

03-1245-CD
NATIONAL LEGAL RESEARCH GROUP, INC. vs. RONALD ARCHER

NATIONAL LEGAL RESEARCH GROUP, INC.
Plaintiff

v.

RONALD E. ARCHER

Defendant

: IN THE COURT OF COMMON PLEAS
: CLEARFIELD COUNTY, PENNSYLVANIA
:
: NO. *03-1245-cd*
: CIVIL DIVISION - LAW
:

NOTICE

YOU HAVE BEEN SUED IN COURT. IF YOU WISH TO DEFEND AGAINST THE CLAIM 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 AN 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.

DAVID S. MEHOLICK, COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
1 NORTH SECOND STREET
CLEARFIELD PA 16830
814-765-2641, EXT. 32

FILED

AUG 21 2003

William A. Shaw
Prothonotary/Clerk of Courts

NOTICA

LE HAN DEMANDADO A USTED EN LA CORTE. SI USTED QUIERE DEFENDERSE DE ESTAS DEMANDAS EXPUESTAS EN LAS PAGINAS SIGUIENTES, USTED TIENE VEINTE (20) DIAS DE PLAZO AL PARTIR DE LA FECHA DE LA DEMANDA Y LA NOTIFICACION. USTED DEBE PRESENTAR UNA APARIENCIA ESCRITA O EN PERSONA O POR ABOGADO Y ARCHIVAR EN LA CORTE EN FORMA ESCRITA SUS DEFENSAS O SUS OBJECCIONES A LAS DEMANDAS EN CONTRA DE SU PERSONA. SEA AVISADO QUE SI USTED NO SE DEFIENDE, LA CORTE TOMARA MEDIDAS Y PUEDA ENTRAR UNA ORDEN CONTRA USTED SIN PREVIO AVISO O NOTIFICACION Y POR CUALQUIER QUEJA O ALIVIO QUE ES PEDIDO EN LA PETICION DE DEMANDA. USTED PUEDE PERDER DINERO O SUS PROPIEDADES O OTROS DERECHOS IMPORTANTES PARA USTED.

LLEVE ESTA DEMANDA A UN ABOGADO IMMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

DAVID S. MEHOLICK, COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
1 NORTH SECOND STREET
CLEARFIELD PA 16830
814-765-2641, EXT. 32

NATIONAL LEGAL RESEARCH GROUP, INC. : IN THE COURT OF COMMON PLEAS
Plaintiff : CLEARFIELD COUNTY, PENNSYLVANIA
v. :
: NO.
RONALD E. ARCHER : CIVIL DIVISION - LAW
Defendant :
:

COMPLAINT

The Plaintiff, NATIONAL LEGAL RESEARCH GROUP, INC. by it's attorneys, **KNUPP, KODAK & IMBLUM, P.C.**, brings this action of Assumpsit against the Defendant to recover the sum of ONE THOUSAND, SEVEN HUNDRED SEVENTEEN DOLLARS AND SEVENTY-FOUR CENTS (\$1,717.74), along with interest thereon, upon a cause of action of which the following is a statement:

1. The Plaintiff, NATIONAL LEGAL RESEARCH GROUP, INC., is a corporation organized and existing under the laws of the state of Virginia, having its principal office and place of business at 2421 Ivy Road, Charlottesville, Virginia 22906-7187.
2. The Defendant, RONALD E. ARCHER, is an adult individual residing at 711 Hannah Street, Houtzdale, Clearfield County, Pennsylvania 16651.
3. On the dates, in the amounts, and for the prices set forth in a true and correct copy of the Plaintiff's Invoice hereto attached, marked Exhibit "A" and made a part hereof, Plaintiff performed labor and provided services of the kind and description set forth on said Exhibit to the total amount of One Thousand, Three Hundred Thirteen Dollars and Ninety-Three Cents (\$1,313.93).

4. The prices charged for said labor performed and services provided were just and reasonable, were the legal and market prices therefor and were the prices which the Defendant orally promised and agreed to pay to Plaintiff.

