

00-529-CJ
BOARDWALK REGENCY CORPORATION -vs- RICHARD D. GRAHAM

BOARDWALK REGENCY
CORPORATION,
2100 Pacific Avenue,
Camden City, New Jersey, 08401

Plaintiff

VS.

RICHARD D. GRAHAM,²²⁵
602 W. Dubois Ave. #5
Dubois, Pennsylvania 15801

Defendant

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY

CIVIL ACTION - LAW

NO: 00-529-60

PRAECIPE TO FILE AND INDEX FOREIGN JUDGMENT

TO THE PROTHONOTARY OF CLEARFIELD COUNTY:

Pursuant to the Uniform Enforcement of Foreign Judgments Act 42 Pa. Cons. Stat. §4306, kindly file and index the attached exemplified and certified copies of the docket entries and the Judgment entered in favor of Plaintiff, Boardwalk Regency Corporation, and against Defendant, Richard D. Graham in the total sum of Three Thousand Two Hundred Ninety-four Dollars and three Cents (\$3,294.03) debt, and cost of suit, plus interest and costs in the Superior Court of New Jersey in and for Atlantic County, New Jersey, in an Action captioned Boardwalk Regency Corp. vs. Richard D. Graham, No. DC 003873-98.

Respectfully Submitted,

CARL J. GRECO, P.C.

BY:

CARL J. GRECO, ESQUIRE
Attorney for Plaintiff
CARL J. GRECO, P.C.
Bank Towers Bldg. - 11th Floor
321 Spruce Street
Scranton, PA 18503
(570)346-4434

FILED

MAY 08 2000

William A. Shaw
Prothonotary

COPY

**OFFICE OF THE PROTHONOTARY COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA**

BOARDWALK REGENCY CORP. vs. RICHARD D. GRAHAM

TO: Richard D. Graham
602 W. Dubois Ave. #5
Dubois PA 15801

NOTICE

Pursuant to Rule 236, please be advised that the Court has entered a Judgment in the above-entitled proceeding, and a copy thereof is enclosed. The Creditor in the Action against you is Boardwalk Regency Corp., at 2100 Pacific Avenue, Camden City, New Jersey, 08401, which is represented in this action by Carl J. Greco, P.C., 11th Floor, Bank Towers Building, 321 Spruce St., Scranton PA 18503.

Dated: May 8, 2000

PROTHONOTARY

BOARDWALK REGENCY :
CORPORATION, : IN THE COURT OF COMMON PLEAS
2100 Pacific Avenue, : OF CLEARFIELD COUNTY
Camden City, New Jersey, 08401 :
Plaintiff :
VS. : CIVIL ACTION - LAW
RICHARD D. GRAHAM, :
602 W. Dubois Ave. #5 :
Dubois, Pennsylvania 15801 :
Defendant : NO:

AFFIDAVIT

M. RICHARD SCHEER, ESQUIRE, of full age, being duly sworn according to the law, deposes and says:

1. That I am an attorney at law of the State of New Jersey and employed by Craner, Nelson, Satkin & Scheer, P.C., counsel for the Plaintiff and Judgment Creditor, Boardwalk Regency Corp., in that certain matter before the Superior Court of New Jersey for Atlantic County, New Jersey, which is styled Boardwalk Regency Corp. v. Richard D. Graham and numbered DC-003873-98, and had primary responsibility for representing Boardwalk Regency Corp. in this matter.
2. I am authorized to and do make this Affidavit in support of Boardwalk Regency Corp.'s request for domestication in the Commonwealth of Pennsylvania, of the Order for Final Judgment (the "Judgment") it obtained against Richard D. Graham, the Defendant and the Judgment Debtor in the Atlantic County Action.
3. Boardwalk Regency Corp.'s business street address is 2100 Pacific Avenue, Camden City, New Jersey, 08401.

4. Richard D. Graham's address is 602 W. Dubois Ave. #5, Dubois, Pennsylvania 15801.

5. On June 16, 1998, Boardwalk Regency Corp. filed its Complaint against Richard D. Graham in the Atlantic County Action. On or about June 21, 1998, Richard D. Graham was served with process.

6. On August 18, 1998, a Default Judgment was entered against Richard D. Graham in the amount of \$3,294.03, ^{plus} ~~plus costs~~ and interest.

7. The Judgment remains unsatisfied.

8. In light of the foregoing, the Judgment is valid and enforceable.

Richard Scheer

M. Richard Scheer, Esquire
Attorney for Plaintiff

Sworn to and subscribed

to before me this 6TH
day of JANUARY, 2000

Valerie A. Ziegler

Notary Public

VALERIE A. ZIEGLER
A Notary Public Of New Jersey
My Commission Expires 9/17/2002

SUPERIOR COURT OF NEW JERSEY, LAW DIVISION, SPECIAL CIVIL PART

Atlantic County

Boardwalk Regency Corp.
Plaintiff
vs.
Defendant
Richard D. Graham

DOCKET NO. DC-3873-98
EXEMPLIFIED COPY OF JUDGEMENT

We have inspected the files of The Atlantic County Special Civil Part and have found a certain judgement in the above captioned matter to be as follows:

Judgement in favor of Plaintiff Boardwalk Regency Corporation

and against Defendant Richard D. Graham

Date: 8-18-98

Amount: 3167.67

Costs: 48.00 costs, 78.36 attorney fees, 6.50 exemplified copy

Totals: 3300.53

On this 13th day of January 192000, I hereby certify the foregoing record
to be exemplified, witness, Judge Joseph E. Kane J.S.C.

