIT	37.99	-

CARD TYPE: SEARS ACCOUNT
ACCT #: W0363505879280/000/000
STATE: PA /0
03/13/98 SEARS ACCOUNT TOTAL 280.00

THANK YOU FOR BEING A
SEARS BEST CUSTOMER

AND FOR USING YOUR SEARS CARD

PURCHASED UNDER MY SEARS ACCOUNT AND
SECURITY AGREEMENT, INCORPORATED BY
REFERENCE. I GRANT SEARS A SECURITY
INTEREST IN THIS MERCHANDISE UNTIL
PAID, UNLESS PROHIBITED BY LAW.

\$280.00



PURCHASED BY

S A L E S C H E C K #
0 2 1 2 4 9 0 1 2 9 0 4

SATISFACTION GUARANTEED
OR YOUR MONEY BACK

NPJ28203 - 32 NPS - Display/Update Service Merchandise Items 12/22/99
KARA KRAMER (814) 765-6876 Loc: 1 ET: CC:H

To update, modify the info below otherwise, type action code and press Enter.

Action code (1=Audit information 2=Item agreement

3=Create on-site SO 4=Create shop SO)

Mdse code : FACSIMILE1YR Type: Mdse desc : B640 INKJET

Brand . . . CANON

Sears purchase Y (Y/N)

Purch date 03 13 1998 Install/receipt date 03 13 1998 Reason

Model # . . 705B640 Serial # . .

Purch loc 0002124 (unit #)

Usage type R (R=Residential C=Coml) Last pitch:

Promote MA Y Reason Promote other Y Reason

Warranty Expires (mm dd ccyy) Reason Length (# M/D/Y)

Labor 03 13 1999 1 Y

Parts 03 13 1999 1 Y

Excep parts 03 13 1999 1 Y

Latest SP: Plan: Exp: # additional SP:

Enter F1=Help F3=Exit F12=Prev screen

NPJ28203 - 32 NPS - Display/Update Service Merchandise Items 12/22/99
KARA KRAMER (814) 765-6876 Loc: 1 ET: CC:H

To update, modify the info below otherwise, type action code and press Enter.

Action code (1=Audit information 2=Item agreement
3=Create on-site SO 4=Create shop SO)

Mdse code : TV3032IN90D Type: Mdse desc : TV KV32S22, SNY 32" CLR
Brand . . . SONY
Sears purchase Y (Y/N)

Purch date 11 07 1997 Install/receipt date 11 07 1997 Reason
Model # . . 474KV32S22 Serial # . .

Purch loc 0002124 (unit #)

Usage type R (R=Residential C=Coml) Last pitch:

Promote MA Y Reason Promote other Y Reason

Warranty Expires (mm dd ccyy) Reason Length (# M/D/Y)

Labor 02 05 1998 90 D

Parts 11 07 1998 1 Y

Excep parts 11 07 1999 2 Y

Latest SP: Plan: Exp: # additional SP:

Enter F1=Help F3=Exit F12=Prev screen

NPJ28203 - 32 NPS - Display/Update Service Merchandise Items 12/22/99
KARA KRAMER (814) 765-6876 Loc: 1 ET: CC:H

To update, modify the info below otherwise, type action code and press Enter.

Action code (1=Audit information 2=Item agreement
3=Create on-site SO 4=Create shop SO)

Mdse code : VCROV24990D Type: Mdse desc : VCR, SLV775HF

Brand . . . SONY

Sears purchase Y (Y/N)

Purch date 02 15 1998 Install/receipt date 02 15 1998 Reason

Model # . . . 474SLV775HF Serial # . . .

Purch loc 0002494 (unit #)

Usage type R (R=Residential C=Coml) Last pitch:

Promote MA Y Reason Promote other Y Reason

Warranty Expires (mm dd ccyy) Reason Length (# M/D/Y)

Labor 05 16 1998 90 D

Parts 02 15 1999 1 Y

Excep parts 02 15 1999 1 Y

Latest SP: Plan: Exp: # additional SP:

Enter F1=Help F3=Exit F12=Prev screen

FILED

Sept 31 2000

10/13/00 Cathy Resler
William A. Shaw
Prothonotary
PD \$80.00

ICC Sheriff Service

PAUL V. RESSLER

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

SEARS, ROEBUCK AND COMPANY
VS
KRAMER, KARA A.