5. Due to Defendant's default in payment of said amount due and owing as aforesaid, service charges have been added to said account in the total amount of Four Hundred Three Dollars and Eighty-One Cents (\$403.81), as shown on Exhibit "B" attached hereto and made a part hereof.

6. Plaintiff did frequently demand payment from Defendant of said amount due and owing as aforesaid, but Defendant refused and neglected and still refuses and neglects to pay said amount or any part thereof.

WHEREFORE, Plaintiff brings this suit to recover from Defendant the sum of ONE THOUSAND, SEVEN HUNDRED SEVENTEEN DOLLARS AND SEVENTY-FOUR CENTS (\$1,717.74), together with interest thereon.

Respectfully submitted,

KNUPP, KODAK & IMBLUM, P.C.



Robert D. Kodak
407 North Front Street
Post Office Box #11848
Harrisburg, PA 17108-1848
(717) 238-7151
Attorney ID No. 18041
Attorney for Plaintiff

ENCLOSURE

WILLIAMS RESEARCH GROUP
NATIONAL LEGAL RESEARCH GROUP
INCORPORATED
A RESEARCH GROUP COMPANY



LEGAL RESEARCH, ANALYSIS, AND ADVOCACY FOR ATTORNEYS
800-727-6574 IN VIRGINIA: 804-817-6574

DUE AND PAYABLE UPON RECEIPT

Ronald E. Archer

711 Hannah Street
Houtzdale, PA 16651

PLEASE REMIT TO:

P.O. BOX 7187
CHARLOTTESVILLE, VIRGINIA 22908

PAGE 1

INVOICE # 4,281

10/18/01

(814) 378-7641

FAX 8143785559

OUR FILE: PA-FD/SOCIAL SECURITY/Black Lung/
Existence Of Pneumoconiosis
AFR-Nicholas A. Richtscheit

YOUR ACCOUNT # 35257.009

DUE AND PAYABLE

UPON RECEIPT

48 .39849.288

LEGAL RESEARCH SERVICES

\$1,296.00

10.80 HOURS

UPS CHARGES

\$17.93

INVOICE TOTAL \$1,313.93

PAYABLE IN

SERVICE CHARGES: A 1.5% MONTH
OR THE PERCENTAGE ALLOWED BY
BALANCES OVER 30 DAYS.

EXHIBIT

tabbed

A

(AN ANNUAL RATE OF 18%)
ASSESSED ON ALL UNPAID

STATEMENT

NATIONAL LEGAL RESEARCH GROUP
INCORPORATED
A RESEARCH GROUP COMPANY

LEGAL RESEARCH, ANALYSIS, AND ADVOCACY FOR ATTORNEYS
800-727-6574 IN VIRGINIA: 434-817-6574

DUE AND PAYABLE UPON RECEIPT

390 DAY STATEMENT

PLEASE REMIT TO:

P.O. BOX 7187

CHARLOTTESVILLE, VIRGINIA 22906

PAGE 1

INVOICE # 4,281

5/31/03

• Ronald E. Archer

711 Hannah Street
Houtzdale, PA 16651

(814) 378-7641

FAX (814) 378-5558

OUR FILE # 48.39849.288

YOUR ACCOUNT # SH 35257.009

DUE AND PAYABLE

RE: PA-FD/SOCIAL SECURITY/Black Lung/
Existence Of Pneumoconiosis
AFR--Nicholas A. Richtscheit

UPON RECEIPT

INVOICE	10/18/01	\$1,313.93
SERVICE CHARGE	12/31/01	\$19.71
SERVICE CHARGE	1/31/02	\$20.00
SERVICE CHARGE	2/28/02	\$20.30
SERVICE CHARGE	3/31/02	\$20.61
SERVICE CHARGE	4/30/02	\$20.92
SERVICE CHARGE	5/31/02	\$21.23
SERVICE CHARGE	6/30/02	\$21.55
SERVICE CHARGE	7/31/02	\$21.87
SERVICE CHARGE	8/31/02	\$22.20
SERVICE CHARGE	9/30/02	\$22.53
SERVICE CHARGE	10/31/02	\$22.87
SERVICE CHARGE	11/30/02	\$23.22
SERVICE CHARGE	12/31/02	\$23.56
SERVICE CHARGE	1/31/03	\$23.92
SERVICE CHARGE	2/28/03	\$24.28
SERVICE CHARGE	3/31/03	\$24.64
SERVICE CHARGE	4/30/03	\$25.01
SERVICE CHARGE	5/31/03	\$25.39