Presiding Judge of The Atlantic County Special Civil Part, 1201 Bacharach Boulevard in Atlantic City, State of New Jersey.

Teresa Ungaro
Civl/Eq. Division Mgr.

Clerk

BOWK REG CORP
(PLAINTIFF(S))

- VS -

GRAHAM RICHARD
(DEFENDANT(S))

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION-SPECIAL CIVIL PART

ON (CONTRACT)

DOCKET NO. : DC-003873-98
JUDGMENT NO. : VJ-004720-98

>>>> STATEMENT FOR DOCKETING <<<<

CREDITORS ATTORNEY:

ROBERT E. REILERT
2100 PACIFIC AVENUE
ATLANTIC CITY NJ 08401

JUDGMENT IN THE ABOVE ENTITLED CAUSE WAS ENTERED IN THE ATLANTIC COUNTY SPECIAL CIVIL PART
IN FAVOR OF: AGAINST:
BOARDWALK REGENCY CORPORATION | RICHARD D. GRAHAM
|

AN EXECUTION WAS ISSUED ON
AND WAS RETURNED ON
MONIES RECEIVED BY SCP OFFICER
TOTAL CREDITS

/ /	JUDGMENT DATE	08/18/1998
/ /	JUDGMENT AMOUNT(*)	\$3,167.67
\$.00	COSTS & ATTORNEY FEES	\$126.36
\$.00	ADDITIONAL COSTS	\$.00
	TOTAL	\$3,294.03
	CREDITS, IF ANY	\$.00
	TOTAL	\$3,294.03

(*) INCLUDES PRE-JUDGMENT INTEREST (IF ANY)

I HEREBY CERTIFY THAT THE FOREGOING REFLECTS THE JUDGMENT AND COSTS OF RECORD IN THIS COURT,
AS OF THIS TIME.

DATE: 2/26/00
SEAL

Teresa Ungaro

TERESA UNGARO, CLERK OF THE SPECIAL CIVIL PART
ATLANTIC COUNTY SPECIAL CIVIL PART

I, THE UNDERSIGNED, AM (ATTORNEY FOR) THE ABOVE
NAMED PLAINTIFF, CERTIFY THAT AT THE PRESENT TIME
THERE IS DUE UPON THE ABOVE MENTIONED JUDGMENT,
WHICH IS ABOUT TO BE DOCKETED IN THE SUPERIOR
COURT OF NEW JERSEY, AS HEREIN SET FORTH, THE TOTAL
JUDGMENT DUE INCLUDES THE \$5.00 DOCKETING FEE.

TOTAL JUDGMENT DUE	\$ _____
TOTAL CREDITS	\$ _____
SUBTOTAL	\$ _____
INTEREST	\$ _____
TOTAL DUE THIS DATE	\$ _____

(BEING A SUM NOT LESS THAN TEN DOLLARS)

I CERTIFY THAT THE FOREGOING STATEMENTS MADE BY ME ARE TRUE. I AM AWARE THAT IF ANY OF THE
FOREGOING STATEMENTS MADE BY ME ARE WILLFULLY FALSE, I AM SUBJECT TO PUNISHMENT.

DATE: _____

FILED

JAN 13 2000

The State of New Jersey

County of)
ss.
Atlantic)

**ATLANTIC COUNTY
SPECIAL CIVIL PART**

I, Teresa Ungaro, Clerk of the Special Civil Part, in the County of Atlantic, do certify that the foregoing is a true copy of the record in the case where Boardwalk Regency Corporation is plaintiff and Richard D. Graham is defendant; DC-3873-98 as full, entire and complete as the same on file in said Court in the case there stated.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seal of the said Court this 11th day of *January, 2000*

Teresa Ungaro

Teresa Ungaro Clerk

County of)
ss.
Atlantic)

I, Honorable Joseph E. Kane, Judge of Special Civil Part, in the County of Atlantic, do certify that the foregoing record and attestation made by Teresa Ungaro Clerk of the said Court, whose name is thereto subscribed and seal of office affixed are in due form and made by the proper officer.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seal of the said Court this 13th day of *January, 2000*

Joseph E. Kane

Honorable Joseph E. Kane Judge

County of)
ss.
Atlantic)

I, Teresa Ungaro, Clerk of Special Civil Part in the County of Atlantic, do certify that the Honorable Joseph E. Kane by whom the foregoing attestation was made, whose name is thereunto subscribed, was at the time making thereof and still is Judge of Special Civil Part, in the County of Atlantic, duly commissioned and sworn, to all whose acts as such, full faith and credit are and ought to be given as well as in Courts of Judicature as well as elsewhere.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seal of the said Court this 13th day of *January, 2000*

Teresa Ungaro

Teresa Ungaro Clerk

DEMAND \$ _____
INTEREST \$ _____
COSTS \$ _____
ATTY. FEES \$ _____
TOTAL JUDGMENT \$ _____

RECEIVED
AT THE CLERK'S OFFICE
ATLANTIC COUNTY CLERK'S OFFICE
AUGUST 18, 1998

AUG 18 1998

ROBERT E. REILERT, ESQ.
2100 PACIFIC AVENUE
ATLANTIC CITY, NEW JERSEY 08401
(609) 343-2442

ATTORNEY FOR THE PLAINTIFF: BOARDWALK REGENCY CORPORATION

BOARDWALK REGENCY CORPORATION, a
corporation of the State of New Jersey,

Plaintiff,

vs.

