

01-1238-CD  
NATIONAL FUEL RESOURCES, INC. -vs- SEVEN SEAS FINANCIAL  
ASSOCIATES, INC.

NATIONAL FUEL RESOURCES, INC. : IN THE COURT OF COMMON PLEAS  
:   
vs : OF CLEARFIELD COUNTY, PENNSYLVANIA  
:   
SEVEN SEAS FINANCIAL :   
ASSOCIATES, INC. : NO. cd 2001-1238

**PRAECIPE**

TO: THE PROTHONOTARY:

Received satisfaction in full of this judgment, debt,  
interest and costs and hereby discharge the same of record.


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

By



Lawrence C. Bolla, Esquire  
2222 West Grandview Boulevard  
Erie, PA 16506-4508  
(814) 833-2222

Dated: November 2, 2001

FILED Att'y pd.  
7.00  
NOV 05 2001  
(Certificate sent  
to Att'y - NO SASE)  
William A. Shaw  
Prothonotary  


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

**CIVIL DIVISION**

**CERTIFICATE OF SATISFACTION OF JUDGMENT**

National Fuel Resources, Inc.

Vs.

Seven Seas Financial Associates, Inc.

No.: 2001-01238-CD

Debt: \$21,538.46

Atty's Comm.:

Interest From:

Cost: \$7.00

NOW, Monday, November 05, 2001 , directions for satisfaction having been received, and all costs having been paid, SATISFACTION was entered of record.

Certified from the record this 5th day of November, A.D. 2001.

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Prothonotary

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

NATIONAL FUEL RESOURCES, INC.

vs

SEVEN SEAS FINANCIAL  
ASSOCIATES, INC.

:  
:  
:  
:  
:  
:

NO. 01-1238-CD

TYPE OF CASE:

Civil

TYPE OF PLEADING:

Complaint

FILED ON BEHALF OF:

Plaintiff

COUNSEL FOR THIS PARTY:

Lawrence C. Bolla, Esquire  
2222 West Grandview  
Erie, Pennsylvania 16506  
(814)-833-2222

**FILED**

JUL 3 2001

William A. Shaw  
Prothonotary

NATIONAL FUEL RESOURCES, INC. : IN THE COURT OF COMMON PLEAS  
:   
VS : OF CLEARFIELD COUNTY, PENNSYLVANIA  
:   
SEVEN SEAS FINANCIAL :   
ASSOCIATES, INC. : NO.

TO: **Seven Seas Financial Associates, Inc.**

N O T I C E

YOU HAVE BEEN SUED IN COURT. IF YOU WISH TO DEFEND AGAINST THE CLAIMS SET FORTH IN THE FOLLOWING PAGES, YOU MUST TAKE ACTION WITHIN TWENTY (20) DAYS AFTER THIS COMPLAINT AND NOTICE ARE SERVED, BY ENTERING A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILING IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. YOU ARE WARNED THAT IF YOU FAIL TO DO SO, THE CASE MAY PROCEED WITHOUT YOU AND A JUDGMENT MAY BE ENTERED AGAINST YOU BY THE COURT WITHOUT FURTHER NOTICE FOR ANY MONEY CLAIMED IN THE COMPLAINT OR FOR ANY OTHER CLAIM OR RELIEF REQUESTED BY THE PLAINTIFF. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS IMPORTANT TO YOU.

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

Raymond Billotte  
Court Administrator  
2nd floor, Court House  
Clearfield, Pennsylvania 16830  
814-765-2641 (ext 50)

NATIONAL FUEL RESOURCES, INC. : IN THE COURT OF COMMON PLEAS  
:   
VS : OF CLEARFIELD COUNTY, PENNSYLVANIA  
:   
SEVEN SEAS FINANCIAL :   
ASSOCIATES, INC. : NO.

PURSUANT TO PROVISIONS OF THE FEDERAL FAIR DEBT  
COLLECTION PRACTICE ACT, YOU ARE ADVISED AND WARNED  
THAT THIS IS AN ATTEMPT TO COLLECT A DEBT AND ANY  
INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.  
SEE 15 U.S.C. §1692(e)(11).

NATIONAL FUEL RESOURCES,	:	IN THE COURT OF COMMON PLEAS
INC.,	:	
Plaintiff	:	OF CLEARFIELD COUNTY,
	:	PENNSYLVANIA
v.	:	
	:	CIVIL ACTION
SEVEN SEAS FINANCIAL	:	
ASSOCIATES, INC.,	:	NO.
Defendant	:	

CIVIL ACTION

AND NOW, comes the Plaintiff, National Fuel Resources, Inc., by and through its attorneys, Quinn, Buseck, Leemhuis, Toohey & Kroto, Inc., and files this Civil Action Complaint of which the following is a statement:

1. The Plaintiff, National Fuel Resources, Inc., is a New York corporation with a place of business situate at 165 Lawrence Bell Drive, Suite 120, Williamsville, New York, and is in the business of selling natural gas to various commercial accounts.

2. The Defendant, Seven Seas Financial Associates, Inc., is a Pennsylvania corporation with a place of business situate at Ramada Inn - DuBois, Route 255 and I-80, DuBois, Pennsylvania.