TOTAL \$1,717.74

PAYABLE

EXHIBIT

B

ANNUAL RATE OF 18%
BE ASSESSED ON ALL UNPAID

SERVICE CHARGES: A 1.5% MONTHLY
OR THE PERCENTAGE ALLOWED
BALANCES OVER 30 DAYS.

VERIFICATION

I, STEVEN E. PAULEY, DIRECTOR ACCOUNTS RECEIVABLE, OF NATIONAL LEGAL RESEARCH GROUP, INC. verify that the statements made in the foregoing document are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa. C. S. §4904, relating to unsworn falsification to authorities.

NATIONAL LEGAL RESEARCH GROUP, INC.

By: Steven E. Pauley
Title: Director, Accounts Receivable

Dated: August 14, 2003

29636

LAW OFFICES OF
KNUPP, KODAK & IMBLUM, P.C.
CAMERON MANSION
407 NORTH FRONT STREET
P.O. BOX 11848
HARRISBURG, PA 17108-1848

FILED
100-51145-3
AUG 21 2003 Atty PD 85.00

William A. Shaw
Prothonotary, Clerk of Courts

TO THE ABOVE NAMED DEFENDANT:
YOU ARE HEREBY NOTIFIED TO
PLEAD TO THE ENCLOSED COMPLAINT
WITHIN TWENTY (20) DAYS OF SERVICE
HEREOF OR A DEFALT JUDGMENT
WILL BE ENTERED AGAINST YOU.

KNUPP, KODAK & IMBLUM, P.C.

LAW OFFICES OF
KNUPP, KODAK & IMBLUM, P.C.
CAMERON MANSION
407 NORTH FRONT STREET
P.O. BOX 11848
HARRISBURG, PA 17108-1848

In The Court of Common Pleas of Clearfield County, Pennsylvania

NATIONAL LEGAL RESEARCH GROUP, INC.

VS.

ARCHER, RONALD E.

COMPLAINT

Sheriff Docket # 14455

03-1245-CD

SHERIFF RETURNS

NOW AUGUST 28, 2003 AT 2:00 PM SERVED THE WITHIN COMPLAINT ON RONALD E. ARCHER, DEFENDANT AT SHERIFF'S OFFICE, MARKET ST., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO RONALD E. ARCHER A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN TO HIM THE CONTENTS THEREOF.

SERVED BY: SNYDER

Return Costs

Cost	Description
32.33	SHERIFF HAWKINS PAID BY: ATTY CK# 58487
10.00	SURCHARGE PAID BY: ATTY CK# 58488

Sworn to Before Me This

24th Day Of Sept. 2003
William A. Shaw

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

So Answers,

Chester A. Hawkins
Chester A. Hawkins
Sheriff

FILED

SEP 24 2003

WAW

William A. Shaw
Prothonotary/Clerk of Courts

NATIONAL LEGAL RESEARCH GROUP, INC. : IN THE COURT OF COMMON PLEAS
Plaintiff : CLEARFIELD COUNTY, PENNSYLVANIA
v. :
RONALD E. ARCHER : NO. 2003-01245-CD
Defendant : CIVIL DIVISION - LAW

TO: PROTHONOTARY, COURT OF COMMON PLEAS
CLEARFIELD COUNTY, PENNSYLVANIA

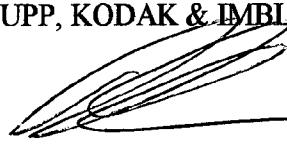
PRAECIPE FOR DEFAULT JUDGMENT

Enter judgment in favor of Plaintiff and against Defendant(s), RONALD E. ARCHER, named for failure to file within the required time an Answer to the Complaint in the above-captioned case and assess the Plaintiff's damages as follows:

Amount claimed in Plaintiff's Complaint less \$1,300.00 in payments	\$417.74
Interest from June 30, 2003 at the rate of 18% per annum	<u>\$173.89</u>
Total	\$591.63

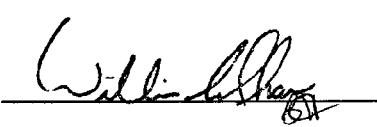
It is hereby certified that a written notice of intention to file this Praecipe was mailed to the Defendant(s) and his attorney of record, after the default occurred and at least ten (10) days prior to the date of the filing of this Praecipe. See Exhibits A & B attached.

KNUPP, KODAK & IMBLUM, P.C.


By _____

Robert D. Kodak, Attorney for Plaintiff

DATED: Judgment entered and damages assessed as above.


Prothonotary

FILED
m 13 08 01
OCT 31 2005
ICCA Notice
to def.
ICCA Stated.
to Atty
William A. Shaw Atty
Prothonotary/Clerk of Courts 20.00

(GP)

LAW OFFICES OF
KNUPP, KODAK & IMBLUM, P.C.

Robert L. Knupp
Robert D. Kodak
Gary J. Imblum

CAMERON MANSION
407 NORTH FRONT STREET
POST OFFICE BOX 11848
HARRISBURG, PA 17108-1848
Telephone: 717/238-7159
Facsimile: 717/238-7158
email: kki.law@verizon.net

FILE COPY

Robert Edwin Knupp
(1909-1976)
Robert H. Maurer
(1923-1998)

October 11, 2005

RONALD E ARCHER
711 HANNAH STREET
HOUTZDALE PA 16651

RE: National Legal Research Group, Inc.
VS: Ronald E. Archer
No. 2003-01245-CD, Court of Common Pleas
Clearfield County, Pennsylvania
Our File No. 29636

Dear Mr. Archer:

In accordance with Pennsylvania Rules of Civil Procedure 237.1(a)(2), we are enclosing herewith a Notice of a Praecept for Entry of Default Judgment. According to the records as they are found in the Office of the Prothonotary of Clearfield County, you have not filed responsive pleadings to the Complaint filed against you to the above term and number, nor has any attorney entered an appearance on your behalf.

Accordingly, we are forwarding to you the enclosed Notice which indicates that if you do not take action as set forth in this Notice, we, at the expiration of time indicated therein, will request the Office of the Prothonotary of Clearfield County to enter Judgment against you in the amount as set forth in said Complaint.

Very truly yours,

KNUPP, KODAK & IMBLUM, P.C.

Robert D. Kodak, Esq.

THIS LETTER IS AN ATTEMPT TO COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE

RDK/kqb

enclosure

cc: STEVEN E PAULEY DIR ACCTS REC
NATIONAL LEGAL RESEARCH GROUP INC
POST OFFICE BOX 7187
CHARLOTTESVILLE VA 22906



#35257.009

FILE COPY

NATIONAL LEGAL RESEARCH GROUP, INC.
Plaintiff

v.

RONALD E. ARCHER
Defendant

IN THE COURT OF COMMON PLEAS
CLEARFIELD COUNTY, PENNSYLVANIA
NO. 2003-01245-CD
CIVIL DIVISION - LAW

IMPORTANT NOTICE

TO: RONALD E. ARCHER, Defendant(s)

DATE OF NOTICE: OCTOBER 12, 2005

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN (10) DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING, AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

DAVID S. MEHOLICK, COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
1 NORTH SECOND STREET
CLEARFIELD PA 16830
814-765-2641, EXT. 32

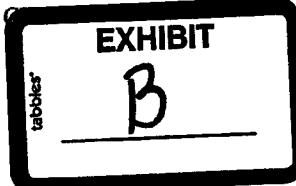
NOTICIA IMPORTANTE

A: RONALD E. ARCHER, Demandado(s)