RICHARD D. GRAHAM,

Defendant.

STATE OF NEW JERSEY, COUNTY OF ATLANTIC:

SUPERIOR COURT OF NEW JERSEY
ATLANTIC COUNTY: LAW DIVISION
SPECIAL CIVIL PART
DOCKET NO. DC-3873-98
CIVIL ACTION

AFFIDAVIT OF PROOF

AND OF NON-MILITARY SERVICE

VINCENT SCALISE, of full age, being duly sworn according to law, upon my oath depose and say:

1. I, VINCENT SCALISE, am the Casino Accounting Manager for the Plaintiff and am duly authorized to make this Affidavit.
2. I am fully familiar with the books and business of the Plaintiff. The account of the Defendant, RICHARD D. GRAHAM, as set forth in the complaint in this cause is a true and accurate copy of the books of original entry of the Plaintiff.
3. At the special instance and request of the Defendant, personal checks were cashed for Defendant, RICHARD D. GRAHAM, by Plaintiff, and the proceeds of such encashment were accepted by Defendant. The Defendant promised to pay the amount of the personal check.
4. There remains due and owing to Plaintiff the sum of \$2,925.00, plus interest in the amount of \$ 251.67, for a total sum due and owing of \$3,176.67.
5. Defendant is not incompetent or a minor, and this claim is not based upon the repossession of a chattel, and I know that no Defendant named herein is in the military service of the United States. The source of my knowledge is my review of the Defendant's credit file in this matter.
6. I hereby request that judgment be entered in favor of Plaintiff Boardwalk Regency Corporation and against Defendant, RICHARD D. GRAHAM.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

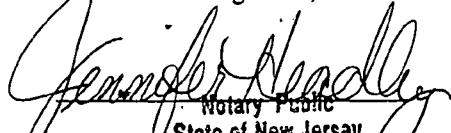
DATE: August 13, 1998


VINCENT SCALISE

CASINO ACCOUNTING MANAGER

Subscribed and sworn to

before me on August 13, 1998.


Notary Public
State of New Jersey
Jennifer Headley
My Appointment Expires

VENUE : ATLANTIC COURT : LAW SCP DOCKET #: DC 003873 98
CASE TITLE : BDWK REG CORP VS GRAHAM RICHARD

S	DATE FILED	DOC NUM	DOCUMENT TYPE	FILING/TARGET PARTY NAME	ATTORNEY NAME	MUL PTY	DOC STA
	06 16 1998	001	COMPLAINT-MAIL	BOARDWALK RE	REILERT		N
	08 18 1998	002	JDG DEFULT	COURT INIT			N
	08 18 1998	003	AFF PRF AMT DUE	BOARDWALK RE	REILERT		N
	09 29 1998	004	STAT FOR DOCKET	BOARDWALK RE	REILERT		N

CV900123 END OF SEARCH

PF1=INQRY PF2=MAINT PF5=SCP JUDGEMENTS

PF4=PROMPT PF6=CONSOLIDATED CASE LIST PF7=PRIOR PF8=NEXT PF22=HELP:

--BWK REG CORP
--(PLAINTIFF(S)) v-
-- VS --
--GRAHAM RICHARD
--(DEFENDANT(S))

NOV 20 1998
FINANCE SECT.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION-SPECIAL CIVIL PART
ON (CONTRACT)

DOCKET NO. : DC-003873-98
JUDGMENT NO. : VJ-004720-98

>>>> STATEMENT FOR DOCKETING <<<<

REC'D IN SUPERIOR COURT
DEC 4 1998

CREDITORS ATTORNEY:

ROBERT E. REILERT
2100 PACIFIC AVENUE
ATLANTIC CITY NJ 08401

-- JUDGMENT IN THE ABOVE ENTITLED CAUSE WAS ENTERED IN THE ATLANTIC COUNTY SPECIAL CIVIL PART
-- IN FAVOR OF: BOARDWALK REGENCY CORPORATION AGAINST: RICHARD D. GRAHAM

--AN EXECUTION WAS ISSUED ON / / JUDGMENT DATE 08/18/1998
--AND WAS RETURNED ON / / JUDGMENT AMOUNT(*) \$3,167.67
--MONIES RECEIVED BY SCP OFFICER \$.00 COSTS & ATTORNEY FEES \$126.36
--TOTAL CREDITS \$.00 ADDITIONAL COSTS \$.00
-- \$.00 TOTAL \$3,294.03
-- \$.00 CREDITS, IF ANY \$.00
-- \$.00 TOTAL \$3,294.03

(*)INCLUDES PRE-JUDGMENT INTEREST (IF ANY)

DJ-309380-98
--I HEREBY CERTIFY THAT THE FOREGOING REFLECTS THE JUDGMENT AND COSTS OF RECORD IN THIS COURT,
--AS OF THIS TIME.

--DATE: 9-29-98

SEAL

Teresa Ungaro
Civil/Eq. Division Mgr

TERESA UNGARO, CLERK OF THE SPECIAL CIVIL PART
ATLANTIC COUNTY SPECIAL CIVIL PART

--I, THE UNDERSIGNED, AM (ATTORNEY FOR) THE ABOVE
--NAMED PLAINTIFF, CERTIFY THAT AT THE PRESENT TIME
--THERE IS DUE UPON THE ABOVE MENTIONED JUDGMENT,
--WHICH IS ABOUT TO BE DOCKETED IN THE SUPERIOR
--COURT OF NEW JERSEY, AS HEREIN SET FORTH. THE TOTAL
--JUDGMENT DUE INCLUDES THE \$5.00 DOCKETING FEE.