3. Pursuant to the provisions of the Federal Fair Debt Collection Practices Act [15 U.S.C. §1692(g)] attached hereto as Exhibit "A" - DEBT VALIDATION STATEMENT.

COUNT I

4. The Plaintiff incorporates by reference each and every allegation contained in paragraphs one (1) through three (3) above as fully as though the same were set forth herein at length.

5. The Plaintiff, National Fuel Resources, Inc., entered into an agreement with the Defendant to provide natural gas to the Defendant; and the Plaintiff opened an account for the Defendant and assigned the Defendant Account Number 3656316 (the "Defendant's Account").

6. For and in consideration of the Plaintiff supplying natural gas as stated in the agreement, the Defendant expressly or implicitly promised to pay the Plaintiff the amount charged to the Defendant's Account for the gas service.

7. The Plaintiff has kept accurate records of the amount of gas supplied by the Plaintiff under the aforementioned account, as well as all debits and credits to that account, and the Plaintiff has sent the Defendant statements of the account on a regular basis which summarize this information.

8. Attached hereto as Exhibit "B" is a statement of account indicating the outstanding amounts due for natural gas supplied by Plaintiff to Defendant.



9. The Defendant has never disputed the Plaintiff's statement of account.

10. As of the date of the last statement of account, the Defendant owed the Plaintiff Twenty-one Thousand Five Hundred Thirty-eight and 46/100 (\$21,538.46) Dollars for natural gas supplied on this account.

11. The Plaintiff has demanded that the Defendant pay the Plaintiff the aforementioned amount; but the Defendant is either unable or unwilling to pay the amount due.

WHEREFORE, the Plaintiff demands judgment against the Defendant, above captioned, in the amount of Twenty-one Thousand Five Hundred Thirty-eight and 46/100 (\$21,538.46) Dollars, plus interest, plus the costs incurred as a result of this action.

#### COUNT II

12. The Plaintiff incorporates by reference each and every allegation contained in paragraphs one (1) through eleven (11) above as fully as though the same were set forth herein at length.

13. The Defendant, Seven Seas Financial Associates, Inc., is the owner of and/or occupies the premises to which the Plaintiff supplied gas service. As such, the Defendant received the benefit of the gas service.

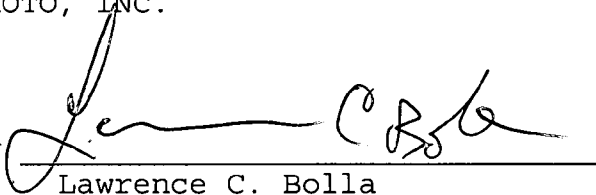
14. It would be inequitable and unconscionable and the Defendant would thereby be unjustly enriched if it is permitted to retain the benefits of the gas service without paying for the same.

WHEREFORE, the Plaintiff demands judgment against the Defendant, above captioned, in the amount of Twenty-one Thousand Five Hundred Thirty-eight and 46/100 (\$21,538.46) Dollars, plus interest, plus the costs incurred as a result of this action.

Respectfully Submitted,

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

By



Lawrence C. Bolla  
2222 West Grandview Boulevard  
Erie, PA 16506-4509  
(814) 833-2222  
Attorneys for Plaintiff, National  
Fuel Resources, Inc.

EXHIBIT "A"

NATIONAL FUEL RESOURCES, INC.	:	IN THE COURT OF COMMON PLEAS
	:	
VS	:	OF CLEARFIELD COUNTY, PENNSYLVANIA
	:	
SEVEN SEAS FINANCIAL	:	
ASSOCIATES, INC.	:	NO.

DEBT VALIDATION STATEMENT

1. The amount of the debt is \$21,538.46.
2. The name of the creditor to whom the debt is owed is National Fuel Resources, Inc.
3. Unless Defendant(s), Seven Seas Financial Associates, Inc., within thirty days after receipt of this Notice, disputes the debt validity, or any portion thereof, the attorney signing this Complaint will assume the debt to be valid.
4. If Defendant(s), Seven Seas Financial Associates, Inc., notifies the attorney signing this Complaint in writing within the thirty day period that the debt or any portion thereof is disputed, the attorney will obtain verification of the debt or a copy of a judgment against Seven Seas Financial Associates, Inc., and the attorney will mail a copy of such verification or judgment to Seven Seas Financial Associates, Inc.; and if appropriate,
5. A statement that, upon Seven Seas Financial Associates, Inc. written request within the thirty day period, the attorney will provide Seven Seas Financial Associates, Inc. with the original creditor's name and address if different from the current creditor.