FECHA DE NOTICIA: OCTOBER 12, 2005

USTED NO HA COMPLIDO CON EL AVISO ANTERIOR PORQUE HA FALTADO EN TOMAR MEDIDAS REQUERIDAS RESPECTO A ESTE CASO. SI USTED NO ACTUA DENTRO DE DIEZ (10) DIAS DESDE LA FECHA DE ESTA NOTICIA, ES POSIBLE QUE UN FALLO SEIA REGISTRADO CONTRA USTED SIN UNA AUDIENCIA Y USTED PODRIA PERDER SU PROPIEDAD O OTROS DERECHOS IMPORTANTES. USTED DEBE LLEVAR ESTA NOTICIA A SU ABOGADO EN SEGUIDA. SI USTED NO TIENE ABOGADO O NO TIENE CON QUE PAGAR LOS SERVICIOS DE UN ABOGADO, VAYA O LLAME A LA OFICINA ESCRITA ABAJO PARA AVERIGUAR A DONDE USTED PUEDE OBTENER LA AYUDA LEGAL:

DAVID S. MEHOLICK, COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
1 NORTH SECOND STREET





COPY

NATIONAL LEGAL RESEARCH GROUP, INC.
Plaintiff

v.

RONALD E. ARCHER
Defendant

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

: NO. 2003-01245-CD

: CIVIL DIVISION - LAW

To: RONALD E. ARCHER, DEFENDANT(S)

You are hereby notified that on October 31, 2005, the following (Judgment) has been entered against you in the above-captioned case.

Judgment entered in the amount of \$591.63.

DATE: 10/31/05

L. J. Archer
Prothonotary

I hereby certify that the name and address of the proper person(s) to receive this notice is:

RONALD E ARCHER
711 HANNAH STREET
HOUTZDALE PA 16651

A/ RONALD E. ARCHER, Defendido/a, Defendidos/as

Por este medio se le esta notificando que el _____ de _____ del 20____, el/la siguiente(Fallo) ha sido anotado en contra suya en el caso mencionado en el epigrafe.

FECHA: _____

Protonotario

Certifico que la siguiente direccion es la del defendido/asegurado indicada en el certificado de residencia:

RONALD E ARCHER
711 HANNAH STREET
HOUTZDALE PA 16651

Abogado del Demandante

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

 COPY

National Legal Research Group, Inc.
Plaintiff(s)

No.: 2003-01245-CD

Real Debt: \$591.63

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Ronald E. Archer
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: October 31, 2005

Expires: October 31, 2010

Certified from the record this 31st day of October, 2005.

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

NATIONAL LEGAL RESEARCH
GROUP, INC.

Plaintiff

v

RONALD E. ARCHER

Defendant(s)

IN THE COURT OF COMMON PLEAS
Clearfield COUNTY, PENNSYLVANIA

NO. 2003-01245-CD

CIVIL ACTION - LAW

PRAECIPE

TO THE PROTHONOTARY:

Please mark the above-captioned Judgment as settled and satisfied in full.

TO: Clearfield County
Prothonotary

Dated: March 9, 2009



Robert D. Kodak, Esquire
Attorney for Plaintiff
Attorney I.D. No. 18041

S **FILED** pd \$7.00 Atty
MAY 10 2009 1CC + 1 Cert of
MAR 11 2009 Sat issued to
William A. Shaw Atty Kodak
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

CC
L

CERTIFICATE OF SATISFACTION OF JUDGMENT

No.: 2003-01245-CD

National Legal Research Group, Inc.

Debt: \$591.63

Vs.

Atty's Comm.:

Ronald E. Archer

Interest From:

Cost: \$7.00

NOW, Wednesday, March 11, 2009 , directions for satisfaction having been received, and all costs having been paid, SATISFACTION was entered of record.

Certified from the record this 11th day of March, A.D. 2009.



Prothonotary