TOTAL JUDGMENT DUE	\$ 3,294.03
TOTAL CREDITS	\$ -0-
SUBTOTAL	\$ 3,294.03
INTEREST	\$ 31.73
TOTAL DUE THIS DATE	\$ 3,325.76

(BEING A SUM NOT LESS THAN TEN DOLLARS)

-- I CERTIFY THAT THE FOREGOING STATEMENTS MADE BY ME ARE TRUE. I AM AWARE THAT IF ANY OF THE
--FOREGOING STATEMENTS MADE BY ME ARE WILLFULLY FALSE, I AM SUBJECT TO PUNISHMENT.

--DATE: October 28, 1998

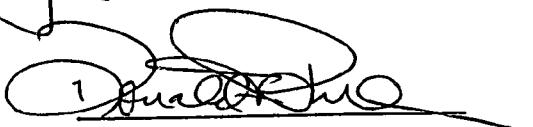
R DR CT

Superior Court of New Jersey

I, DONALD F. PHELAN, Clerk of the Superior Court of New Jersey, the same being a Court of Record, do hereby certify that the foregoing is a true copy of STATEMENT FOR DOCKETING filed December 4, 1998, in the cause wherein BOARDWALK REGENCY CORPORATION is the Plaintiff; and RICHARD D. GRAHAM is the Defendant, now on file in my office.

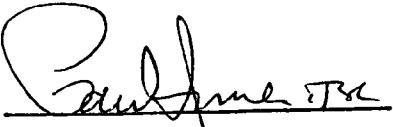
IN TESTIMONY WHEREOF, I have hereto set my hand and affixed the seal of said Court, at Trenton, this 23rd day of February, nineteen hundred and ninety-nine.

1


Clerk

I, PAUL INNES, Judge of the Superior Court of New Jersey, do hereby certify that Donald F. Phelan, whose name is subscribed to the above certificate, was, at the date thereof, and now is, the Clerk of the Superior Court of New Jersey, that the foregoing attestation is in proper form, that the seal thereto annexed is the seal of said Court, and that the signature of the said Donald F. Phelan, is in his own proper handwriting.

WITNESS my hand at the City of Trenton, this 23 day of February, nineteen hundred and ninety-nine.


Paul Innes, Jr.
Judge

NOTE--This certificate is made pursuant to an act of Congress
(Title 28 U.S. Code, Sec. 1738, effective September 1, 1948)

DJ 309380-98

Superior Court of New Jersey

BOARDWALK REGENCY CORP.

Plaintiff

RICHARD D. GRAHAM

Defendant

STATEMENT FOR DOCKETING

FILED

AM
MAY 08 2000
10:00 AM
William A. Shaw, Jr.
Prothonotary
NOTICE TO DEF.
Statement to aff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
STATEMENT OF JUDGMENT

BOARDWALK REGENCY CORPORATION

Plaintiff(s)

No. 00-529-CD

vs.

Real Debt \$3,294.03

RICHARD D. GRAHAM

Atty's Comm _____

Defendant(s)

Costs \$ _____

Int. From _____

Entry \$20.00

Instrument Foreign Judgment

from Atlantic Co., N. J.

Date of Entry May 08, 2000

Expires May 08, 2005

Certified from the record this 8th day of May, 2000.

William A. Shaw, Prothonotary

SIGN BELOW FOR SATISFACTION

Received on _____, 20 ___, of defendant full satisfaction of this Judgment, Debt, Interest and Costs and Prothonotary is authorized to enter Satisfaction on the same.

Plaintiff/Attorney

BOARDWALK REGENCY :
CORPORATION, : IN THE COURT OF COMMON PLEAS
2100 Pacific Avenue, : OF CLEARFIELD COUNTY
Camden City, New Jersey, 08401 :
Plaintiff :
VS. : CIVIL ACTION - LAW
RICHARD D. GRAHAM, :
602 W. DuBois Ave. #5 :
DuBois, Pennsylvania 15801 :
Defendant : NO: 00-529-CV

PETITION OF PLAINTIFF, BOARDWALK REGENCY CORPORATION, TO
COMPEL DISCOVERY
OF DEFENDANT, RICHARD D. GRAHAM

AND NOW, come the Plaintiff, Boardwalk Regency Corporation, by and through its attorneys, Carl J. Greco, P.C. and moves this Court as follows:

1. On or about May 19, 2000, the Plaintiff served Interrogatories Propounded by Plaintiff and Directed to Defendant in Aid of Execution. (A copy of said Interrogatories in Aid of Execution has been attached hereto and marked as Exhibit "A".)

2. As of the present date, despite repeated requests, no answers have been filed to the Plaintiff's Interrogatories, nor have any objections been made to the same.

FILED

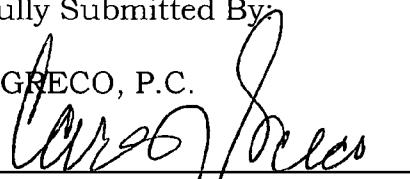
SEP 11 2000

William A. Shaw
Prothonotary

WHEREFORE, the Plaintiff, respectfully requests your Honorable Court to compel Defendant to file answers to Plaintiff's Interrogatories Directed to Defendant in Aid of Execution, within twenty (20) days from date of the Court Order.