## STATEMENT

15801

SEVEN SEAS FINANCIAL ASSOC.  
ACCOUNTS PAYABLE  
RAMADA INN - DUBOIS  
RTE 255 & I-80  
DUBOIS, PA 15801

Statement Date: 06/29/01

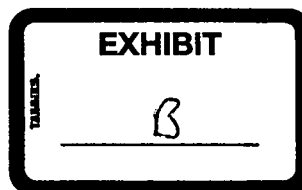
Page: 1

Account Number: 3656316

<u>Document</u>	<u>Date</u>	<u>Code</u>		<u>Debits</u>	<u>Credits</u>
1494281	03/06/01	Invoice	\$	8,928.03	
1515700	03/27/01	Invoice	\$	4,535.92	
1548549	04/27/01	Invoice	\$	4,134.16	
36265	05/21/01	Finance Charge Memo	\$	892.62	
1586256	05/30/01	Invoice	\$	2,796.48	
37432	06/13/01	Finance Charge Memo	\$	251.25	

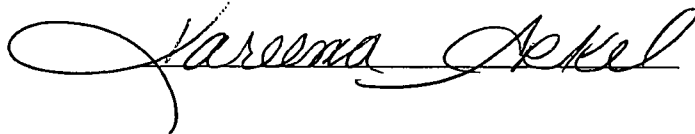
Statement Balance

21,538.46




VERIFICATION

I, Kareema Arkel, representative of National Fuel Resources, Inc., depose and say that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief. This statement is made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

A handwritten signature in cursive script, reading "Kareema Arkel", written over a horizontal line.

DATED: July 23, 2001

FILED

 JUL 3 11 2001  
MAG. SO. Ethy Balla  
William A. Shaw  
Prothonotary

PD 880.00

1 cc Sherry

**In The Court of Common Pleas of Clearfield County, Pennsylvania**

Sheriff Docket # 11317

NATIONAL FUEL RESOURCES, INC.

01-1238-CD

VS.

SEVEN SEAS FINANCIAL ASSOCIATES, INC.

**COMPLAINT**

**SHERIFF RETURNS**

NOW AUGUST 2, 2001 AT 2:20 PM DST SERVED THE WITHIN COMPLAINT ON SEVEN SEAS FINANCIAL ASSOCIATES, INC., DEFENDANT AT EMPLOYMENT, RAMADA INN-DUBOIS, RT. 255 & I-80 INTERSECTION, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO PATRICIA PENNY, GUEST SERVICE REP., A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN TO HER THE CONTENTS THEREOF.  
SERVED BY: COUDRIET

**Return Costs**

Cost	Description
30.35	SHFF. HAWKINS PAID BY: ATTY.
10.00	SURCHARGE PAID BY: ATTY.

Sworn to Before Me This

7<sup>th</sup> Day Of Aug 2001

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

So Answers,

*Chester A. Hawkins*  
*by Maury Hamer*  
Chester A. Hawkins  
Sheriff

FILED  
AUG 07 2001

Willie  
Pro

NATIONAL FUEL RESOURCES, INC. : IN THE COURT OF COMMON PLEAS  
VS : OF CLEARFIELD COUNTY, PENNSYLVANIA  
SEVEN SEAS FINANCIAL :  
ASSOCIATES, INC. : NO. cd 2001-1238

PRAECIPE FOR ENTRY OF DEFAULT JUDGMENT

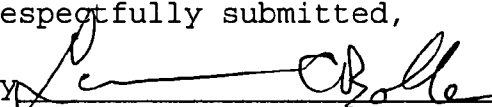
TO: THE PROTHONOTARY

Pursuant to Pa.R.C.P. 237.1, I hereby certify as attorney for the above-named Plaintiff that a written notice of intention to file praecipe for default judgment was mailed or delivered to the above-named Defendant(s), who is the party against whom judgment is to be entered and to his attorney of record, if any, after the default occurred and at least ten (10) days prior to the date of the filing of this Praecipe. A copy of said notice is attached hereto and made a part hereof.

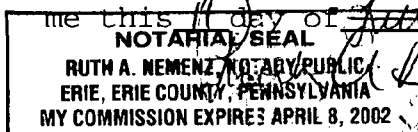
Therefore, please enter default judgment against the Defendant(s), above-captioned, in the sum of \$21,538.46, plus interest from 7/30/01, and all costs of suit for failure to answer or otherwise plead.

Respectfully submitted,

By

  
Lawrence C. Bolla, Esquire  
2222 West Grandview Boulevard  
Erie, PA 16506-4508  
(814) 833-2222

Sworn to and subscribed before  
me this 11 day of September 2001



**FILED**

SEP 14 2001

William A. Shaw  
Prothonotary



FILED

SEP 14 2001

William A. Shaw  
Prothonotary

Att'y pd.  
20.00

*[Handwritten signature]*

COPY

NATIONAL FUEL RESOURCES, INC. : IN THE COURT OF COMMON PLEAS  
VS : OF CLEARFIELD COUNTY PENNSYLVANIA  
SEVEN SEAS FINANCIAL :  
ASSOCIATES, INC. : NO. cd 2001-1238

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 \$21,538.46, plus interest from 7/30/01, plus the costs of suit at the above term and number on September 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.

Prothonotary

COPY

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

National Fuel Resources, Inc.  
Plaintiff(s)

No.: 2001-01238-CD

Real Debt: \$21,538.46

Atty's Comm:

Vs.

Costs: \$

Int. From:

Seven Seas Financial Associates, Inc.  
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: September 14, 2001

Expires: September 14, 2006

Certified from the record this 14th day of September, 2001.

\_\_\_\_\_  
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