

00-621-CD
COMMONWEALTH OF PENNSYLVANIA -vs- SENECA INSURANCE COMPANY, INC.
for use of the County of
Clearfield

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

(12) COMMONWEALTH OF
PENNSYLVANIA for use of the
COUNTY OF CLEARFIELD,
Plaintiff

vs.

SENECA INSURANCE COMPANY, INC.,
Defendant

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* No.: 00- 621-CD
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* Type of Case: Civil
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* Type of Pleading: Confession of Judgment
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*
* Filed on Behalf of: Plaintiff
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*
* Counsel of Record for this Party:
*
* Kim C. Kesner, Esquire
* Supreme Court I.D. #28307
* 23 North Second Street
* Clearfield, PA 16830
*
*
* Other Counsel of Record:
*
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FILED

MAY 25 2001

William A. Shaw
Prothonotary

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

COMMONWEALTH OF PENNSYLVANIA *
for use of the COUNTY OF CLEARFIELD, *
Plaintiff *
*
vs. * No.: 00- -CD
*
*
*
SENECA INSURANCE COMPANY, INC., *
Defendant *

CONFESION OF JUDGMENT

Pursuant to the authority contained in the Bonds and Warrants copies of which are annexed hereto of Seneca Insurance Company, Inc., as surety, for the Defendant, Marie Harris, such appearing of record in Commonwealth of Pennsylvania vs. Marie Harris, No. 99-881-CRA following this Court's Bail Forfeiture Order dated February 15, 2000, in accordance with Pa. R. Civ. P. Rule 2951(a), I appear for Seneca Insurance Company, Inc. and confess judgment in favor of the Plaintiff and against Defendant, Seneca Insurance Company, Inc. as follows:

Principal Sum (Bond): \$ 2,500.00

Interest at legal rate of 6% per annum
from the date of judgment (to be added) \$ _____

Plaintiff's filing fees and other taxable
costs (to be added) \$ _____



Kim C. Kesner, Solicitor
Attorney for Clearfield County, Plaintiff

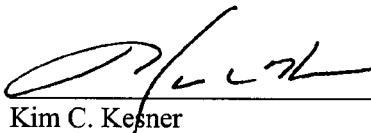
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

COMMONWEALTH OF PENNSYLVANIA *
for use of the COUNTY OF CLEARFIELD, *
Plaintiff *
*
vs. * No.: 00- -CD
*
*
SENECA INSURANCE COMPANY, INC., *
Defendant *

AFFIDAVIT

Commonwealth Of Pennsylvania :
: \$\$.
County Of Clearfield :

Before me the undersigned authority personally appeared, Kim C. Kesner, Solicitor for Clearfield County who deposes and says that the judgment confessed by him for Defendant, Seneca Insurance Company, Inc. is not being entered against a natural person in connection with a consumer credit transaction.



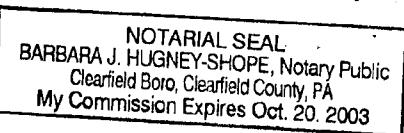
Kim C. Kesner

Sworn to and subscribed before me this 25th day of May, 2000.



Notary Public

My Commission Expires:



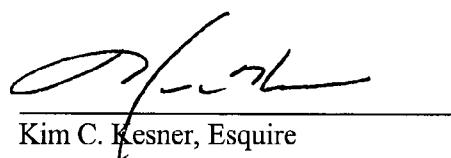
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

COMMONWEALTH OF PENNSYLVANIA *
for use of the COUNTY OF CLEARFIELD, *
Plaintiff *
*
vs. * No.: 00- -CD
*
*
SENECA INSURANCE COMPANY, INC., *
Defendant *

CERTIFICATE

I hereby certify that the principal place of business of the Plaintiff is Clearfield County Courthouse, 1 North Second Street, Clearfield, PA 16830 and that the address of the Defendant, Seneca Insurance Company, Inc. is % Joseph Gilliland, 609 Ogden Avenue, Clearfield, PA 16830 with a mailing address of P.O. Box 908, Clearfield, PA 16830 and Bond Department, 150 Water Street, New York, NY 10038.

Date: 5/24/00



Kim C. Kesner, Esquire

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

COMMONWEALTH OF PENNSYLVANIA *
for use of the COUNTY OF CLEARFIELD, *
Plaintiff *
*
vs. * No.: 00- -CD
*
*
SENECA INSURANCE COMPANY, INC. *
Defendant *

NOTICE

NOTICE is given that a judgment in the above-captioned matter has been entered against you in
the amount of \$2,500.00 on _____, 2000.

William A. Shaw, Prothonotary

286821-3

DJ No: 46-3-04

Date of Charge(s):

DJ Docket No: CR-171-99

7-29-99

Commonwealth vs. (Defendant Name and Address)

Marie Harris
1416 E. Presquile St.
Philipsburg, Pa. 16866

NEXT COURT ACTION

12-1-99
9:30 A.M.

Date/ Time/ Location

410 21st Street
Clearfield, Pa.
16830

Joseph Gilliland

, the undersigned surety, have posted security in the amount
of \$ 2,500.00.

TYPES OF SECURITY

Cash/Equivalent
 % Cash

Gov't Bearer Bonds
 Surety Bond

Realty w/in Commonwealth
 Realty Outside Commonwealth

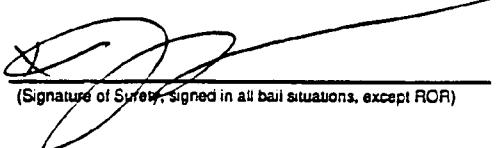
I have read this information, and I acknowledge that I, my personal representatives, successors, heirs and assigns are jointly and severally bound with the defendant and any other sureties to pay to the Commonwealth of Pennsylvania the sum of \$ 2,500.00, which is the full amount of the monetary condition of release in the event the bail bond is forfeited.

I understand that when a monetary condition of release is imposed, if the defendant appears at all times required by the court and satisfies all the other conditions set forth in the bail bond, then upon full and final disposition of the case, this bond shall be void. If the defendant fails to appear as required or to comply with the conditions of the bail bond, then this bond shall remain in full force, and the full sum of the monetary condition of release may be forfeited, the defendant's release may be revoked, and a warrant for the defendant's arrest may be issued.