Respectfully Submitted By:

CARL J. GRECO, P.C.

BY: 

Carl J. Greco, Esquire

Attorney for Plaintiff

CARL J. GRECO, P.C.

11th Floor, Bank Towers Bldg.

321 Spruce St.

Scranton PA 18503

(570)346-4434

CARL J. GRECO, P.C.
LAW OFFICES
11TH FLOOR-BANK TOWERS
321 SPRUCE STREET
SCRANTON, PA 18503

TEAL C. GILBERT
EMAIL: tcgilbert@cjgrecolaw.com

TELEPHONE NO. (570) 346-4434
FACSIMILE NO. (570) 346-4442

May 19, 2000

Richard D. Graham
602 W. Dubois Ave., #5
Dubois Pa 15801

**VIA REGULAR MAIL and
CERTIFIED MAIL RETURN
RECEIPT REQUESTS**

RE: Boardwalk Regency Corporation v. Richard D. Graham
Clearfield County Docket No. 00-529-CV

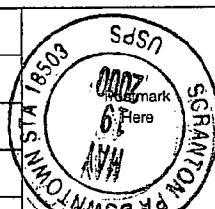
Dear Mr. Graham:

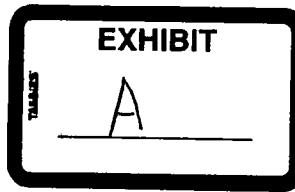
Enclosed find Plaintiff's Interrogatories in aid of execution directed towards you. Please be guided accordingly.

Very truly yours,

CARL J. GRECO, P.C.

By: Teal C. Gilbert
TEAL C. GILBERT

U.S. Postal Service	
CERTIFIED MAIL RECEIPT	
(Domestic Mail Only. No Insurance Coverage Provided)	
Article Sent To:	
Richard Graham - Interco	
Postage	\$ 121
Certified Fee	140
Return Receipt Fee (Endorsement Required)	125
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 386
 U.S. POSTAL SERVICE APPROVED MAIL U.S. POSTAL SERVICE	
Name (Please Print Clearly) (to be completed by mailer)	
Richard Graham	
Street, Apt. No., or PO Box No.	
602 W Dubois Ave #5	
City, State, ZIP+4	
Dubois Pa 15801	



BOARDWALK REGENCY :
CORPORATION, : IN THE COURT OF COMMON PLEAS
: OF CLEARFIELD COUNTY
PLAINTIFF :
VS. : CIVIL ACTION - LAW
RICHARD D. GRAHAM, :
DEFENDANT : NO. 00-529-CV

**INTERROGATORIES PROPOUNDED BY PLAINTIFF
AND DIRECTED TO DEFENDANT
IN AID OF EXECUTION**

The Plaintiff is seeking to collect on the judgment which it has secured against you in this case and needs information about your assets. You are required under Pa. R.C.P. Nos. 3117 and 4006 to file answers under oath or verification to the following Interrogatories within thirty (30) days after their service upon you:

DEFINITIONS

A. As used herein, the words "you" and "your" refer to defendant and defendant's agents, representatives, attorneys and all other persons acting or purporting to act on behalf of defendant.

B. As used herein, the word "document" shall mean the original and any copy, regardless of origin or location, or any book, pamphlet, periodical, letter, memorandum, telegram, report, study, handwritten note, working paper, or any other written, recorded, punched, or taped matter, however produced, to which you have or have had access.

C. As used herein, "corporation," "company" or "entity" shall mean any corporation, partnership, sole proprietorship, company, entity or business operation.

D. As used herein, "communication" shall mean all conversations, whether oral or written, all telephone calls, telegrams, letters, memoranda, documents, discussions or any other form of communication.

E. As used herein, "identify" or "identity" used in reference to an individual or person means to state his full name, present business and private addresses and telephone numbers, his present or last known occupation, his employer, and employer's address.

F. As used herein, "identify" or "identity" when used in reference to a corporation, company, entity or institution means to state its full name and present address and telephone numbers, any fictitious names under which it operates, and the present owners, officers and directors thereof with their current addresses.

G. As used herein, "identify" or "identity" when used in reference to a document or communication means to state the date, author, type of document or communication (e.g., letter, memorandum, telegram, chart, etc.) or any other means of identifying it its present location, and the name and address of its custodian. If any such document or communication was, but is no longer, in your possession or subject to your control, state what disposition was made of it and who presently has it.

H. If a precise value amount or date cannot be supplied in response to an Interrogatory, provided an approximate value, amount or date.

INTERROGATORIES

1. State your full name, address, age, telephone number and Social Security number.

2. What other names do you use, if any?

3. State the name(s), address(es) and age(s) of your present and/or former spouse and your children, if any.

4. With whom do you live?
5. Identify each of your dependents, if any.
6. What is your occupation?
7. If you work for someone else, state the name of your employer, the address where you work, the type of work you do, your gross pay per week and your take-home pay per week. If you receive commissions from your employer, state the average amount of such commissions you receive each week.
8. If you are self-employed, state the nature of your self-employment; the address of your office or place of business; the fictitious name under which you trade, if any; your average gross annual earnings; and your average net annual earnings.
9. Are you associated in a business or professional partnership or joint venture? If so, identify the partnership or joint venture and the members thereof; the nature of the business; the percentage of your interest; the estimated value of your interest; your average gross and net annual

compensation; all documents relating to the formation and governance of the partnership or joint venture.