00-109-CD

COMPLAINT IN REPLEVIN

SHERIFF RETURNS

NOW MARCH 3, 2000 AFTER DILIGENT SEARCH IN MY BAILIWICK I
RETURN THE WITHIN COMPLAINT IN REPLEVIN "NOT FOUND" AS TO
KARA A. KRAMER, DEFENDANT. SEVERAL ATTEMPTS, UNKNOWN AT THE
POST OFFICE.

18.23 SHFF. HAWKINS PAID BY: ATTY.
10.00 SURCHARGE PAID BY: ATTY.

SWORN TO BEFORE ME THIS

10th DAY OF March 2000
William A. Shaw

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2002
Clearfield Co., Clearfield, PA.

SO ANSWERS,

Chester A. Hawkins
My Manly Name

CHESTER A. HAWKINS
SHERIFF

FILED

MAR 10 2000
013:13 PM
William A. Shaw
Prothonotary *RCB*

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

SEARS, ROEBUCK AND COMPANY,
Plaintiff

CIVIL DIVISION

vs.

No. 00-109-CO

KARA A. KRAMER,
Defendant

COMPLAINT IN REPLEVIN

Filed on behalf of Plaintiff, Sears,
Roebuck and Company.

Counsel of Record for this party:

Paul V. Ressler, Esquire
PA I.D. #25626

FIRM No. 739

21 Yost Boulevard, Suite 301
Forest Hills, PA 15221-5283
(412) 824-6944

I hereby certify this to be a true
and attested copy of the original
statement made in this case.

JAN 31 2000

Attest:

William J. Shan
Prothonotary

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

SEARS, ROEBUCK & COMPANY, :
Plaintiff, :
vs. : No.
KARA A. KRAMER, :
Defendant. :
:

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IF YOU DO NOT HAVE OR KNOW A LAWYER, THEN YOU SHOULD
GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO
FIND OUT WHERE YOU CAN GET LEGAL HELP.**

**LAWYER REFERRAL SERVICE
RAYMOND L. BILLOTTE, COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
1 NORTH SECOND STREET
CLEARFIELD, PA 16830
TELEPHONE: 814-765-2641**

COMPLAINT IN REPLEVIN

AND NOW, comes the plaintiff, SEARS, ROEBUCK & COMPANY, by and through its attorneys, RESSLER & RESSLER, P.C. and PAUL V. RESSLER, ESQUIRE, and makes the following statement:

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2. The defendant, KARA A. KRAMER, is an adult individual who resides at PO Box 15, Lawrence Avenue, Hyde, Clearfield County, Pennsylvania 16843-0015.

3. The defendant purchased a Sony 32" television, Sony VCR and a Canon Fax, and charged same to Sears Account No. 03 63505 87928 0.

4. Plaintiff believes, and therefore avers, that the items described above are in the possession of defendant at her above residence address.

6. The balance of the account in the sum of \$2,209.99 was discharged in bankruptcy and Plaintiff seeks no personal liability against defendant in this action. The bankruptcy case is closed and there is no stay in effect.

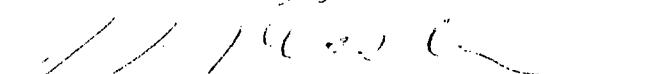
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WHEREFORE, Plaintiff prays this Honorable Court to enter judgment in favor of Plaintiff for possession of the aforesaid item, i.e. Sony 32" television, Sony VCR and a Canon Fax.

Respectfully submitted,
RESSLER & RESSLER, P.C.

BY:


Paul V. Ressler, Esquire
Attorney for Plaintiff
Sears, Roebuck and Company

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

SEARS, ROEBUCK AND COMPANY, :
Plaintiff, :
vs. : Docket No.
KARA A. KRAMER, :
Defendant. :
: 100-1000

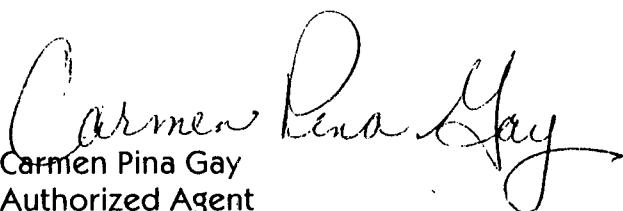
VERIFICATION

The undersigned, CARMEN PINA GAY, is an authorized agent of the plaintiff and
verifies that the facts set forth in this complaint are true and correct to the best of my
knowledge, information, and belief. This statement is made subject to the penalties of Section
4904 of the Crimes Code (18 P.A.S.C.A. § 4904) related to unsworn falsification to authorities.

