

01-1329-C
SHARKEY PICCIRILLO, LLP -vs- FRANK REZK

THE HOPKINS LAW FIRM

900 Beaver Drive, DuBois, Pennsylvania 15801
VOICE: (814) 375-0300 FAX: (814) 375-5035

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA
(CIVIL DIVISION)

SHARKEY PICCIRILLO, LLP,
Plaintiff

vs. : No. 01- 1329 C.D.

FRANK REZK,
Defendant

: Type of Pleading: Complaint

: Filed on behalf of Sharkey
Piccirillo, LLP

: Counsel of Record for this party:

: DAVID J. HOPKINS, ESQUIRE
Attorney at Law
Supreme Court No. 42519

: 900 Beaver Drive
DuBois, Pennsylvania 15801

: (814) 375-0300

FILED

AUG 17 2001

**William A. Shaw
Prothonotary**

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA
(CIVIL DIVISION)

SHARKEY PICCIRILLO, LLP, :
Plaintiff :
: :
vs. : No. 01- C.D.
: :
FRANK REZK, :
Defendant :
:

NOTICE

TO: Defendant Frank Rezk:

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.

Office of the Court Administrator
Clearfield County Courthouse
1 North Second Street
Clearfield, PA 16830
(814) 765-2641 (ext. 5982)

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA
(CIVIL DIVISION)

SHARKEY PICCIRILLO, LLP,	:	
Plaintiff	:	
	:	
vs.	:	No. C.D.
	:	
FRANK REZK,	:	
Defendant	:	

COMPLAINT

AND NOW, comes Plaintiff, SHARKEY PICCIRILLO, LLP, by and through its attorneys, The Hopkins Law Firm, and files the within Complaint against the Defendant as follows:

COUNT I

1. Plaintiff SHARKEY PICCIRILLO, LLP is a Pennsylvania limited liability partnership whose business address is 991 Beaver Drive, DuBois, Pennsylvania 15801.
2. Defendant FRANK REZK is an adult individual who resides at 112 South 7th Street, P.O. Box 555, Indiana, Pennsylvania 15701.
3. Plaintiff is a certified public accounting firm providing accounting services to individuals and entities throughout the Commonwealth of Pennsylvania.
4. Defendant requested Plaintiff to perform accounting services for Defendant for the years 1995 through 1999. Plaintiff completed same in a professional manner.
5. Plaintiff invoiced Defendant as set forth on Exhibit "A".
6. Plaintiff has demanded payment that Defendant has refused to tender.

7. The actions of the Defendant constitute breach of contract entitling Plaintiff to an award of damages in the amount of \$11,150.00.

WHEREFORE, Plaintiff demands judgment against the Defendant, Frank Rezk, in the amount of \$11,150.00 plus pre-judgment, post-judgment interest, costs of suit and such other relief as the Court deems fair, just and equitable.

Respectfully submitted



David J. Hopkins, Esquire
900 Beaver Drive
DuBois, PA 15801
(814) 375-0300

VERIFICATION

I hereby verify that the statements made in this pleading are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S.A. Section 4904, relating to Unsworn Falsification to Authorities.



Michael Piccirillo
Michael Piccirillo

SHARKEY PICCIRILLO, LLP
991 BEAVER DRIVE
DUBOIS, PA 15801

Statement

DATE

8/7/2001

FRANK REZK P.O-BOX-555 INDIANA, PA 15701
--

AMOUNT DUE	AMOUNT ENC.
\$11,150.00	

DATE	TRANSACTION		AMOUNT	BALANCE
12/31/1994	Balance forward			0.00
10/04/1995	INV #95-671		2,550.00	2,550.00
10/26/1995	PMT		-1,550.00	1,000.00
04/17/1996	PMT		-500.00	500.00
09/30/1996	INV #96-677		5,375.00	5,875.00
09/30/1997	INV #97-682		2,250.00	8,125.00
05/13/1998	PMT		-450.00	7,675.00
10/13/1998	PMT		-200.00	7,475.00
11/20/1998	INV #98-657		2,750.00	10,225.00
11/23/1999	INV #99-691		925.00	11,150.00
CURRENT	1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE
0.00	0.00	0.00	0.00	11,150.00
				\$11,150.00

Exhibit "A"

THE HOPKINS LAW FIRM

900 Beaver Drive, DuBois, Pennsylvania 15801
VOICE: (814) 375-0300 FAX: (814) 375-5035

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA
(CIVIL DIVISION)

SHARKEY PICCIRILLO, LLP,
Plaintiff

vs.

