

2004-586-CD  
MURRAY FORD, TNC.

VS

NANCY L. BERQUIST

Murray's Ford Inc. vs Nancy Berquist  
2004-586-CD

Date: 04/27/2004

**Clearfield County Court of Common Pleas**  
**Receipt**

NO. 1877939

Time: 08:50 AM

Page 1 of 1

Received of: Berquist, Nancy L. (defendant)

\$ 0.00

Zero and 00/100 Dollars

Case: 2004-00586-CD	Defendant: Berquist, Nancy L.	Amount
IFP Petition		0.00
<b>Total:</b>		<b>0.00</b>

Payment Method: Cash

William A. Shaw, Prothonotary/Clerk of Courts

Clerk: BILLSHAW

By: \_\_\_\_\_  
Deputy Clerk

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

Murray Ford, Inc., :  
Plaintiff : NO. 04-586-C  
vs. : Type of Case: Civil  
: Type of Pleading:  
Nancy L. Berquist, : IFP Petition  
Defendant : Filed on Behalf of: Nancy L. Berquist  
: Counsel of Record:  
: Robin Jean Foor, Esquire  
: Supreme Court No. 41520  
: MidPenn Legal Services  
: 211 1/2 East Locust Street  
: Clearfield, PA 16830  
: (814)765-9646

FILED

APR 26 2004

William A. Shaw  
Prothonotary/Clerk of Courts

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

Murray Ford, Inc., : No.  
Plaintiff :  
: :  
v. : :  
: :  
Nancy L. Berquist, : :  
Defendant : :

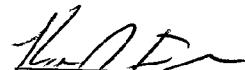
PRAECIPE TO PROCEED IN FORMA PAUPERIS

TO THE PROTHONOTARY:

Kindly allow defendant, Nancy L. Berquist, to proceed in forma pauperis and waive the filing fees.

I, Robin Jean Foor, attorney for the party proceeding in forma pauperis, certify that I believe the party is unable to pay the costs and that I am providing free legal service to the party. The party's affidavit showing inability to pay the costs of litigation is attached hereto.

MIDPENN LEGAL SERVICES,

By:   
Robin Jean Foor  
Attorney for Nancy L. Berquist  
211 1/2 East Locust Street  
Clearfield, PA 16830  
(814) 765-9646

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

Murray Ford, Inc.,	: NO.
Plaintiff	:
	:
	:
v.	:
	:
	:
Nancy L. Berquist,	:
Defendant	:

PETITION TO PROCEED IN FORMA PAUPERIS

TO THE HONORABLE, THE JUDGES OF THE SAID COURT:

The Petition of Nancy L. Berquist respectfully represents:

1. I am the defendant in the above matter and because of my financial condition am unable to pay the fees and costs of prosecuting or defending the action or proceeding.
2. I am unable to obtain funds from anyone, including my family and associates, to pay the costs of litigation.
3. I represent that the information below relating to my ability to pay the fees and costs is true and correct:

(a) Name: Nancy L. Berquist

Address: 1117 A South Main Street, Dubois, PA

Soc. Sec. No.: 168-56-7848

--If you are presently employed, state

Employer: Falls Creek Eagles

Address: Jefferson Street, Falls Creek

Salary or wages per month: 1204 gross

Type of work: Cook

--If you are presently unemployed, state

Date of last employment:

Salary or wages per month:

Type of work:

(c) Other income within the past twelve months

Business or profession: None

Other self-employment: None

Interest: None

Dividends: None

Pension and annuities: None

Social security benefits: None

Support payments: 400 child support

Disability payments: None

Unemployment compensation and supplemental benefits: None

Workman's compensation: None

Public assistance: None

Other:

(d) Other contributions to household support(please circle)

Name of Spouse, Boyfriend/girlfriend, or Roommate/housemate:

If employed, state

Employer:

Salary or wages per month:

Type of work:

Contributions from children: None

Contributions from parents, family members or

any other individuals: None

**(e) Property owned**

Cash: 10

Checking account: None

Savings account: \$130

Certificates of deposit: None

Real estate (including home): None

Motor vehicle: Model, Make/Year: 1996 Pontiac Grand AM

Cost: 1700 ; Amount owed: 0

Stocks; bonds: None

Other: None

**(f) Debts and obligations**

Utilities: \$ 100 Electric

\$ 80 gas

\$ 30 telephone

\$

Groceries \$ 200

Rent/Mortgage \$375

Loans:

Auto expense: \$65

Child support: \$130

Miscellaneous: Furniture payment 340

**(g) Persons dependent upon you for support**

Spouse's Name: N/A

Children, if any (names/ages): Cory, 8; Rachel, 17

Other persons: Name: None

Relationship: N/A

4. I understand that I have a continuing obligation to inform the court of improvement in my financial circumstances which would permit me to pay the costs incurred herein.

5. I verify that the statements made in this affidavit 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.

Date: 4/26/04

Nancy L. Berquist  
Nancy L. Berquist

FILED  
01 3:00 PM  
APR 26 2004  
cc: *Any Person*  
*Par*

William A. Shaw  
Prothonotary/Clerk of Courts

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

Murray Ford, Inc.,  
Plaintiff

: No. 04-586-CD

v.

Nancy L. Berquist,  
Defendant

:

ORDER

AND NOW, this 28 day of April, 2004 upon consideration  
of the foregoing Affidavit in support of Petition to Proceed In Forma Pauperis, it is the ORDER  
of this Court that said Petition is GRANTED/~~REDENDED~~.

If the Petition is GRANTED, Filing fee is hereby WAIVED.

By the Court

Judge

FILED

APR 28 2004

William A. Shaw  
Prothonotary/Clerk of Courts

FILED

2004  
APR 28 2004

1cc  
Attn: *John F. Foy*  
William A. Shaw  
Prothonotary/Clerk of Courts

*JK*

46<sup>th</sup>

## NOTICE OF APPEAL

FROM

## DISTRICT JUSTICE JUDGMENT

COMMON PLEAS NO.

04-586-CJ

## NOTICE OF APPEAL

Notice is given that the appellant has filed in the above Court of Common Pleas an appeal from the judgment rendered by the District Justice on the date and in the case mentioned below.

NAME OF APPELLANT		MAG. DIST. NO. OR NAME OF D.J.		
Nancy L. Berquist		46-3-01		
ADDRESS OF APPELLANT		CITY	STATE	ZIP CODE
1117A South Main Street		DuBois	PA	15801
DATE OF JUDGMENT	IN THE CASE OF (Plaintiff)		(Defendant)	
3-31-04	Murray's Ford Inc.		vs. Nancy L. Berquist	
CLAIM NO.	SIGNATURE OF APPELLANT OR HIS ATTORNEY OR AGENT			
CV 0000078-04	<i>Rob J. Foor</i>			
LT				

This block will be signed ONLY when this notation is required under Pa. R.C.P.J.P. No. 1008B.

This Notice of Appeal, when received by the District Justice, will operate as a SUPERSEDEAS to the judgment for possession in this case.

\_\_\_\_\_  
Signature of Prothonotary or Deputy

If appellant was CLAIMANT (see Pa. R.C.P.J.P. No. 1001(6) in action before District Justice, he MUST FILE A COMPLAINT within twenty (20) days after filing his NOTICE of APPEAL.

## PRAECIPE TO ENTER RULE TO FILE COMPLAINT AND RULE TO FILE

(This section of form to be used ONLY when appellant was DEFENDANT (see Pa. R.C.P.J.P. No. 1001(7) in action before District Justice. IF NOT USED, detach from copy of notice of appeal to be served upon appellee).

## PRAECIPE: To Prothonotary

Enter rule upon Murray's Ford Inc., appellee(s), to file a complaint in this appeal  
(Name of appellee(s))

(Common Pleas No. 04-586-CJ) within twenty (20) days after service of rule or suffer entry of judgment of non pros.