WARRANT OF ATTORNEY: RECOGNIZING THAT I AM WAIVING CERTAIN IMPORTANT RIGHTS, INCLUDING THE RIGHT OF PREJUDGMENT NOTICE AND HEARING, in accordance with the law, I do hereby empower any attorney of any court of record within the Commonwealth of Pennsylvania or elsewhere to appear for me at any time, and with or without declarations filed, and whether or not the defendant be in default, to confess judgment against me, and in favor of the Commonwealth of Pennsylvania for use of the county, and its assigns, during any term or session of a court of record of the county for the full amount of the monetary condition of release set forth on the first page of this bail bond, and costs. I understand that any real estate which I have posted as security in this case may be levied upon to collect the amount confessed. I waive and release any right of inquisition on that real estate, voluntarily condemn it, and authorize the Prothonotary, upon a Writ of Execution, to enter my voluntary condemnation. I also agree that any real estate posted by me in this case may be sold on a Writ of Execution. I hereby forever waive and release any and all errors which may arise in any proceeding to confess judgment in this case, waive all rights of stay of execution, and waive all laws now in force or laws passed in the future which exempt real or personal property from execution.

Since a copy of this bail bond and warrant of attorney is being filed in the defendant's case, it shall not be necessary to file the original as a warrant of attorney, notwithstanding any law or rule of court to the contrary.

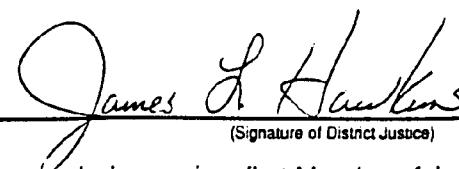
I have read this instrument carefully and know that it is true and correct.


(Signature of Surety, signed in all bail situations, except ROR)

X P.O. 908 Clearfield
(Address of Surety, Surety Company or Defendant)

Sworn (affirmed) and subscribed before me

this 24 day of Nov , 1999


(Signature of District Justice)
(SEAL)

My commission expires first Monday of January, 2000

Refund of Cash bail (less any bail related fees or commissions allowed by law and reasonable costs, if any, of ministering the cash bail program) will be made within 20 days after full and final disposition.

Refund of all other types of bail will be made promptly after 20 days following full and final disposition (Ps.R.Cr.P.4015)

Bring Cash Bail Receipt to Clerk of Courts or Issuing Authority.

DO NO: C-111-111	Date of Charge(s): 7-29-99
DJ Docket No: 46-3-04	
Commonwealth vs. (Defendant Name and Address) Marie Harris 1416 E. PRESQUE ISLE, ST. PHILIPSBURG, PA. 16866	NEXT COURT ACTION 12-1-99 9:30 A.M.
Date/ Time/ Location 410 21st Street CLEARFIELD, PA. 16830	
CHARGE(S): THEFT By UnLawful TAKING - UNAUTHORIZED USE OF VEH.	
ADDITIONAL CHARGES MAY EXIST. PLEASE SEE ADDITIONAL CHARGES PAGE.	
TYPE(S) OF RELEASE: <input type="checkbox"/> ROR <input type="checkbox"/> Unsecured Bail <input type="checkbox"/> Nonmonetary Condition(s) (see additional page(s)) <input type="checkbox"/> Nominal Bail <input checked="" type="checkbox"/> Monetary Condition(s) in the amount of \$ <u>2,500.00</u>	

THE CONDITIONS OF THIS BAIL BOND ARE AS FOLLOWS:

1. The defendant must appear at all times required until full and final disposition of the case.
2. The defendant must obey all further orders of the bail authority.
3. The defendant must give written notice to the bail authority, the clerk of courts, the district attorney, and the court bail agency or other designated court bail officer, of any change of address within 48 hours of the date of the change.
4. The defendant must neither do, nor cause to be done, nor permit to be done on his/her behalf, any act as proscribed by Section 4952 of the Crimes Code (relating to intimidation of witnesses or victims) or by Section 4953 (relating to retaliation against witnesses or victims), 18 Pa.C.S. §§ 4952,4953.
5. The defendant must refrain from criminal activity.

TYPES OF SECURITY:

<input type="checkbox"/> Cash/Equivalent	<input type="checkbox"/> Gov't Bearer Bonds	<input type="checkbox"/> Realty w/in Commonwealth
<input type="checkbox"/> <u> </u> % Cash	<input checked="" type="checkbox"/> Surety Bond	<input type="checkbox"/> Realty outside Commonwealth

TOTAL AMOUNT BAIL SET (IF ANY): \$ 2,500.00 (see sureties page)

This bond is valid for the entire proceedings and until full and final disposition of the case including all avenues of direct appeal to the Supreme Court of Pennsylvania.

AGREE THAT I WILL APPEAR AT ALL SUBSEQUENT PROCEEDINGS AS REQUIRED AND COMPLY WITH ALL THE CONDITIONS OF THE BAIL BOND.

IS BOND SIGNED ON 11-24, 19 99

Hawkins

, PENNSYLVANIA

J. Marie Hawkins

(Signature of Defendant)

Signed and acknowledged before me this 24 day of Nov., 19 99

James L. Hawkins

(Clerk of Court or Issuing Authority)

(SEAL)

OFFICE OR ISSUING AUTHORITY

DATE

James L. Hawkins

commission expires first Monday of January, 2000

PLEASE SEE ATTACHED PAGES FOR ADDITIONAL INFORMATION.

Prout

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CRIMINAL ACTION

COMMONWEALTH OF PENNSYLVANIA : :

VS. : NO. 99-881-CRA

MARIE HARRIS : :

BENCH WARRANT

NOW, this 15th day of February, 2000, this being the day and date set for sentencing into the above-captioned matter; Defendant having failed to answer the Call of the Court; she having received due and proper notice thereof, it is the ORDER of this Court that Bail be forfeit and Bench Warrant issue forthwith.

BY THE COURT,

John M. Prout, Jr.

President Judge

WARNING! DO NOT ACCEPT THIS DOCUMENT UNLESS YOU CAN SEE A TRUE WATERMARK AND VISIBLE FIBERS FROM BOTH SIDES.



160 WATER ST., NEW YORK, NY 10038

POWER OF ATTORNEY

VALID IF POSTED BY:

March 1, 2001

POWER AMOUNT \$

5,000

POWER NO. S05

00171465

KNOW ALL MEN BY THESE PRESENTS that Seneca Insurance Company, Inc., a corporation duly organized and existing under the laws of the State of New York, has constituted and appointed does hereby constitute and appoint the named Executing Agent its true and lawful Attorney-in-Fact, with full power and authority to sign the company's name and affix its corporate seal to, and to do on its behalf as surety, any and all obligations as herein provided, and the execution of such obligations in pursuance of these presents shall be as binding upon the company as fully and to all intent purposes as if done by the regularly elected officers of said company at its home office in their own proper persons; and the said company hereby ratifies and confirms all and whatsoever its said attorney-in-fact may lawfully do and perform in the premises by virtue of these presents.