No. 01- 1329 C.D.

FRANK REZK,
Defendant

Type of Pleading: Petition for
Special Relief for Alternative Service

Filed on behalf of Sharkey
Piccirillo, LLP

Counsel of Record for this party:

DAVID J. HOPKINS, ESQUIRE
Attorney at Law
Supreme Court No. 42519

900 Beaver Drive
DuBois, Pennsylvania 15801

(814) 375-0300

FILED

OCT 11 2001

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA
(CIVIL DIVISION)

SHARKEY PICCIRILLO, LLP, :
Plaintiff :
vs. : No. 01-1032 C.D.
FRANK REZK, :
Defendant :
:

PETITION FOR SPECIAL RELIEF FOR ALTERNATIVE SERVICE

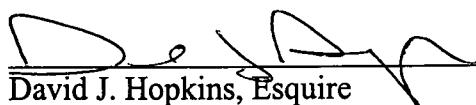
AND NOW, comes Plaintiff, SHARKEY PICCIRILLO, LLP, by and through its attorneys, The Hopkins Law Firm, and says as follows:

1. Your Petitioner is Sharkey Piccirillo, LLP, a limited liability partnership with a principal place of business at 991 Beaver Drive, DuBois, Pennsylvania 15801.
2. The Defendant in the above captioned matter is Frank Rezk who is believed to maintain an address at 112 South 7th Street, Indiana, Pennsylvania 15701.
3. August 17, 2001, Plaintiff filed a Complaint for unpaid accounting services.
4. Plaintiff attempted service upon the Defendant through the Sheriff of Indiana County. The Sheriff was unable to complete service and advised Plaintiff's counsel that Defendant continues to rent 112 South 7th Street, Indiana, Pennsylvania 15701, however, he only stops at the rental unit about once a month.
5. Defendant also maintains a post office box at 555 Indiana, Pennsylvania 15701.

6. Petitioner requests this Honorable Court enter an Order authorizing Plaintiff to serve Defendant by regular mail at 112 South 7th Street, Indiana, Pennsylvania 15701 and at P.O. Box 555, Indiana, Pennsylvania 15701.

WHEREFORE, Petitioner requests this Honorable Court enter an Order authorizing Plaintiff to serve Defendant by regular mail at 112 South 7th Street, Indiana, Pennsylvania 15701 and at P.O. Box 555, Indiana, Pennsylvania 15701.

Respectfully submitted



David J. Hopkins, Esquire
900 Beaver Drive
DuBois, PA 15801
(814) 375-0300

✓

THE HOPKINS LAW FIRM

900 Beaver Drive, DuBois, Pennsylvania 15801
VOICE (814) 375-0300 FAX: (814) 375-5035

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA
(CIVIL DIVISION)

SHARKEY PICCIRILLO, LLP,
Plaintiff

vs. : No. 01- 1329 C.D.

FRANK REZK,
Defendant

ORDER

AND NOW, this 15th day of October, 2001, upon consideration of the foregoing Petition for Special Relief, the Plaintiffs are granted leave to make service of the Complaint on Defendant Frank Rezk, by serving Defendant Frank Rezk by regular mail at 112 South 7th Street, Indiana, Pennsylvania 15701 and at P.O. Box 555, Indiana, Pennsylvania 15701.

BY THE COURT,

JUDGE

FILED

REC OCT 15 2001
CLEARFIELD COUNTY PROTHONOTARY
William A. Shaw
Prothonotary

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 11407

SHARKEY PICCIRILLO, LLP

01-1329-CD

VS.

REZK, FRANK

COMPLAINT

SHERIFF RETURNS

NOW AUGUST 22, 2001, DONALD BECKWITH, SHERIFF OF INDIANA COUNTY
WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY
TO SERVE THE WITHIN COMPLAINT ON FRANK REZK, DEFENDANT.

NOW SEPEMBER 23, 2001 ATTEMPTED TO SERVE THE WITHIN COMPLAINT ON
FRANK REZK, DEFENDANT BY DEPUTIZING THE SHERIFF OF INDIANA COUNTY.
THE RETURN OF SHERIFF BECKWITH IS HERETO ATTACHED AND MADE A PART
OF THIS RETURN MARKED "NOT FOUND".