10. Are you a principal of a closely held corporation? If so, identify the corporation; the stockholders, directors and officers, and their relationship to you, if any; the nature of the business; the number of shares and par value of the stock held by you and each of your fellow stockholders; any restrictions on the transfer of your stock; the market or repurchase value of your interest in the corporation; all documents relating to your purchase and ownership of stock in the corporation; all documents relating to incorporation of the corporation, bylaws and stockholders agreements.

11. State your gross taxable income as shown by your Federal Income Tax returns for the years 1994 through 1999.

12. What is your present average monthly income from all sources?

13. What is the present average monthly income of your household from all sources?

14. Do you pay rent for your present living quarters? If so, state the name and address of your landlord and the amount of rent you pay per month.

15. Do you own the home in which you now live? If so, state:

- a. Who has the title to the home in which you now live?
- b. When was the property purchased, what was the purchase price, by whom was it paid and what was the source of the funds used?
- c. Is there a mortgage on the property? If so, state the name and address of the mortgagee the amount of the original mortgage, the amount of the current mortgage balance, and the monthly mortgage payments.
- d. What is the current market value of the home in which you live?

16. Do you own any interest in any other real estate in this state or elsewhere either individually or jointly with another individual or entity? If so, as to each such interest state:

- (a) The full address and location of the real estate;

- (b) The market value of the real estate;
- (c) The nature and extent of your interest in the real estate, including joint, reversionary, remainder, leasehold, contingent or beneficial interest;
- (d) The name, address and telephone number of any joint owner;
- (e) The date you acquired your interest;
- (f) The amount and source of the funds which you paid to acquire such interest;
- (g) The identity of all documents which relate to your interest in the real estate and the source of funds used to purchase the interest (including statements, passbooks, check registers, etc.);
- (h) If there are any mortgages on such real estate, state as to each mortgage;

- (i) The identities of the mortgagee, the mortgagor and the real owner;
- (ii) The identity of all documents relating to the mortgage and the underlying obligation;
- (iii) The amount of the original mortgage obligation;
- (iv) The outstanding obligation of the mortgage;
- (v) The date on which the mortgage was executed; and
- (vi) The date on which and the office in which the mortgage was recorded.

- (i) If an interest is held in trust for you, identify the trustor, trustee and identify any documents relating thereto.

17. Have you, or has anyone on your behalf, conveyed or transferred any interest in any real estate to anyone within the last 3 years? If so, as to each conveyance or transfer state:

- (a) The description of the real estate;
- (b) The interest which you conveyed or transferred;

- (c) The identity of the person to whom you conveyed or transferred that interest;
- (d) The consideration which you received;
- (d) The reason for the conveyance or transfer;
- (e) The reason for the conveyance or transfer;
- (f) The identity of any documents which relate to the mortgage or other security interest; and
- (g) The priority of the mortgage or other security interest.

19. Do you own a motor vehicle or any interest in a motor vehicle either individually or jointly with another person or entity? If so, state as to each such vehicle:

- (a) The make, model, year, color, and serial number of the motor vehicle;
- (b) Whose name appears on the registration or title certificate;
- (c) The location and current custodian of the motor vehicle;
- (d) The purchase price of the motor vehicle;

- (e) The balance due on any outstanding purchase money security interest in the motor vehicle, and the name and address of the secured party.
- (f) Each person who paid any part of the purchase price or who has repaid or is repaying any part of a purchase money loan, and the amount and source of the funds paid;
- (g) The market value of the motor vehicle;
- (h) The identity of all documents relating to purchase of the motor vehicle, evidence of title or registration of ownership;
- (i) The nature and value of your interest in the motor vehicle.

20. Identify all items of tangible personal property having a value of \$100 or more which you own either individually or jointly with another person or entity including, but not limited to, jewelry, furs, furniture, office equipment, television sets, radios, record players, electrical appliances, power tools, photographic equipment, works of art, musical instruments, coin or stamp collections, silver or china; and for each item state the purchase price and date of purchase; the approximate value of each item; the seller of each item; by whom each item was purchased; the source of funds used to purchase each item; the nature and extent of your interest in each item; the name, address and telephone number of any joint owner; the location of each item; the amount due on any outstanding purchase money security interest, conditional sales agreement, lease/sale agreement, or other encumbrance; the name and address of the secured party, conditional seller or lessor; and all documents relating to the purchase and ownership of each item.

21. Do you own or have any interest in any corporate stocks, bonds, or other investment contracts, including any option to purchase or sell a security, either individually or jointly with another individual or entity or in the name of any entity in which you have any ownership interest or other involvement? If so, as to each such interest state:

- (a) The identity of such stock, bond or security;
- (b) The name in which such stock, bond or security is held;
- (c) The par or face value of such stock, bond or security;
- (d) The market value of such stock, bond or security;
- (e) The name, address and telephone of the custodian of such stock, bond or security;

- (f) By whom such stock, bond or security was purchased and the source of funds used to purchase such stock, bond or security;
- (g) The name, address and telephone number of any joint owner;
- (h) The date(s) on which interest is payable on any bonds;
- (i) The maturity date of any bond; and
- (j) The identity of any documents which relate to the purchase and ownership of such stock, bond or security including the actual stock, bond and securities certificates.