The obligation of the company shall not exceed the sum of

FIVE THOUSAND DOLLARS

Authority of such Attorney-in-Fact is limited to appearance bonds and cannot be construed to guarantee defendant's future lawful conduct, adherence to travel limitation, fines, restitution, payment penalties, or any other condition imposed by a court not specifically related to court appearance. This Power of Attorney is for use with Bail Bonds only and is void if altered, erased, or used with powers of this company. It is not valid if used in connection with Federal Immigration Bonds or Civil Bonds. A separate Power of Attorney must be attached to each bond executed. STACKING POWERS IS STRICTLY PROHIBITED! No more than one power from this Surety may be used to execute any one bond. Powers of Attorney must not be returned to Attorney-in-Fact, but remain a permanent part of the court records.

IN BOND FORFEITS, attach a copy of this Power of Attorney to the forfeiture notice and mail to SENECA INSURANCE COMPANY, INC., ATTN: BAIL BOND DEPT., 160 WATER ST., 16TH FLOOR, NEW YORK, NY 10038 AND the Executing Agent named below as: JOE GILLILAND

IN WITNESS WHEREOF, Seneca Insurance Company, Inc. has caused these presents to be signed by its duly authorized attorney-in-fact, proper for the purpose and its corporate seal to be hereunto affixed this 24 day of NOVEMBER

Bond Amount \$

2500

Appearance Date

1994 CALLED

Defendant

MARIE HAGGINS

D.O.B.

SS #

Court

City

State

Charge

Charge

Case No.

If rewrite, Original No. Joseph Schreier
Executing Agent Joseph Schreier
SENPOA121-01W

Secretary

MARC T.A. WOLIN

President

DOUGLAS M. LIBBY

FOR STATE USE ONLY
NOT VALID IF USED IN FEDERAL COURT

DESIGNED BY: CORNERSTONE GRAF

IT IS UNLAWFUL TO PRINT OR REPRODUCE THIS FORM.

COURT COPY



150 WATER ST., NEW YORK, NY 10038

No. S 00007014 P. 2

ONLY VALID IF NUMBERED IN RED

QUALIFYING POWER OF ATTORNEY

Valid in CLEARFIELD County only

KNOW ALL MEN BY THESE PRESENTS:

That SENECA INSURANCE COMPANY, INC., a corporation of the State of New York, does hereby make,

constitute and appoint: Joseph Gilliland

its true and lawful attorney-in-fact with full power and authority, for and on behalf of the Company as surety, to execute and deliver and affix the seal of the Company thereto, if a seal is required, on all documents necessary or incidental to the execution of bail bonds not exceeding \$ ~~100,000~~ per bond.

The execution of a bail bond by said attorney-in-fact shall be binding upon this Company as if such bond has been executed and acknowledged by the regularly elected officers of this Company.

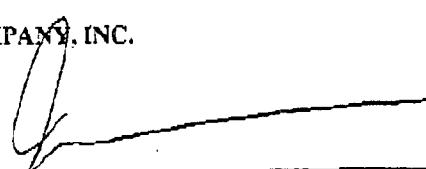
SENECA INSURANCE COMPANY, INC. certifies that this appointment is made in accordance with a resolution of the Board of Directors of SENECA INSURANCE COMPANY, INC., by unanimous written consent dated January 1, 1998, a true and exact copy of which follows:

The Company authorizes the President, Executive Vice Presidents, Senior Vice Presidents, and Secretary to appoint attorneys-in-fact or agents who shall have the authority to issue bail bonds in the name of the Company. The signature of any of these authorized Company officers and the Company seal may be affixed by facsimile to a qualifying power of attorney for the execution of a bail bond. The facsimile signature and seal used in this manner is hereby adopted by the Company as the original and, therefore, is binding upon the Company with the same force and effect as though manually affixed.

IN WITNESS WHEREOF, SENECA INSURANCE COMPANY, INC., has caused this document to be signed by its duly authorized officer and its corporate seal to be hereunto affixed this 1st day of January, 1999.

SENECA INSURANCE COMPANY, INC.

Qualifying Power only, not to be attached to any Bond. Valid only if individual Power of Attorney is attached to each Bond executed.

By: 

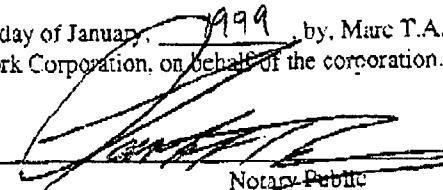
Marc T.A. Wolin, Secretary

State of New York
Borough of Manhattan

NOTARY PUBLIC

The foregoing instrument was acknowledged before me this 1st day of January, 1999, by Marc T.A. Wolin, Secretary, of SENECA INSURANCE COMPANY, INC., a New York Corporation, on behalf of the corporation.

LANCELOT L. THOMAS
Notary Public, State of New York
No. 24-4643160
Qualified in Kings County
Notary Expiration Date Commission Expires October 17, 20


Notary Public

Lance Thomas

Print Name

CMO 41 Page 24

JOSEPH K GILLILAND	
License Number 44461	
is licensed to engage in the business of insurance in the Commonwealth of Pennsylvania in the capacity stated below, subject to applicable laws and rules.	
LICENSE TYPE	EXPIRATION DATE
Resident Agent	10-14-2001
QUALIFICATIONS	CE REQUIREMENTS
Accident and Health, Casualty and Allied Lines, Life and Fixed Annuities, Property and Allied Lines	Total 24

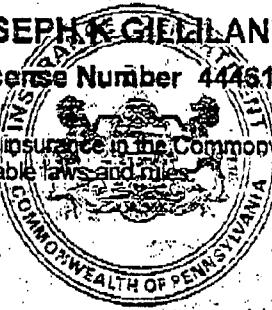
Licensee must notify the Insurance Department of an address change within 15 days of the move.

The agent cannot produce business until the agent is appointed with the insurer.

If your license is subject to Continuing Education (CE) requirements, the CE requirement MUST BE SATISFIED 60 DAYS before your license expiration date.