Return Costs

Cost	Description
23.89	SHFF. HAWKINS PAID BY ATTY..
35.00	SHFF. BECKWITH PAID BY: ATTY.
10.00	SURCHARGE PAID BY: ATTY.

FILED
07340
OCT 18 2001

William A. Shaw
Prothonotary

Sworn to Before Me This

18th Day Of October 2001
William A. Shaw

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

So Answers,

Chester A. Hawkins
by Marilyn Hamm
Chester A. Hawkins
Sheriff





INDIANA COUNTY SHERIFF

825 PHILADELPHIA STREET
INDIANA, PENNSYLVANIA 15701
(724) 465-3930
FAX: (724) 465-3937

Donald L. Beckwith
Sheriff
David J. Rostis
Chief Deputy Sheriff

PAGE: 599

CASE NUMBER: 01-1329 CD (Clearfield CO.)
AFFIDAVIT OF SERVICE

NOW, _____, AT _____ M. SERVED

THE WITHIN _____

UPON _____

AT _____

BY HANDING TO _____

TRUE AND CORRECT COPY(S) OF THE WITHIN _____

AND MAKING KNOWN TO HIM/HER/ THEM THE CONTENTS THEREOF:

//////////

NOW, 09-23-2001, AFTER DILIGENT SEARCH AND INQUIRY

FAILED TO FIND THE WITHIN Frank Rezk

WITHIN MY BAILIWICK. REASON UNABLE TO LOCATE: The address given is a rental property
that is used for storage. According to landlord, he shows up once every one or two
months. He is to be residing in Indiana County but could not find an address

SO ANSWERS:

Donald L. Beckwith
DONALD L. BECKWITH, SHERIFF

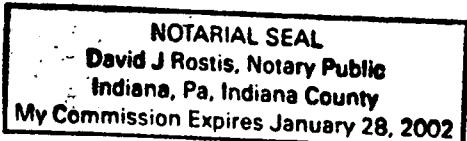
BY:

J. Dennis Porter

J. Dennis Porter, DEPUTY

SWORN AND SUBSCRIBED BEFORE ME.
THIS 24th DAY OF Sept 01

David J. Rostis



COSTS: \$35.00 paid



Sheriff's Office Clearfield County

OFFICE (814) 765-2641
AFTER 4:00 P.M. (814) 765-1533
CLEARFIELD COUNTY FAX
(814) 765- 5915

CHESTER A. HAWKINS
SHERIFF

COURTHOUSE
1 NORTH SECOND STREET, SUITE 116
CLEARFIELD, PENNSYLVANIA 16830

DARLENE SHULTZ
CHIEF DEPUTY

MARILYN HAMM
DEPT. CLERK

MARGARET PUTT
OFFICE MANAGER

PETER F. SMITH
SOLICITOR

DEPUTATION

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

SHARKEY PICCIRILLO, LLP

SERVE BY: 9/16/01

VS
FRANK REZK

TERM & NO. 01-1329-CD

DOCUMENT TO BE SERVED:

COMPLAINT

SERVE: FRANK REZK

ADDRESS: 112 South 7th St., PO Box 555, Indiana, Pa. 15701

Know all men by these presents, that I, CHESTER A. HAWKINS, HIGH SHERIFF of CLEARFIELD COUNTY, State of Pennsylvania, do hereby deputize the SHERIFF of INDIANA County Pennsylvania to execute this writ.

This Deputation being made at the request and risk of the Plaintiff this 22nd day of AUGUST 2001.

MAKE REFUND PAYABLE TO: HOPKINS LAW FIRM

Respectfully,

CHESTER A. HAWKINS,
SHERIFF OF CLEARFIELD COUNTY

THE HOPKINS LAW FIRM

900 Beaver Drive, DuBois, Pennsylvania 15801
VOICE: (814) 375-0300 FAX: (814) 375-5035

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA
(CIVIL DIVISION)

SHARKEY PICCIRILLO, LLP,
Plaintiff

vs.

No. 01-1329 C.D.