*Rob J. Foor*  
Signature of appellant or his attorney or agent

**RULE:** To Murray's Ford Inc., appellee(s).  
(Name of appellee(s))

(1) You are notified that a rule is hereby entered upon you to file a complaint in this appeal within twenty (20) days after the date of service of this rule upon you by personal service or by certified or registered mail.

(2) If you do not file a complaint within this time, a JUDGMENT OF NON PROS WILL BE ENTERED AGAINST YOU.

(3) The date of service of this rule if service was by mail is the date of mailing.

Date: April 28, 2004.

*William A. Shaw*  
Signature of Prothonotary or Deputy

**FILED**  
01/23/04  
APR 28 2004  
William A. Shaw  
Prothonotary/Clerk of Courts  
Copies to  
Atty Foor  
E  
KZ

---

## PROOF OF SERVICE OF NOTICE OF APPEAL AND RULE TO FILE COMPLAINT

*(This proof of service MUST BE FILED WITHIN TEN (10) DAYS AFTER filing the notice of appeal. Check applicable boxes)*

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF \_\_\_\_\_; SS

**AFFIDAVIT:** I hereby swear or affirm that I served

a copy of the Notice of Appeal, Common Pleas No. \_\_\_\_\_, upon the District Justice designated therein on  
*(date of service)* \_\_\_\_\_,  by personal service  by (certified) (registered) mail, sender's  
receipt attached hereto, and upon the appellee, (name) \_\_\_\_\_, on \_\_\_\_\_,  
 by personal service  by (certified) (registered) mail, sender's receipt attached hereto.  
 and further that I served the Rule to File a Complaint accompanying the above Notice of Appeal upon the appellee(s) to whom  
the Rule was addressed on \_\_\_\_\_, \_\_\_\_\_,  by personal service  by (certified) (registered)  
mail, sender's receipt attached hereto.

SWORN (AFFIRMED) AND SUBSCRIBED BEFORE ME

THIS \_\_\_\_\_ DAY OF \_\_\_\_\_,

*Signature of affiant*

*Signature of official before whom affidavit was made*

*Title of official*

My commission expires on \_\_\_\_\_,

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: **CLEARFIELD**

Mag. Dist. No.:

**46-3-01**

DJ Name: Hon.

**PATRICK N. FORD**  
Address: **309 MAPLE AVENUE**  
**P.O. BOX 452**  
**DUBOIS, PA**  
Telephone: **(814) 371-5321**

**15801**

**ATTORNEY DEF PRIVATE :**

**ROBIN J. FOOR**  
**211 1/2 E LOCUST ST**  
**MID-PENN LEGAL SERVICE**  
**CLEARFIELD, PA 16830**

**NOTICE OF JUDGMENT/TRANSCRIPT  
CIVIL CASE**

PLAINTIFF:

**MURRAY'S FORD, INC.**  
**RR 1 BOX 12**  
**DUBOIS, PA 15801**

NAME and ADDRESS

DEFENDANT:

**BERQUIST, NANCY L**  
**1117-A SOUTH MAIN STREET**  
**DUBOIS, PA 15801**

NAME and ADDRESS

Docket No.: **CV-0000078-04**  
Date Filed: **2/17/04**



**THIS IS TO NOTIFY YOU THAT:**

Judgment:

**FOR PLAINTIFF**

Judgment was entered for: (Name) **MURRAY'S FORD, INC.**

Judgment was entered against: (Name) **BERQUIST, NANCY L**

in the amount of \$ **2,389.55** on: (Date of Judgment) **3/31/04**

Defendants are jointly and severally liable. (Date & Time) \_\_\_\_\_

Damages will be assessed on: \_\_\_\_\_

This case dismissed without prejudice. \_\_\_\_\_

Amount of Judgment Subject to Attachment/42 Pa.C.S. § 8127 \$ \_\_\_\_\_

Portion of Judgment for physical damages arising out of residential lease \$ \_\_\_\_\_

Amount of Judgment	\$ <b>2,303.55</b>
Judgment Costs	\$ <b>86.00</b>
Interest on Judgment	\$ <b>.00</b>
Attorney Fees	\$ <b>.00</b>
<b>Total</b>	<b>\$ 2,389.55</b>
Post Judgment Credits	\$ _____
Post Judgment Costs	\$ _____
=====	
<b>Certified Judgment Total</b>	<b>\$ _____</b>