JOSEPH K GILLILAND

License Number 44461



is licensed to engage in the business of insurance in the Commonwealth of Pennsylvania in the capacity stated below, subject to applicable laws and rules

LICENSE TYPE

Resident Agent

QUALIFICATIONS

Accident and Health, Casualty and Allied Lines, Life and Fixed Annuities, Property and Allied Lines

GILLILAND, JOSEPH K

603 OGDEN AVENUE

CLEARFIELD, PA 16830-0000

EXPIRATION DATE

10-14-2001

CE REQUIREMENTS

Total 24

SEP 23 1999

SEP 23 1999

e/88

NOTICES TO DEFENDANT & PLAINTIFF
FIRST CERTIFIED TO DEFENDANT & PLAINTIFF
PROTHONOTARY
WILLIAM A. SHAW
1/15/04
MAY 25 2004
RECORDED

FILED

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA CIVIL ACTION - LAW	COMMONWEALTH of PENNSYLVANIA for the use of the COUNTY of CLEARFIELD, Plaintiff	SENECA INSURANCE COMPANY, INC., Defendant	Confession of Judgment	CLEARFIELD COUNTY COURT HOUSE CLEARFIELD, PA 16830 KIM C. KESNER, ESQUIRE SOLICITOR (814) 765-2641
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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

COMMONWEALTH OF PENNSYLVANIA *
for use of the COUNTY OF CLEARFIELD, *
Plaintiff *
*
vs. * No.: 00-621-CD
*
*
SENECA INSURANCE COMPANY, INC. *
Defendant *

NOTICE

NOTICE is given that a judgment in the above-captioned matter has been entered against you in
the amount of \$2,500.00 on MAY 25, 2000.

William A. Shaw, Prothonotary



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

COMMONWEALTH OF PENNSYLVANIA Docket: 281
for use of the COUNTY OF CLEARFIELD

Plaintiffs (s)

No.: 00-621-CD

Real Debt: \$2,500.00

Atty's Comm:

Vs.

Costs: \$TO BE ADDED

Int. From:

SENCECA INSURANCE COMPANY, INC Entry: \$

Defendant (s)

Instrument: CONFESSION OF JUDGMENT

Date of Entry: May 25, 2000

Expires: MAY 25, 2005

Certified from the record this 25TH day of MAY, 2000.

William A. Shaw, Prothonotary

SIGN BELOW FOR SATISFACTION

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

Plaintiff/Attorney

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

COMMONWEALTH OF PENNSYLVANIA *
for use of the COUNTY OF CLEARFIELD, *
Plaintiff *
*
* vs. * No.: 00-621-CD
*
*
* SENECA INSURANCE COMPANY, *
Defendant *

PRAECIPE TO SATISFY JUDGMENT

TO: Prothonotary

Kindly mark the confessed judgment in the above captioned matter satisfied..

D. L. Smith

Kim C. Kesner, Esquire
Attorney for Plaintiff

cc: Bail USA

William A. Shaw
Prothonotary

NOV 16 2001

CD

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

COMMONWEALTH OF PENNSYLVANIA,
FOR USE OF THE COUNTY OF
CLEARFIELD, PLAINTIFF

VS.

SENECA INSURANCE COMPANY

No. 00-621-CD

PRAECIPE TO SATISFY JUDGMENT

KIM C. KESNER
ATTORNEY AT LAW
23 North Second Street
CLEARFIELD, PA 16830
(814) 765-1706

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

CERTIFICATE OF SATISFACTION OF JUDGMENT

No.: 2000-00621-CD

Commonwealth of PA

Debt: \$2,500.00

Vs.

Atty's Comm.:

Seneca Insurance Company

Interest From:

Cost: \$27.00

NOW, Friday, November 16, 2001 , directions for satisfaction having been received, and all costs having been paid, SATISFACTION was entered of record.

Certified from the record this 16th day of November, A.D. 2001.

Prothonotary

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

COMMONWEALTH OF
PENNSYLVANIA for the us of
the COUNTY OF CLEARFIELD,
Plaintiff,

v.

SENECA INSURANCE COMPANY,
INC.,
Defendant.

*
*
*
* No. 00-621-CD
*
*

* Type of Pleading:

* Petition to Open
* Judgment
*

* Filed on behalf of:
* Defendant
*

* Counsel of Record for
* this party:
*

* James A. Naddeo, Esq.
* Pa I.D. 06820
*

* 211 1/2 E. Locust Street
* P.O. Box 552
* Clearfield, PA 16830
* (814) 765-1601

FILED

JAN 21 2002

William A. Shaw
Prothonotary

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

AND NOW, this 24th day of January, 2002, upon consideration of the attached Petition to Open Judgment, a Rule is hereby issued upon Plaintiff to Show Cause why the Petition to Open Judgment should not be granted. Rule Returnable for written response on the 13 of February, 2002.

NOTICE

A PETITION HAS BEEN FILED AGAINST YOU IN COURT. IF YOU WISH TO DEFEND AGAINST THE CLAIMS SET FORTH IN THE FOLLOWING PETITION, YOU MUST TAKE ACTION BY ENTERING A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILING IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE MATTER SET FORTH AGAINST YOU. YOU ARE WARNED THAT IF YOU FAIL TO DO SO THE CASE MAY PROCEED WITHOUT YOU AND AN ORDER MAY BE ENTERED AGAINST YOU BY THE COURT WITHOUT FURTHER NOTICE FOR RELIEF REQUESTED BY THE PETITIONER OR MOVANT. YOU MAY LOSE RIGHTS IMPORTANT TO YOU.

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

COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
Market Street
Clearfield, PA 16830
(814) 765-2641

FILED

JAN 24 2002

0/25/11 (cc at Naddie)
William A. Shaw 8
Prothonotary

BY THE COURT

Judge

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

COMMONWEALTH OF *
PENNSYLVANIA for the us of *
the COUNTY OF CLEARFIELD, *
Plaintiff, *
*
v. * No. 00-621-CD
*
SENECA INSURANCE COMPANY, *
INC., *
Defendant. *

PETITION TO OPEN JUDGMENT

NOW comes the Defendant, Seneca Insurance Company, Inc., and by its attorney, James A. Naddeo, Esquire, sets forth the following:

1. That the Petitioner is Seneca Insurance Company, Inc., as surety for Marie Harris, a corporation of the State of New York with a Bond Department at 150 Water Street, New York, NY 10038, and an address of c/o Joseph Gilliland, 609 Ogden Avenue, Clearfield, Pennsylvania 16830.

2. That the Respondent is Commonwealth of Pennsylvania for use of the County of Clearfield, Pennsylvania, with an address of 1 North Second Street, Clearfield, Pennsylvania 16830.

3. That the Respondent commenced this action by filing a Confession of Judgment against the Respondent, Seneca Insurance Company, Inc., as a surety, for the Defendant, Marie

Harris, such appearing of record in Commonwealth of Pennsylvania v. Marie Harris, No. 99-818-CRA, following a Bail Forfeiture Order dated February 15, 2000. A copy of the Confession of Judgment and supporting documents is attached hereto collectively as Exhibit "A".

