

01-722-CD  
LAWRENCE C. BOTIA, ESQ., et al -vs- JAMES P. DWORENZKY et al

LAWRENCE C. BOLLA, ESQ., ESCROW : IN THE COURT OF COMMON PLEAS  
AND DISBURSING AGENT FOR JAMES : OF CLEARFIELD COUNTY,  
P. DWORETZKY AND LISA A. : PENNSYLVANIA  
DWORETZKY, HIS WIFE, :  
INDIVIDUALLY AND D/B/A L.A.D. :  
UNLIMITED ENTERPRISES, D/B/A FAT :  
BOY'S BAR-B-Q, :  
Plaintiff :  
V. :  
JAMES P. DWORETZKY AND LISA A. :  
DWORETZKY, :  
Defendants :  
: NO. 01-722-C  
FILE

FILED

MAY 14 2001

William A. Shaw  
Prothonotary

**COMPLAINT IN JUDGMENT**

AND NOW, comes the Plaintiff, Lawrence C. Bolla, Esq.,  
Escrow and Disbursing Agent for James P. Dworetzky and Lisa A.  
Dworetzky, His Wife, Individually and d/b/a L.A.D. Unlimited  
Enterprises, d/b/a Fat Boy's Bar-B-Q, by and through his  
attorneys, Quinn, Buseck, Leemhuis, Toohey & Kroto, Inc., and  
file this Complaint in Judgment of which the following is a  
statement:

1. The Plaintiff, Lawrence C. Bolla, Esq., Escrow and Disbursing Agent for James P. Dworetzky and Lisa A. Dworetzky, His Wife, Individually and d/b/a L.A.D. Unlimited Enterprises, d/b/a Fat Boy's Bar-B-Q (hereinafter "Plaintiff"), resides, or was last known to reside at 2222 West Grandview Boulevard, Erie, PA 16506.

2. The Defendants, James P. Dworetzky and Lisa A. Dworetzky, his wife (hereinafter Defendants"), reside, or were

last known to reside at 923 Treasure Lake, DuBois, PA 15801.

3. [X] A. The original or a true and correct reproduction of the original instrument showing the Defendants' signature is attached hereto and the provisions of the warrant therein contained is incorporated herein by reference.

[ ] B. Neither the original nor a reproduction of the original instrument is attached, and is not available for the following reasons:

4. Statement of any assignments: N/A

5. [X] A. No judgment has been entered on the instrument herein sued upon in any jurisdiction.

[ ] B. A prior judgment has been entered on the instrument herein sued upon at:

6. Averment as to default or condition precedent.

The Defendants executed a Demand Note dated April 27, 2001, which is currently due.

7. The following is an itemization of the amount due, as authorized by the instrument:

Principal sum	\$1.00*
Other	\$0.00
Interest from April 27, 2001	\$0.00
Collection/Attorney's Fees	<u>\$0.00</u>
<b>TOTAL</b>	\$1.00

\*\$1.00 and all such sums of money owing, payable and belonging to Lawrence C. Bolla, Esq., Escrow and Disbursing Agent for James P. Dworetzky and Lisa A. Dworetzky, His Wife, Individually and d/b/a L.A.D. Unlimited Enterprises, d/b/a Fat Boy's Bar-B-Q pursuant to the confirmed Plan of Reorganization filed in the United States Bankruptcy Court for the Western District of Pennsylvania, Pittsburgh Division, at Case No. 96-23167BM.

8. If the instrument is more than twenty (20) years old, there is attached hereto a petition and Order of Court granting leave to enter judgment after notice.

9. The Plaintiff avers that judgment is not being entered by confession against a natural person in connection with a consumer credit transaction.

10. Other allegations: N/A

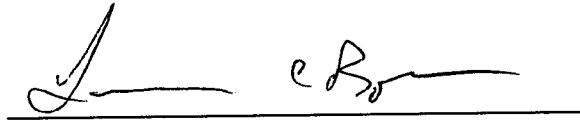
WHEREFORE, the Plaintiff, Lawrence C. Bolla, Esq., Escrow and Disbursing Agent for James P. Dworetzky and Lisa A. Dworetzky, His Wife, Individually and d/b/a L.A.D. Unlimited Enterprises, d/b/a Fat Boy's Bar-B-Q, demands judgment in his favor and against the Defendants, James P. Dworetzky and Lisa A. Dworetzky, his wife, individually and d/b/a L.A.D. Unlimited

Enterprises d/b/a Fat Boy's B-B-Q, in the amount of \$1.00 and all such sums or sums of money owing, payable and belonging to Lawrence C. Bolla, Esq., Escrow and Disbursing Agent for James P. Dworetzky and Lisa A. Dworetzky, His Wife, Individually and d/b/a L.A.D. Unlimited Enterprises, d/b/a Fat Boy's Bar-B-Q pursuant to the confirmed Plan of Reorganization filed in the United States Bankruptcy Court for the Western District of Pennsylvania, Pittsburgh Division, at Case No. 96-23167BM in accordance with the terms of the Warrant.