22. Identify any pension or 401(k) plan in which you have an interest; the nature of your interest; the dollar amount or value of your interest; and all documents relating thereto.

23. Do you own or maintain any savings or checking accounts, certificates of deposit, money market accounts, mutual fund accounts, or IRA or Keogh accounts, either individually or jointly with another individual or entity or in the name of any entity in which you have any ownership interest or other involvement? IF so, as to each account or certificate state:

- (a) The identity of the institution in which you have the account;

- (b) The title and number or identifying reference of the account or certificate;
- (c) The identity of any joint owner of the account or certificate and the nature of your joint ownership;
- (d) The nature of the account or certificate; and
- (e) The purchase price of the certificate;
- (f) The dates and amounts of your deposits or contributions for the last 2 years;
- (g) The date and amounts of your withdrawals for the last 2 years;
- (h) The current balance of the account or value of the certificate.

24. Do you have any safe deposit box or other similar storage facility in your name (either individually or jointly with another individual or entity), in the name of any entity in which you have any ownership or other involvement (either alone or jointly with another entity or individual) or in which you have contained personal property with a value in excess of \$100? If so, as to each such box or facility state:

- (a) The identity of the institution in which you rent or maintain such safe deposit box or facility;

- (b) The number under which such safe deposit box or facility is rented;
- (c) The name under which such safe deposit box or facility is rented; and
- (d) The contents of such safe deposit box or facility.

25. Identify any seat owned by you either individually or jointly with another person or entity in any stock commodity or other exchange; the estimated value of the seat; by whom the seat was purchased and the source of the funds used to purchase the seat; the name in which the seat is held; the name of the joint owner; and all documents relating to the purchase and ownership of the seat, and membership rules of the exchange.

26. Do you have any interest in any patent, copyright, or royalties or in any patentable invention or copyrightable material? If so, identify:

- (a) The patent, copyright, or royalties or the patentable invention or copyrightable material;
- (b) The nature of your interest;
- (c) The dollar amount or value of your interest;
- (d) The identity of any documents relating to your interest.

27. Have you any uncollected debts, accounts receivable, or other monies that are due you? If so, for each please state:

- (a) The identity of the debtors;
- (b) The date the debt was created;
- (c) The amount of the remaining debt;
- (d) The terms of repayment, including the date on which the debt is due;
- (e) The identity of any document which creates, evidences, or refers to the debt.

28. Are there any unsatisfied judgments of record in your favor in any action or have any judgments been assigned to you by anyone? If so, for each please state:

- (a) The identity of the judgment debtor;
- (b) The identity of the suit, action, or legal proceedings relating to the judgment, including the caption, the court in which it is filed, and the court term and number;
- (c) The identity of the assignor, if any;

- (d) The nature of the judgment;
- (e) The status of the judgment and any execution proceedings.

29. Do you hold any security interest in or lien on personal property? If so, as to each such security interest or lien, state:

- (a) The Description of the personal property, including the identity of the present owner;
- (b) The nature and amount of the security interest or lien, including the identification of any court action involved;
- (c) The date when you acquired the security interest or lien;
- (d) The obligation secured by such security interest or lien;
- (e) The identity of any documents which relate to the security interest or lien.

30. Have you any right, interest, financial advantage or prospect thereof under any contract, insurance or other claim, cause of action or pending lawsuit in the courts of this or any other state or in the federal courts? If so, for each please state:

- (a) The identity of the contract, insurance claim, cause of action or pending lawsuit, and any documents relating thereto;

- (b) The identity of the other party or parties involved;
- (c) The nature and current status of the contract, claim, cause of action, or lawsuit;
- (d) The known or estimated value of the same.

31. Are you the beneficiary of any trust? If so, identify the name, address and telephone number of the trustee, the duration of the trust and your interest therein, the amount of income you receive from the trust annually, the amount of the principal to which you are entitled upon distribution, the date of distribution, and the identity of all documents relating to the creation of the trust.

32. Have you received any money, or interest in real or personal property under any will or inheritance, or have you been notified of any interest in any decedent's estate since January, 1994? If so, identify the decedent, the executor or administrator, the nature and value of your bequest, devise, legacy or distributive share, and the date of distribution or expected distribution.

33. Do you have a will? If so, identify the property, real or personal, which is specifically devised, bequeathed or otherwise disposed of by your will, and the person named as executor.

34. Do you have any title insurance, casualty insurance, collision insurance, homeowners insurance or other insurance against loss or damage to property? If so, identify each policy, the issuer, and the property, real or personal, which is insured thereby.

35. Are you the beneficiary under an insurance policy on the life of any other person? If so, identify the policy, the issuer, the insured, the amount of the policy, the current value of the policy and any other beneficiaries.

36. Do you have any insurance on your own life? If so, identify the policy, the issuer, the amount of the policy, and the amount of premiums remaining to be paid.

37. Do you own or have an interest in any other assets not already disclosed? If so, please identify the same and the current location.

38. Identify each item of tangible personal property which you have in pawn; the name and address of the pawn broker; the value of the item; the amount of the pawn; and the terms of redemption.

39. Identify each item of tangible or intangible personal property owned by you either individually or jointly with another person or entity which is subject to any outstanding security interest; the name and address of the secured party; the security agreement; the balance due on the underlying obligation.