4. That the Respondent through its agent, Joseph W. Gilliland, a licensed insurance agent in the Commonwealth of Pennsylvania, posted a surety bond on behalf of Marie Harris on or about November 24, 1999 in the amount of Two Thousand Five Hundred (\$2,500.00) Dollars.

5. That the said Marie Harris left the jurisdiction of Clearfield County, Pennsylvania, thereby violating the terms of her bail and said bail was ordered forfeited.

6. That subsequent to the forefeiture of the bail, Joseph W. Gilliland, as an agent for the Respondent, Seneca Insurance Company, Inc., through his efforts located Marie Harris and she was returned to the custody of Clearfield County, Pennsylvania, on December 22, 2001.

7. That until the return of Marie Harris to Clearfield County, Pennsylvania, on December 22, 2001 your Petitioner had no reason to request the opening of the judgment.

WHEREFORE, Petitioner, Seneca Insurance Company, Inc., hereby requests your Honorable Court to enter a rule upon the

Plaintiff to show cause why the judgment of confession entered
to the above-captioned term and number should not be opened.



James A. Naddeo
Attorney for Respondent

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

COMMONWEALTH OF PENNSYLVANIA *
for use of the COUNTY OF CLEARFIELD, *
Plaintiff *
*
vs. * No.: 00- -CD
*
*
*
SENECA INSURANCE COMPANY, INC., *
Defendant *

CONFESSTION OF JUDGMENT

Pursuant to the authority contained in the Bonds and Warrants copies of which are annexed hereto of Seneca Insurance Company, Inc., as surety, for the Defendant, Marie Harris, such appearing of record in Commonwealth of Pennsylvania vs. Marie Harris, No. 99-881-CRA following this Court's Bail Forfeiture Order dated February 15, 2000, in accordance with Pa. R. Civ. P. Rule 2951(a), I appear for Seneca Insurance Company, Inc. and confess judgment in favor of the Plaintiff and against Defendant, Seneca Insurance Company, Inc. as follows:

Principal Sum (Bond): \$ 2,500.00

Interest at legal rate of 6% per annum
from the date of judgment (to be added) \$ _____

Plaintiff's filing fees and other taxable
costs (to be added) \$ _____



Kim C. Kesner, Solicitor
Attorney for Clearfield County, Plaintiff

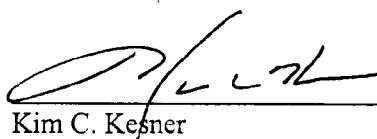
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

COMMONWEALTH OF PENNSYLVANIA *
for use of the COUNTY OF CLEARFIELD, *
Plaintiff *
*
vs. * No.: 00- -CD
*
*
SENECA INSURANCE COMPANY, INC., *
Defendant *

AFFIDAVIT

Commonwealth Of Pennsylvania :
: §§.
County Of Clearfield :
:

Before me the undersigned authority personally appeared, Kim C. Kesner, Solicitor for Clearfield County who deposes and says that the judgment confessed by him for Defendant, Seneca Insurance Company, Inc. is not being entered against a natural person in connection with a consumer credit transaction.

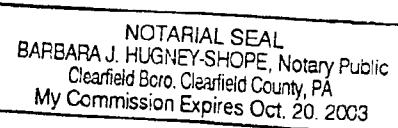


Kim C. Kesner

Sworn to and subscribed before me this 25th day of May, 2000.

Barbara J. Hugney-Shope
Notary Public

My Commission Expires:



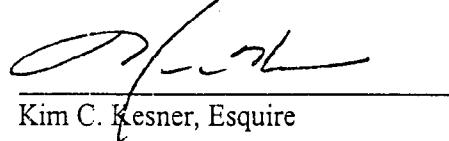
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

COMMONWEALTH OF PENNSYLVANIA *
for use of the COUNTY OF CLEARFIELD, *
Plaintiff *
*
vs. * No.: 00- -CD
*
*
SENECA INSURANCE COMPANY, INC., *
Defendant *

CERTIFICATE

I hereby certify that the principal place of business of the Plaintiff is Clearfield County Courthouse, 1 North Second Street, Clearfield, PA 16830 and that the address of the Defendant, Seneca Insurance Company, Inc. is % Joseph Gilliland, 609 Ogden Avenue, Clearfield, PA 16830 with a mailing address of P.O. Box 908, Clearfield, PA 16830 and Bond Department, 150 Water Street, New York, NY 10038.

Date: 5/24/00



Kim C. Kesner, Esquire

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

COMMONWEALTH OF PENNSYLVANIA *
for use of the COUNTY OF CLEARFIELD, *
Plaintiff *
*
vs. * No.: 00- -CD
*
*
SENECA INSURANCE COMPANY, INC. *
Defendant *

NOTICE

NOTICE is given that a judgment in the above-captioned matter has been entered against you in
the amount of \$2,500.00 on _____, 2000.

William A. Shaw, Prothonotary

2868-21-3

DJ No: 46-3-04

Date of Charge(s):

DJ Docket No: CR-121-99

7-29-99

Commonwealth vs. (Defendant Name and Address)

Marie Harris
1416 E. Presque Isle, St.
Philipsburg, Pa. 16866

NEXT COURT ACTION

Date/ Time/ Location

12-1-99
9:30 A.M.

410 21st Street
Clelfield, Pa.
16830

Joseph Gilliland

, the undersigned surety, have posted security in the amount

\$ 2,500.00

TYPES OF SECURITY

Cash/Equivalent
 % Cash

Gov't Bearer Bonds
 Surety Bond

Realty in Commonwealth
 Realty Outside Commonwealth

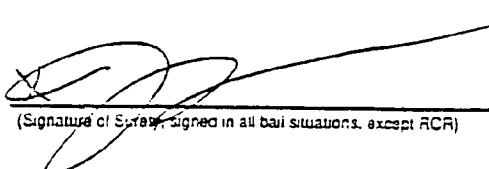
I have read this information, and I acknowledge that I, my personal representatives, successors, heirs and assigns are jointly and severally bound with the defendant and any other sureties to pay to the Commonwealth of Pennsylvania the sum of \$ 2,500.00, which is the full amount of the monetary condition of release in the event the bail bond is forfeited.

I understand that when a monetary condition of release is imposed, if the defendant appears at all times required by the court and satisfies all the other conditions set forth in the bail bond, then upon full and final disposition of the case, this bond shall be void. If the defendant fails to appear as required or to comply with the conditions of the bail bond, then this bond shall remain in full force, and the full sum of the monetary condition of release may be forfeited, the defendant's release may be revoked, and a warrant for the defendant's arrest may be issued.