Respectfully submitted,

QUINN, BUSECK, LEEMHUIS, TOOHEY & KROTO, INC.

By



Lawrence C. Bolla

Pa. I.D. No. 19679

2222 West Grandview Boulevard

Erie, PA 16506-4508

(814) 833-2222

Attorneys for Plaintiff, Lawrence C. Bolla, Esq., Escrow and Disbursing Agent for James P. Dworetzky and Lisa A. Dworetzky, His Wife, Individually and d/b/a L.A.D. Unlimited Enterprises, d/b/a Fat Boy's Bar-B-Q

Sworn to before me this 10<sup>th</sup>

day of May, 2001.

Denise Alford  
Notary Public

Notarial Seal  
Denise Alford, Notary Public  
Millcreek Twp., Erie County  
My Commission Expires Aug. 1, 2002

Pursuant to the terms of the attached warrant of attorney, I hereby appear for the Defendants and confess judgment against Defendants in favor of the above-named Plaintiff(s) in accordance with the itemization set forth in paragraph seven (7) of the within Complaint.

J C Bol

Document #92964

DEMAND NOTE

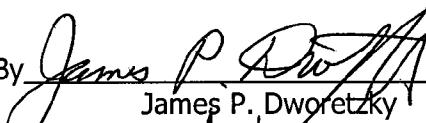
Clearfield County, Pennsylvania

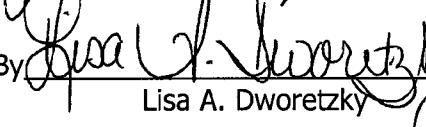
April 27, 2001

ON DEMAND, we the undersigned, jointly and severally promise to pay to the Order of LAWRENCE C. BOLLA, ESQUIRE, ESCROW AND DISBURSING AGENT FOR JAMES P. DWORETZKY AND LISA A. DWORETZKY, HIS WIFE, INDIVIDUALLY AND d/b/a L.A.D. UNLIMITED ENTERPRISES, d/b/a FAT BOYS' BAR-B-Q at its offices located at 2222 West Grandview Boulevard, Erie, PA 16506, the sum of ONE and 00/100 (\$1.00) Dollar and all such sums of money owing, payable and belonging to Lawrence C. Bolla, Esquire, escrow and disbursing agent for James P. Dworetzky and Lisa A. Dworetzky, his wife, individually and d/b/a L.A.D. Unlimited Enterprises, d/b/a Fat Boys' Bar-B-Q pursuant to the confirmed Plan of Reorganization filed in the United States Bankruptcy Court for the Western District of Pennsylvania, Pittsburgh, Division, at Case No. 96-23167BM. This promise is made without defalcation, for value received, with interest at the rate of six (6%) per annum on the unpaid balance, and with the intent to be legally bound thereby.

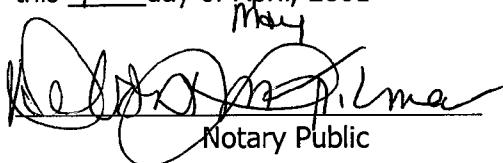
AND FURTHER, the undersigned hereby authorizes and empowers the Prothonotary or any attorney of any court of record within the United States or elsewhere to appear for the undersigned, and, with or without declaration filed and with or without default on the within obligation, confess judgment against the undersigned in favor of the payee or any holder hereof, as of any term for the unpaid balance hereof, the costs of suit, and attorney's commission of fifteen per centum (15%) for collection, with release of errors, without stay of execution of right to appeal, waiving all laws exempting real or personal property from execution, and inquisition and extension upon any levy on real estate are hereby waived and condemnation agreed to, and no benefit or exemption will be claimed under and by virtue of any single exercise of the foregoing power to confess judgment shall be deemed to exhaust the power, whether or not such exercise shall be held by any Court to be valid, voidable or void, but the power shall continue undiminished and it may be exercised from time to time as often as holder shall elect until such time as holder shall have received payment in full of the debt, interest and costs.

THE SIGNATORIES of this Note hereby acknowledge that said Note is signed under seal and hereby adopt the word "(SEAL)" as their own individual seal.