FRANK REZK,
Defendant

Type of Pleading: Complaint

Filed on behalf of Sharkey
Piccirillo, LLP

Counsel of Record for this party:

DAVID J. HOPKINS, ESQUIRE
Attorney at Law
Supreme Court No. 42519

900 Beaver Drive
DuBois, Pennsylvania 15801

(814) 375-0300

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

AUG 17 2001

2001 AUG 23 A 10:47

INDIANA COUNTY SHERIFF

Attest.

William L. Ober
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA
(CIVIL DIVISION)

SHARKEY PICCIRILLO, LLP,
Plaintiff

vs. : No. 01- C.D.

FRANK REZK,
Defendant

NOTICE

TO: Defendant Frank Rezk:

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.

Office of the Court Administrator
Clearfield County Courthouse
1 North Second Street
Clearfield, PA 16830
(814) 765-2641 (ext. 5982)

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA
(CIVIL DIVISION)

SHARKEY PICCIRILLO, LLP, :
Plaintiff :
vs. : No. 01-¹³²⁴ C.D.
FRANK REZK, :
Defendant :
:

COMPLAINT

AND NOW, comes Plaintiff, SHARKEY PICCIRILLO, LLP, by and through its attorneys, The Hopkins Law Firm, and files the within Complaint against the Defendant as follows:

COUNT I

1. Plaintiff SHARKEY PICCIRILLO, LLP is a Pennsylvania limited liability partnership whose business address is 991 Beaver Drive, DuBois, Pennsylvania 15801.
2. Defendant FRANK REZK is an adult individual who resides at 112 South 7th Street, P.O. Box 555, Indiana, Pennsylvania 15701.
3. Plaintiff is a certified public accounting firm providing accounting services to individuals and entities throughout the Commonwealth of Pennsylvania.
4. Defendant requested Plaintiff to perform accounting services for Defendant for the years 1995 through 1999. Plaintiff completed same in a professional manner.
5. Plaintiff invoiced Defendant as set forth on Exhibit "A".
6. Plaintiff has demanded payment that Defendant has refused to tender.

7. The actions of the Defendant constitute breach of contract entitling Plaintiff to an award of damages in the amount of \$11,150.00.

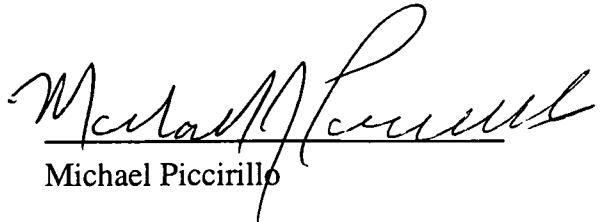
WHEREFORE, Plaintiff demands judgment against the Defendant, Frank Rezk, in the amount of \$11,150.00 plus pre-judgment, post-judgment interest, costs of suit and such other relief as the Court deems fair, just and equitable.

Respectfully submitted


David J. Hopkins, Esquire
900 Beaver Drive
DuBois, PA 15801
(814) 375-0300

VERIFICATION

I hereby verify that the statements made in this pleading are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S.A. Section 4904, relating to Unsworn Falsification to Authorities.


Michael Piccirillo

SHARKEY PICCIRILLO, LLP
991 BEAVER DRIVE
DUBOIS, PA 15801

Statement

DATE
8/7/2001

TO:

FRANK REZK
P O BOX 555
INDIANA, PA 15701

AMOUNT DUE	AMOUNT ENC.
\$11,150.00	

DATE	TRANSACTION	AMOUNT	BALANCE
12/31/1994	Balance forward		0.00
10/04/1995	INV #95-671	2,550.00	2,550.00
10/26/1995	PMT	-1,550.00	1,000.00
04/17/1996	PMT	-500.00	500.00
09/30/1996	INV #96-677	5,375.00	5,875.00
09/30/1997	INV #97-682	2,250.00	8,125.00
05/13/1998	PMT	-450.00	7,675.00
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11/20/1998	INV #98-657	2,750.00	10,225.00
11/23/1999	INV #99-691	925.00	11,150.00
CURRENT	1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE
0.00	0.00	0.00	0.00
	OVER 90 DAYS PAST DUE	AMOUNT DUE	
	11,150.00	\$11,150.00	

THE HOPKINS LAW FIRM

900 Beaver Drive, DuBois, Pennsylvania 15801
VOICE: (814) 375-0300 FAX: (814) 375-5035

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA
(CIVIL DIVISION)

SHARKEY PICCIRILLO, LLP,
Plaintiff

vs. : No. 01-1329 C.D.