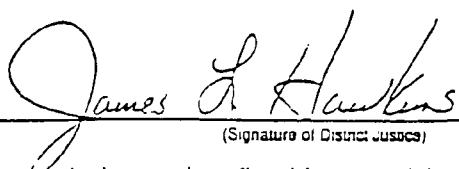
WARRANT OF ATTORNEY: RECOGNIZING THAT I AM WAIVING CERTAIN IMPORTANT RIGHTS, INCLUDING THE RIGHT OF PREJUDGMENT NOTICE AND HEARING, in accordance with the law, I do hereby empower any attorney of any court of record within the Commonwealth of Pennsylvania or elsewhere to appear for me at any time, and with or without declarations filed, and whether or not the defendant be in default, to confess judgment against me, and in favor of the Commonwealth of Pennsylvania for use of the county, and its assigns, during any term or session of a court of record of the county for the full amount of the monetary condition of release set forth on the first page of this bail bond, and costs. I understand that any real estate which I have posted as security in this case may be levied upon to collect the amount confessed. I waive and release any right of inquisition on that real estate, voluntarily condemn it, and authorize the Prothonotary, upon a Writ of Execution, to enter my voluntary condemnation. I also agree that any real estate posted by me in this case may be sold on a Writ of Execution. I hereby forever waive and release any and all errors which may arise in any proceeding to confess judgment in this case, waive all rights of stay of execution, and waive all laws now in force or laws passed in the future which exempt real or personal property from execution.

Since a copy of this bail bond and warrant of attorney is being filed in the defendant's case, it shall not be necessary to file the original as a warrant of attorney, notwithstanding any law or rule of court to the contrary.

I have read this instrument carefully and know that it is true and correct.


(Signature of Surety, signed in all bail situations, except RCR)


(Address of Surety, Surety Company or Defendant)


(Signature of District Justice)

My commission expires first Monday of January, 2000

Refund of Cash bail (less any bail related fees or commissions allowed by law and reasonable costs, if any, of administering the cash bail program) will be made within 20 days after full and final disposition.

Refund of all other types of bail will be made promptly after 20 days following full and final disposition (Ps.R.Cr.P.4015) and Cash Bail Receipt to Clerk of Courts or Issuing Authority.

DJ Docket No: 46-3-04

Date of Charge(s): 7-29-99

Commonwealth vs. (Defendant Name and Address)
 Marie Harris
 1416 E. PRESQUISLE, ST.
 Philipsburg, PA. 16866

NEXT COURT ACTION

Date/ Time/ Location

12-1-99

9:30 A.M.

410 21st Street

Clearfield, PA. 16830

CHARGE(S): THEFT By Unlawful Taking - UNAUTHORIZED USE OF VEH.

ADDITIONAL CHARGES MAY EXIST. PLEASE SEE ADDITIONAL CHARGES PAGE.

TYPE(S) OF RELEASE:

ROR Unsecured Bail Nonmonetary Condition(s) (see additional page(s))
 Nominal Bail Monetary Condition(s) in the amount of \$ 2,500.00

THE CONDITIONS OF THIS BAIL BOND ARE AS FOLLOWS:

1. The defendant must appear at all times required until full and final disposition of the case.
2. The defendant must obey all further orders of the bail authority.
3. The defendant must give written notice to the bail authority, the clerk of courts, the district attorney, and the court bail agency or other designated court bail officer, of any change of address within 48 hours of the date of the change.
4. The defendant must neither do, nor cause to be done, nor permit to be done on his/her behalf, any act as proscribed by Section 4952 of the Crimes Code (relating to intimidation of witnesses or victims) or by Section 4953 (relating to retaliation against witnesses or victims), 18 Pa.C.S. §§ 4952,4953.
5. The defendant must refrain from criminal activity.

TYPES OF SECURITY:

Cash/Equivalent Gov't Bearer Bonds Realty w/in Commonwealth
 % Cash Surety Bond Realty outside Commonwealth
 TOTAL AMOUNT BAIL SET (IF ANY): \$ 2,500.00 (see sureties page)

This bond is valid for the entire proceedings and until full and final disposition of the case including all avenues of direct appeal to the Supreme Court of Pennsylvania.

AGREE THAT I WILL APPEAR AT ALL SUBSEQUENT PROCEEDINGS AS REQUIRED AND COMPLY WITH ALL THE CONDITIONS OF THE BAIL BOND.

SECOND SIGNED ON 11-24 19 99Hawkins

, PENNSYLVANIA

J. Marie Harris

(Signature of Defendant)

Signed and acknowledged before me this 24 day of Nov., 19 99James L. Hawkins

(SEAL)

(Clerk of Court or Issuing Authority)

CLERK OR ISSUING AUTHORITY

DATE

James L. HawkinsCommission expires first Monday of January, 2000

PLEASE SEE ATTACHED PAGES FOR ADDITIONAL INFORMATION.

DO NOT REPRODUCE OR DISTRIBUTE THIS DOCUMENT UNLESS YOU CAN SEE A TRUE WATER MARK AND VISIBLE FIBERS FROM BOTH SIDES

SENECA

POWER OF ATTORNEY

VALID IF POSTED BY:

March 1, 2001

POWER AMOUNTS

5,000

POWER NO. S05 00171465

KNOW ALL MEN BY THESE PRESENTS that Seneca Insurance Company, Inc., a corporation duly organized and existing under the laws of the State of New York, has constituted and appointed does hereby constitute and appoint the named Executing Agent its true and lawful Attorney-in-Fact, with full power and authority to sign the company's name and affix its corporate seal to, and to, its behalf as surety, any and all obligations as herein provided, and the execution of such obligations in pursuance of these presents shall be as binding upon the company as fully and to all intent purposes as if done by the regularly elected officers of said company at its home office in their own proper person and the said company hereby ratifies and confirms all and whatever its said attorney-in-fact may lawfully do and perform in the premises by virtue of these presents.

The obligation of the company shall not exceed the sum of

FIVE THOUSAND DOLLARS

Authority of surety attorney-in-fact is limited to appearance bonds and cannot be construed to guarantee defendant's future lawful conduct, adherence to travel limitation, fines, restitution, paying penalties, or any other condition imposed by a court not specifically related to court appearance. This Power of Attorney is for use with Bail Bonds only and is void if altered, erased, or used with powers of this company. It is not valid if used in connection with Federal Immigration Bonds or Civil Bonds. A separate Power of Attorney must be attached to each bond executed. **STACKIN POWERS IS STRICTLY PROHIBITED!** No more than one power from this Surety may be used to execute any one bond. Powers of Attorney must not be returned to Attorney-in-Fact, but is to remain a permanent part of the court records.