Respectfully submitted,

Sears, Roebuck & Company

By:


Carmen Pina Gay
Authorized Agent
Bankruptcy Process Manager, Plaintiff

SEARS
45 Congress Street
Salem, MA 01970

TIME: 08:32PM

SEARS
DUBOIS, PA 21246
RETAIN FOR COMPARISON WITH MONTHLY
STATEMENT OR FOR RETURN OR EXCHANGE

CUSTOMER: KARA A. KRAMER

PICK UP DATE: 11/07/97

TRAN#	PG/STORE	REG#	ASSOC#
3153	10 02124	057	3202
M E R C H A N D I S E H O L D I N G			
C U S T O M E R P I C K U P			
2057	45046	TV SNY 32" MDS	799.99T
SALE CREDIT 10% 80.00T-			
SUBTOTAL 719.99			
TAX 06.000% 43.20			

CARD TYPE: SEARS ACCOUNT
ACCT #: W0363505879280/001/000

STATE: PA

DELAYED DATE: 05/07/98

DELAY REASON: PROMOTIONAL

11/07/97 DELAYED TOTAL 763.19

PURCHASED UNDER MY SEARS ACCOUNT AND
SECURITY AGREEMENT, INCORPORATED BY
REFERENCE. I GRANT SEARS A SECURITY
INTEREST IN THIS MERCHANDISE UNTIL
PAID, UNLESS PROHIBITED BY LAW.

\$763.19

Kara A. Kramer

PURCHASED BY

PICK UP NUMBER 3153

SALES CHECK #
021240573153

SATISFACTION GUARANTEED
OR YOUR MONEY BACK

TIME: 03:30PM

S E A R S

ALTOONA, PA 24943

RETAIN FOR COMPARISON WITH MONTHLY
STATEMENT OR FOR RETURN OR EXCHANGE

CUSTOMER: KARA A. KRAMER

TRAN#	PG/STORE	REG#	ASSOC#
0209	10	02494	157
			349

S A L E

057	55437991	VCR, SLV775 CLR	199.97T
		SUBTOTAL	199.97
		TAX 06.000%	12.00

CARD TYPE: SEARS ACCOUNT
ACCT #: W0363505879280/000/000
02/15/98 SEARS ACCOUNT TOTAL 211.97

PURCHASED UNDER MY SEARS ACCOUNT AND
SECURITY AGREEMENT, INCORPORATED BY
REFERENCE. I GRANT SEARS A SECURITY
INTEREST IN THIS MERCHANDISE UNTIL
PAID, UNLESS PROHIBITED BY LAW.

\$211.97

Kara A. Kramer

PURCHASED BY

CALL FOR INFORMATION:

DELIVERY	(814)940-2253
PARTS	(814)940-2282
INSTALLATION	(814)940-2200
SERVICE	(800)473-7247

S A L E S C H E C K #
0 2 4 9 4 1 5 7 0 2 0 9

SATISFACTION GUARANTEED
OR YOUR MONEY BACK

TIME: 12:55PM

SEARS
DUBOIS, PA 21246
RETAIN FOR COMPARISON WITH MONTHLY
STATEMENT OR FOR RETURN OR EXCHANGE

CUSTOMER: KARA A. KRAMER

TRAN#	PG/STORE	REG#	ASSOC#
2904	10 02124	901	1230
S A L E			
03 58707	FAX,B640 I MDS	299.99T	
	SUBTOTAL	299.99	
	TAX 06.000%	18.00	
	CHECK/DEPOSIT	37.99	-

CARD TYPE: SEARS ACCOUNT

ACCT #: W0363505879280/000/000

STATE: PA /0

03/13/98 SEARS ACCOUNT TOTAL 280.00

THANK YOU FOR BEING A
SEARS BEST CUSTOMER

AND FOR USING YOUR SEARS CARD

PURCHASED UNDER MY SEARS ACCOUNT AND
SECURITY AGREEMENT, INCORPORATED BY
REFERENCE. I GRANT SEARS A SECURITY
INTEREST IN THIS MERCHANDISE UNTIL
PAID, UNLESS PROHIBITED BY LAW.