FRANK REZK,
Defendant

: Type of Pleading: Praeclipe to Reinstate
: Complaint

: Filed on behalf of: Sharkey Piccirillo, LLP,
: Plaintiff

: Counsel of Record for this party:

: DAVID J. HOPKINS, ESQUIRE
: Attorney at Law
: Supreme Court No. 42519

: 900 Beaver Drive
: DuBois, Pennsylvania 15801

: (814) 375-0300

FILED

OCT 23 2001

William A. Shaw
Prothonotary

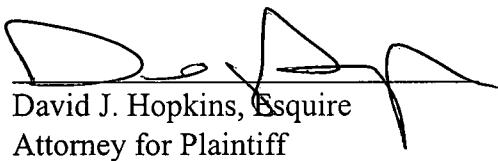
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA
(CIVIL DIVISION)

SHARKEY PICCIRILLO, LLP, :
Plaintiff :
vs. :
No. 01-1329 C.D.
FRANK REZK, :
Defendant :
:

PRAECIPE TO REINSTATE COMPLAINT

Kindly reinstate the Complaint filed in the above captioned matter.

Respectfully submitted,



David J. Hopkins, Esquire
Attorney for Plaintiff

THE HOPKINS LAW FIRM

900 Beaver Drive, DuBois, Pennsylvania 15801
VOICE: (814) 375-0300. FAX: (814) 375-5035

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA
(CIVIL DIVISION)

SHARKEY PICCIRILLO, LLP,
Plaintiff

vs. : No. 01- 1329 C.D.

FRANK REZK,
Defendant

: Type of Pleading: Praeclipe for
Default Judgment

: Filed on behalf of: Sharkey Piccirillo, LLP,
Plaintiff

: Counsel of Record:

: DAVID J. HOPKINS, ESQUIRE
Attorney at Law
Supreme Court No. 42519

: 900 Beaver Drive
DuBois, Pennsylvania 15801

: (814) 375-0300

FILED

DEC 19 2001

**William A. Shaw
Prothonotary**

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA
(CIVIL DIVISION)

SHARKEY PICCIRILLO, LLP, :
Plaintiff :
vs. : No. 01- 1329 C.D.
FRANK REZK, :
Defendant :
.

PRAECIPE FOR DEFAULT JUDGMENT

TO THE PROTHONOTARY:

Please enter a Default Judgment against Defendant Frank Rezk in the amount of \$11,150.00 for his failure to file an Answer to Plaintiff's Complaint. Plaintiff filed a Complaint on August 17, 2001. Said Complaint was mailed on October 24, 2001 by regular mail pursuant to an Order dated October 15, 2001. On November 27, 2001, Plaintiff mailed a 10-day Notice and Defendant Frank Rezk has failed to file an Answer within the required time period.

Respectfully submitted,



David J. Hopkins, Esquire

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA
(CIVIL DIVISION)

SHARKEY PICCIRILLO, LLP, :
Plaintiff :
vs. : No. 01- 1329 C.D.
FRANK REZK, :
Defendant :
:

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the Praeclipe for Default Judgment of filed on behalf of Plaintiff, Sharkey Piccirillo, LLP, was forwarded on the 19th day of December, 2001 by U.S. Mail, postage prepaid, to all counsel of record, addressed as follows:

Frank Rezk
P.O. Box 555
Indiana, PA 15701



David J. Hopkins, Esquire
900 Beaver Drive
DuBois, PA 15801
Supreme Court No. 74456

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA
(CIVIL DIVISION)

COPY

SHARKEY PICCIRILLO, LLP,
Plaintiff

vs.

: No. 01- 1329 C.D.

FRANK REZK,
Defendant

To: Mr. Frank Rezk
P.O. Box 555
Indiana, PA 15701

JUDGMENT NOTICE

Please take note that judgment has been entered against you in the amount of
\$11,150.00.

Dated 12/19/10



Prothonotary

COPY

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

Sharkey Piccirillo, LLP
Plaintiff(s)

No.: 2001-01329-CD

Real Debt: \$11,150.00

Atty's Comm:

Vs. Costs: \$

Int. From:

Frank Rezk
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: December 19, 2001

Expires: December 19, 2006

Certified from the record this 19th of December, 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