IN BOND FORFEITS, attach a copy of this Power of Attorney to the forfeiture notice and mail to SENECA INSURANCE COMPANY, INC., ATTN: BAIL BOND DEPT., 160 WATER ST., 16TH FLOOR, NEW YORK, NY 10038 AND the Executing Agent named below at 40 E. GILLIAND

IN WITNESS WHEREOF, Seneca Insurance Company, Inc. has caused these presents to be signed by its duly authorized attorney-in-fact, proper for the purpose and its corporate seal to be hereunto affixed this 24 day of November 19 19 6 7.

Bond Amount \$ 2500
 Appearance Date 1974 CALLED Time _____
 Defendant MAILE HALLS
 D.O.B. _____ SS # _____
 Court _____
 City _____ State _____
 Charge _____
 Charge _____ Case No. _____
 If favorite, Original No. _____ Amount \$ _____
 Executing Agent John B. Schaefer
 POA121-0198

Supers

MARCH 1971

Przykłady

2014/01/16 M 11:02:01

**FOR STATE USE ONLY
NOT VALID IF USED IN FEDERAL COURT**



DESIGNED BY: CCENTERSTONE GRAF



180 WATER ST., NEW YORK, NY 10038

No. S 00007014 P. 2

ONLY VALID IF NUMBERED IN RED

QUALIFYING POWER OF ATTORNEY

Valid in CLEARFIELD County only

KNOW ALL MEN BY THESE PRESENTS:

That SENECA INSURANCE COMPANY, INC., a corporation of the State of New York, does hereby make,

constitute and appoint: Joseph Gilliland

its true and lawful attorney-in-fact with full power and authority, for and on behalf of the Company as surety, to execute and deliver and affix the seal of the Company thereto, if a seal is required, on all documents necessary or incidental to the execution of bail bonds not exceeding \$ ~~100,000~~ per bond.

The execution of a bail bond by said attorney-in-fact shall be binding upon this Company as if such bond has been executed and acknowledged by the regularly elected officers of this Company.

SENECA INSURANCE COMPANY, INC. certifies that this appointment is made in accordance with a resolution of the Board of Directors of SENECA INSURANCE COMPANY, INC., by unanimous written consent dated January 1, 1998, a true and exact copy of which follows:

The Company authorizes the President, Executive Vice Presidents, Senior Vice Presidents, and Secretary to appoint attorneys-in-fact or agents who shall have the authority to issue bail bonds in the name of the Company. The signature of any of these authorized Company officers and the Company seal may be affixed by facsimile to a qualifying power of attorney for the execution of a bail bond. The facsimile signature and seal used in this manner is hereby adopted by the Company as the original and, therefore, is binding upon the Company with the same force and effect as though manually affixed.

IN WITNESS WHEREOF, SENECA INSURANCE COMPANY, INC., has caused this document to be signed by its duly authorized officer and its corporate seal to be hereunto affixed this 1st day of January, 1999.

SENECA INSURANCE COMPANY, INC.

Qualifying Power only, not to be attached to any Bond. Valid only if individual Power of Attorney is attached to each Bond executed.



By:

Marc T.A. Wolin, Secretary

State of New York
Borough of Manhattan

NOTARY PUBLIC

The foregoing instrument was acknowledged before me this 1st day of January, 1999, by Marc T.A. Wolin, Secretary, of SENECA INSURANCE COMPANY, INC., a New York Corporation, on behalf of the corporation.

LANCELOT L THOMAS
Notary Public, State of New York
No. 24-4643150
Qualified in Kings County
Notary Expiration Date Commission Expires October 17, 20

Notary Public

Lance Thomas

Print Name

epe

COURT COPY

JOSEPH K GILLILAND

License Number 44451

is licensed to engage in the business of insurance in the Commonwealth of Pennsylvania in the capacity stated below, subject to applicable laws and rules.

LICENSE TYPE	EXPIRATION DATE
Resident Agent	10-14-2001
QUALIFICATIONS	CE REQUIREMENTS
Accident and Health, Casualty and Allied Lines, Life and Fixed Annuities, Property and Allied Lines	Total 24

Licensees must notify the Insurance Department of an address change within 15 days of the move.

The agent cannot produce business until the agent is appointed with the insurer.

If your license is subject to Continuing Education (CE) requirements, the CE requirement MUST BE SATISFIED 60 DAYS before your license expiration date.

JOSEPH K GILLILAND
License Number 44451



is licensed to engage in the business of insurance in the Commonwealth of Pennsylvania in the capacity stated below, subject to applicable laws and rules.

LICENSE TYPE

Resident Agent

EXPIRATION DATE

10-14-2001

QUALIFICATIONS

Accident and Health, Casualty and Allied Lines, Life and Fixed Annuities, Property and Allied Lines

CE REQUIREMENTS

Total	24
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GILLILAND, JOSEPH K
609 OGDEN AVENUE
CLEARFIELD, PA 16830-0000

FILED

SEP 23 1999

SEP 24 1999

e/88

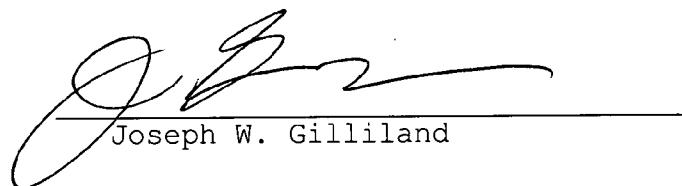
COMMONWEALTH OF PENNSYLVANIA)

ss.

COUNTY OF CLEARFIELD

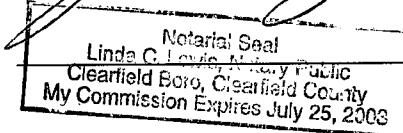
)

Before me, the undersigned officer, personally appeared JOSEPH W. GILLILAND, who being duly sworn according to law, deposes and states that the facts set forth in the foregoing Petition are true and correct to the best of his knowledge, information and belief.



Joseph W. Gilliland

SWORN and SUBSCRIBED before me this 26th day of January, 2002.



FILED

JAN 21 2002

013-3711cc-ath, Naddeo
William A. Shaw
Prothonotary
WAS

——— Lap over margin ———

JAMES A. NADDEO
ATTORNEY AT LAW
211 1/2 EAST LOCUST STREET
P.O. BOX 552
CLEARFIELD, PENNSYLVANIA 16830

CP

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

COMMONWEALTH OF
PENNSYLVANIA for the us of
the COUNTY OF CLEARFIELD,
Plaintiff,

V.