\$280.00



PURCHASED BY

S A L E S C H E C K #
0 2 1 2 4 9 0 1 2 9 0 4

SATISFACTION GUARANTEED
OR YOUR MONEY BACK

NPJ28203 - 32 . NPS - Display/Update Service Merchandise Items 12/22/99
KARA KRAMER (814) 765-6876 Loc: 1 ET: CC:H

To update, modify the info below otherwise, type action code and press Enter.

Action code (1=Audit information 2=Item agreement
3=Create on-site SO 4=Create shop SO)

Mdse code : FACSIMILE1YR Type: Mdse desc : B540 INKJET

Brand . . . CANON

Sears purchase Y (Y/N)

Purch date 03 13 1998 Install/receipt date 03 13 1998 Reason

Model # . . 705B640 Serial # . .

Purch loc 0002124 (unit #)

Usage type R (R=Residential C=Coml) Last pitch:

Promote MA Y Reason Promote other Y Reason

Warranty Expires (mm dd ccyy) Reason Length (# M/D/Y)

Labor 03 13 1999 1 Y

Parts 03 13 1999 1 Y

Excep parts 03 13 1999 1 Y

Latest SP: Plan: Exp: # additional SP:

Enter F1=Help F3=Exit F12=Prev screen

NPJ28203 - 32 NPS - Display/Update Service Merchandise Items 12/22/99
KARA KRAMER (814)765-6876 Loc: 1 ET: CC:H

To update, modify the info below otherwise, type action code and press Enter.

Action code (1=Audit information 2=Item agreement
3=Create on-site SO 4=Create shop SO)
Mdse code : TV3032IN90D Type: Mdse desc : TV KV32S22, SNY 32" CLR
Brand . . . SONY
Sears purchase Y (Y/N)

Purch date 11 07 1997 Install/receipt date 11 07 1997 Reason
Model # . . 474KV32S22 Serial # . .

Purch loc 0002124 (unit #)

Usage type R (R=Residential C=Coml) Last pitch:

Promote MA Y Reason Promote other Y Reason

Warranty Expires (mm dd ccyy) Reason Length (# M/D/Y)

Labor 02 05 1998 90 D

Parts 11 07 1998 1 Y

Excep parts 11 07 1999 2 Y

Latest SP: Plan: Exp: # additional SP:

Enter F1=Help F3=Exit F12=Prev screen

NPJ28203 - 32 NPS - Display/Update Service Merchandise Items 12/22/99
KARA KRAMER (814) 765-6876 Loc: 1 ET: CC:H

To update, modify the info below otherwise, type action code and press Enter.

Action ccode (1=Audit information 2=Item agreement
3=Create on-site SO 4=Create shop SO)

Mdse code : VCROV24990D Type: Mdse desc : VCR, SLV775HF

Brand . . . SONY

Sears purchase Y (Y/N)

Purch date 02 15 1998 Install/receipt date 02 15 1998 Reason

Model # . . . 474SLV775HF Serial # . . .

Purch loc 0002494 (unit #)

Usage type R (R=Residential C=Coml) Last pitch:

Promote MA Y Reason Promote other Y Reason

Warranty Expires (mm dd ccyy) Reason Length (# M/D/Y)

Labor 05 16 1998 90 D

Parts 02 15 1999 1 Y

Excep parts 02 15 1999 1 Y

Latest SP: Plan: Exp: # additional SP:

Enter F1=Help F3=Exit F12=Prev screen

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

(114)
SEARS, ROEBUCK AND COMPANY,
Plaintiff

CIVIL DIVISION

vs.

No. 00-109-CD

(114)
KARA KRAMER,
Defendant

PRAECIPE TO WITHDRAW COMPLAINT

Filed on behalf of Plaintiff, Sears,
Roebuck and Company.

Counsel of Record for this party:

Paul V. Ressler, Esquire
PA I.D. #25626

FIRM No. 739

21 Yost Boulevard, Suite 301
Forest Hills, PA 15221-5283
(412) 824-6944

FILED

APR 05 2000

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
ORPHANS' COURT DIVISION

SEARS, ROEBUCK AND COMPANY, :
Plaintiff, :
VS. : No. 00-109-CD
KARA KRAMER, :
Defendant. :
:

PRAECIPE TO WITHDRAW THE COMPLAINT

To the Prothonotary:

Please withdraw the above captioned Complaint on my behalf of ~~Sears~~ Roebuck and Company, due to not being able to find the Defendant.

Respectfully submitted,

RESSLER & RESSLER, P.C.

BY:


Paul V. Ressler, Esquire
Attorney for Plaintiff
Sears, Roebuck and Company