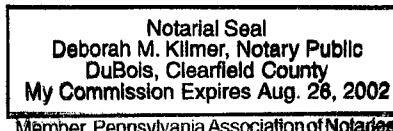
By  (SEAL)  
James P. Dworetzky

By  (SEAL)  
Lisa A. Dworetzky

Sworn to and subscribed before me  
this 14th day of April, 2001

  
Notary Public

Document #90676



Member, Pennsylvania Association of Notaries

LAWRENCE C. BOLLA, ESQ., ESCROW : IN THE COURT OF COMMON PLEAS  
AND DISBURSING AGENT FOR JAMES : OF CLEARFIELD COUNTY,  
P. DWORETZKY AND LISA A. : PENNSYLVANIA  
DWORETZKY, HIS WIFE, :  
INDIVIDUALLY AND D/B/A L.A.D. :  
UNLIMITED ENTERPRISES, D/B/A FAT :  
BOY'S BAR-B-Q, :  
Plaintiff :  
: NO.  
v. :  
: :  
JAMES P. DWORETZKY AND LISA A. :  
DWORETZKY, :  
Defendants :  
:

NOTICE

TO: THE ABOVE DEFENDANTS

You are hereby notified as required by law that a judgment - order - decree has been entered against you in the amount of \$1.00 and all such sums or sums of money owing, payable and belonging to Lawrence C. Bolla, Esq., Escrow and Disbursing Agent for James P. Dworetzky and Lisa A. Dworetzky, His Wife, Individually and d/b/a L.A.D. Unlimited Enterprises, d/b/a Fat Boy's Bar-B-Q pursuant to the confirmed Plan of Reorganization filed in the United States Bankruptcy Court for the Western District of Pennsylvania, Pittsburgh Division, at Case No. 96-23167BM, plus interest and the costs of suit at the above term and number on May 14, 2001.

If a judgment has been entered by confession, you will find enclosed copies of all documents filed in this office in support of the confession of judgment.

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Prothonotary

FILED 4/8/01  
MAY 12 2001  
80.00  
SAC  
William A. Shaw  
Prothonotary  
ICC Party

LAWRENCE C. BOLLA, ESQ., ESCROW AND DISBURSING AGENT FOR JAMES P. DWORETZKY AND LISA A. DWORETZKY, HIS WIFE, INDIVIDUALLY AND D/B/A L.A.D. UNLIMITED ENTERPRISES, D/B/A FAT BOY'S BAR-B-Q, Plaintiff	:	IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
JAMES P. DWORETZKY AND LISA A. DWORETZKY, Defendants	:	NO. 01-722 CD
	:	
	:	
	:	
	:	

PRAECIPE AND POWER OF ATTORNEY  
FOR SATISFACTION AND/OR TERMINATION

TO: THE PROTHONOTARY/CLERK OF SAID COURT:

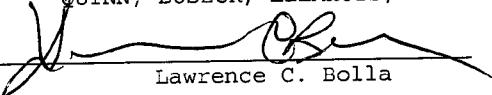
You are hereby authorized, empowered, and directed to enter, as indicated, the following on the records thereof:

- A. 1.  The within suit is settled, discontinued, ended and costs paid.
- 2.  The within suit is settled, discontinued, ended with prejudice and costs paid.
- 3.  The within suit is settled, discontinued, ended without prejudice and costs paid.

- B. 1.  Satisfaction of the Award in the within suit is acknowledged.
- 2.  Satisfaction of Judgment, with interest and costs, in the within matter is acknowledged.

- C.  Other:

Date: 8/16/02

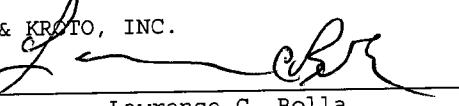
BY   
Lawrence C. Bolla

QUINN, BUSECK, LEEMHUIS, TOOHEY & KROTO, INC.

COST PAYMENT VERIFICATION

I UNDERSTAND THAT THE ABOVE ACTION CANNOT BE FILED AND DOCKETED UNTIL ALL COSTS HAVE BEEN PAID, INCLUDING SHERIFF'S COSTS; AND HEREBY VERIFY THAT ALL COSTS HAVE BEEN PAID. I UNDERSTAND THAT FALSE STATEMENTS HEREIN ARE MADE SUBJECT TO THE PENALTIES OF 18 Pa.C.S. §4904 RELATING TO UNSWORN FALSIFICATION TO AUTHORITIES.

QUINN, BUSECK, LEEMHUIS, TOOHEY & KROTO, INC.

BY   
Lawrence C. Bolla

Document #005

**FILED**

AUG 22 2002

*E  
KCB*

William A. Shaw  
Prothonotary

**COPY**

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

**CIVIL DIVISION**

**CERTIFICATE OF SATISFACTION OF JUDGMENT**

No.: 2001-00722-CD

Lawrence Bolla, Esquire, Escrow and  
Disbursing Agent for James P. Dworetzky  
and Lisa A. Dworetzky, his wife, individually  
and d/b/a L. A. D. Unlimited Enterprises,  
d/b/a Fat Boy's Bar-B-Q

Debt: 1.00

Vs.

Atty's Comm.:

James P. Dworetzky and Lisa A. Dworetzky

Interest From:

Cost: \$7.00

NOW, Thursday, August 22, 2002, directions for satisfaction having been received, and  
all costs having been paid, SATISFACTION was entered of record.

Certified from the record this 22nd day of August, A.D. 2002.

  
\_\_\_\_\_  
Prothonotary