SENECA INSURANCE COMPANY,
INC.,
Defendant.

Defendant.

*
*
*
*
*
*
* No. 00-621-CD

Type of Pleading:

Certificate of
Service

Filed on behalf of:
Defendant

Counsel of Record for
this party:

James A. Naddeo, Esq.
Pa I.D. 06820

P.O. Box 552

211 1/2 E. Locust Street
P.O. Box 552
Clearfield, PA 16830
(814) 765-1601

FILED

JAN 25 2002

William A. Shaw
Prothonotary

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

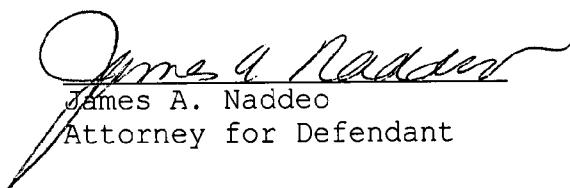
COMMONWEALTH OF *
PENNSYLVANIA for the us of *
the COUNTY OF CLEARFIELD, *
Plaintiff, *
*
v. * No. 00-621-CD
*
SENECA INSURANCE COMPANY, *
INC., *
Defendant. *

CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a certified copy of Defendant's Petition to Open Judgment filed in the above-captioned action was served on the following person and in the following manner on the 25th day of January, 2002:

First-Class Mail, Postage Prepaid

Kim C. Kesner, Esquire
23 North Second Street
Clearfield, PA 16830


James A. Naddeo
Attorney for Defendant

FILED

JAN 25 2002
01/10:43 a.m.
William A. Shaw
Prothonotary
/cc to AHJ naddeo
GPT

——— Lap over margin ———

JAMES A. NADDEO
ATTORNEY AT LAW
211 1/2 EAST LOCUST STREET
P.O. BOX 552
CLEARFIELD, PENNSYLVANIA 16830

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

COMMONWEALTH OF
PENNSYLVANIA for the us of
the COUNTY OF Clearfield,
Plaintiff

vs.

SENECA INSURANCE COMPANY, INC.
Defendant

: No. 00-621-CD
: Type of Case: Civil
: Type of Pleading: Plaintiff's Written
: Response to Defendant's Petition to
: Open Judgment
: File on Behalf of: Plaintiff
: Counsel of Record for this Party:
: Kim C. Kesner, Esquire
: Supreme Ct. I.D. # 28307
: 23 North Second Street
: Clearfield, PA 16830
: 814-765-1706 - phone
: 814-765-7006 - fax
:
:
:
:
:
:

FILED

FEB 12 2002

William A. Shaw
Prothonotary

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

COMMONWEALTH OF : No. 00-621-CD
PENNSYLVANIA for the us of :
the COUNTY OF Clearfield, :
Plaintiff :
: vs. :
: :
SENECA INSURANCE COMPANY, INC. :
Defendant :
:

PLAINTIFF'S WRITTEN RESPONSE TO
DEFENDANT'S PETITION TO OPEN JUDGMENT

TO THE HONORABLE JOHN K. REILLY, JR., PRESIDENT JUDGE:

AND NOW comes the Plaintiff, the County of Clearfield by Kim C. Kesner, Esquire, County Solicitor, and files its written response to Defendant's Petition to Open Judgment:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Strict proof is requested.
7. Strict proof is requested.

NEW MATTER

1. Marie Harris failed to appear and this Court forfeited her bail on February 15, 2000.
2. Pa.R.Crim.P., Rule 536 provides that a bail forfeiture shall not be executed until twenty (20) days after notice of the forfeiture order to give the surety time to produce the

Defendant. Due notice was given by the Prothonotary and the Surety did not produce Marie Harris.

3. Judgment was confessed on the Surety Bond on May 24, 2000.
4. Defendant avers that it produced Marie Harris on December 22, 2001.
5. Defendant's Petition provides no explanation as to why it was unable to return Marie Harris earlier.

6. Pa.R.Crim.P. Rule 536 allows this Court to "...direct that a forfeiture be set aside or remitted if justice does not require the full enforcement of the forfeiture order."

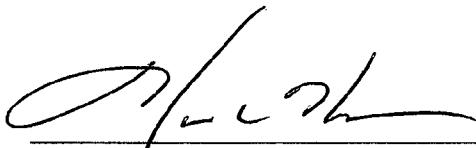
7. Defendant's Petition does not set forth any basis for why justice does not require the full enforcement of the forfeiture order.

8. The setting aside or remitting a portion of a forfeiture is discretionary with the Court.

9. It is respectfully submitted that this Court should not open the judgment and set aside or remit the forfeiture without further inquiry of the Defendant and the District Attorney.

10. The County's entry of a judgment on this Court's forfeiture for the Commonwealth was a ministerial act by the County in furtherance of the Court's forfeiture order. The interest and position of the Court and District Attorney should be addressed directly by each.

Respectfully submitted,



Kim C. Kesner, Esquire
Clearfield County Solicitor

CERTIFICATE OF SERVICE

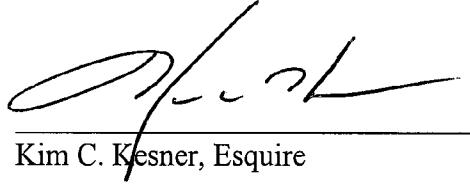
AND NOW, I do hereby certify that on the 12th day of February, 2002, I caused to be served a true and correct copy of the Plaintiff's Written Response to Defendant's Petition to Open Judgment on the following and in the manner indicated below:

By United States Mail, First Class
Postage Prepaid, Addressed as Follows:

James A. Naddeo, Esquire
211 ½ East Locust Street
P.O. Box 552
Clearfield, PA 16830

Paul Cherry, District Attorney
Clearfield County Courthouse
230 East Market Street
Clearfield, PA 16830

Date: February 12, 2002



Kim C. Kesner, Esquire

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION
NO. 00-621-CD

COMMONWEALTH OF PENNSYLVANIA for
the us of the COUNTY OF CLEARFIELD
Plaintiff

vs.

SENECA INSURANCE COMPANY, INC.,
Defendant

Plaintiff's Written Response
to Defendant's Petition to
Open Judgment

FILED

3 CC
0/3/03
FEB 12 2002
Kesner
CJ

William A. Shaw
Prothonotary

KIM C. KESNER
ATTORNEY AT LAW
23 North Second Street
CLEARFIELD, PA 16830
(814) 765-1706