40. Have you sold, assigned, given or traded any tangible or intangible personal property or interest in personal property with a value of \$100 or more to anyone within the last 2 years? If so, as to each transfer, please state:

- (a) The description of the property;
- (b) The interest which you transferred;
- (c) the identity of the person to whom you transferred the property or interest therein;

- (d) The date of the transfer;
- (e) The consideration you received for each transfer;
- (f) The reason for such transfer;
- (g) The fair market value of the interest at the time of your transfer.

41. What money have you received and what money have you spent since January, 1997?

42. Do you owe any federal, state or local taxes? If so, identify each taxing authority, the period for which taxes are due, and the amount of taxes due.

43. Are you owed any federal, state or local tax refund? If so, identify each taxing authority, the period for which taxes are due you and the exact or estimated amount of the refund.

44. Do you make, or are you under obligation or order to make, any child or spousal support payments? If so, please specify for each such payment obligation:

- (a) The identity of the recipient;
- (b) The identity of any court action relating to such payments or obligations;
- (c) The amount of such payments or obligation;

(d) The payment and delinquency history of such payments in the last two years.

45. Do you owe anyone money? If so, identify each creditor by name and address, the amount due, and the terms of repayment.

46. Are you a member of any clubs? If so, identify each club, the amount of club dues, and whether the dues have been paid and by whom.

47. Are there any pending suits, actions, legal proceedings or claims of any kind against you or any interest you hold? If so, as to each state the following:

- (a) The identity of the other party or claimant;
- (b) The identity of the other party or claimant;
- (c) The nature of the suit, action, proceeding or claim;
- (d) The known or estimated value of the same;

(e) The current status of the suit, action, proceeding or claim.

48. Other than the judgment in this case, are there any judgments on record against you or any company or entity in which you have an interest? If so, for each judgment please state:

(a) The identity of the suit, action or legal proceedings relating to the judgment, including the title, the court in which its filed, and the court term and number;

(b) The amount and date of the judgment;

(c) The identity of the individual or entity in whose favor the judgment exists;

(d) Have payments been made on account thereof by you or by any third party, person or entity for you?

(e) If the answer to item (d) is yes, please identify amounts paid and the party, person or entity who paid them.

(f) Was the judgment satisfied and the satisfaction recorded?

(g) If answer to (f) is no, state why.

49. Is any judgment creditor currently attempting to execute on any judgment or secure information to aid in execution of any judgment? If so, as to each creditor, please specify:

- (a) The identity of the judgment creditor;
- (b) Amount of judgment;
- (c) Nature of the current activities by the judgment creditor.

50. List any other liabilities or obligations not already disclosed.

CARL J. GRECO, P.C.



TEAL C. GILBERT, ESQUIRE

CARL J. GRECO P.C.

Attorney for Plaintiff

Attorney ID #69302

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321 Spruce Street

Scranton, PA 18503

(570)346-4434

BOARDWALK REGENCY :
CORPORATION, : IN THE COURT OF COMMON PLEAS
PLAINTIFF : OF CLEARFIELD COUNTY
VS. : CIVIL ACTION - LAW
RICHARD D. GRAHAM, :
DEFENDANT : NO. 00-529-CV

CERTIFICATE OF SERVICE

I, CARL J. GRECO, ESQUIRE, hereby certify that I served a true and correct copy of the foregoing Interrogatories upon Defendant, Richard D. Graham, this 19th day of May, 2000, by depositing the same in the United States Mail, via Regular Mail and Certified Mail, Return Receipt Requested, postage prepaid, to the following address:

Richard D. Graham
602 W. Dubois Ave, #5
Dubois Pa 15801

Respectfully Submitted By:

CARL J. GRECO, P.C.

BY:



Teal C. GILBERT, ESQUIRE
CARL J. GRECO P.C.
Attorney for Plaintiff
Attorney ID #69302
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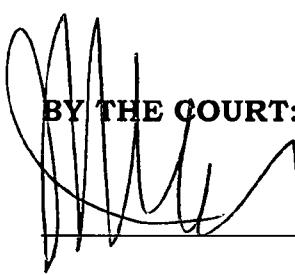
JA

BOARDWALK REGENCY :
CORPORATION, : IN THE COURT OF COMMON PLEAS
2100 Pacific Avenue, : OF CLEARFIELD COUNTY
Camden City, New Jersey, 08401 :
Plaintiff :
VS. : CIVIL ACTION - LAW
RICHARD D. GRAHAM, :
602 W. DuBois Ave. #5 :
DuBois, Pennsylvania 15801 :
Defendant : NO: 00-529-CV

RULE TO SHOW CAUSE

AND NOW, this 12th day of September, 2000, upon consideration of the Petition of Plaintiff, Boardwalk Regency Corporation, it is hereby ORDERED AND DECREED that the above-named Defendant show cause before this Court on October 05th, 2000, at 1:30 P M. o'clock, in Courtroom No. 1 in the Court of Common Pleas of Clearfield County, Clearfield County Courthouse, Clearfield PA, why the Court should not grant the relief requested by the Plaintiff in its Motion to Compel Discovery.

IT IS FURTHER ORDERED that the Plaintiff shall serve a copy of this Rule to Show Cause, together with a copy of its Motion to Compel Discovery and Memorandum in Support thereof on the Defendant within five (5) days of the date hereof.


BY THE COURT:

FILED

SFP 13 2000

J.

William A. Shaw
Prothonotary