ANY PARTY HAS THE RIGHT TO APPEAL WITHIN 30 DAYS AFTER THE ENTRY OF JUDGMENT BY FILING A NOTICE OF APPEAL WITH THE PROTHONOTARY/CLERK OF THE COURT OF COMMON PLEAS, CIVIL DIVISION. YOU MUST INCLUDE A COPY OF THIS NOTICE OF JUDGMENT/TRANSCRIPT FORM WITH YOUR NOTICE OF APPEAL.

EXCEPT AS OTHERWISE PROVIDED IN THE RULES OF CIVIL PROCEDURE FOR DISTRICT JUSTICES, IF THE JUDGMENT HOLDER ELECTS TO ENTER THE JUDGMENT IN THE COURT OF COMMON PLEAS, ALL FURTHER PROCESS MUST COME FROM THE COURT OF COMMON PLEAS AND NO FURTHER PROCESS MAY BE ISSUED BY THE DISTRICT JUSTICE.

UNLESS THE JUDGMENT IS ENTERED IN THE COURT OF COMMON PLEAS, ANYONE INTERESTED IN THE JUDGMENT MAY FILE A REQUEST FOR ENTRY OF SATISFACTION WITH THE DISTRICT JUSTICE IF THE JUDGMENT DEBTOR PAYS IN FULL, SETTLES, OR OTHERWISE COMPLIES WITH THE JUDGMENT.

3-31-04 Date Patrick N. Ford - PNF, District Justice

I certify that this is a true and correct copy of the record of the proceedings containing the judgment.

Date \_\_\_\_\_, District Justice

My commission expires first Monday of January, **2006** .

SEAL



46<sup>th</sup>

## NOTICE OF APPEAL

FROM

## DISTRICT JUSTICE JUDGMENT

COMMON PLEAS No.

04-586-C

## NOTICE OF APPEAL

Notice is given that the appellant has filed in the above Court of Common Pleas an appeal from the judgment rendered by the District Justice on the date and in the case mentioned below.

NAME OF APPELLANT <b>Nancy L. Berquist</b>		MAG. DIST. NO. OR NAME OF D.J. <b>46-3-01</b>		
ADDRESS OF APPELLANT <b>1117A South Main Street</b>		CITY <b>DuBois</b>	STATE <b>PA</b>	ZIP CODE <b>15801</b>
DATE OF JUDGMENT <b>3-31-04</b>	IN THE CASE OF (Plaintiff) <b>Murray's Ford Inc.</b>	vs. (Defendant) <b>Nancy L. Berquist</b>		
CLAIM NO. CV <b>0000078-04</b> LT		SIGNATURE OF APPELLANT OR HIS ATTORNEY OR AGENT <i>Rohr/Joan</i>		
<p>This block will be signed ONLY when this notation is required under Pa. R.C.P.J.P. No. 1008B.</p> <p>This Notice of Appeal, when received by the District Justice, will operate as a SUPERSEDEAS to the judgment for possession in this case.</p> <p><i>Signature of Prothonotary or Deputy</i></p> <p>If appellant was CLAIMANT (see Pa. R.C.P.J.P. No. 1001(6) in action before District Justice, he MUST FILE A COMPLAINT within twenty (20) days after filing his NOTICE of APPEAL.</p>				

## PRAECIPE TO ENTER RULE TO FILE COMPLAINT AND RULE TO FILE

(This section of form to be used ONLY when appellant was DEFENDANT (see Pa. R.C.P.J.P. No. 1001(7) in action before District Justice. IF NOT USED, detach from copy of notice of appeal to be served upon appellee).

## PRAECIPE: To Prothonotary

Enter rule upon Murray's Ford Inc., appellee(s), to file a complaint in this appeal  
(Name of appellee(s))  
(Common Pleas No. 04-586-C) within twenty (20) days after service of rule or suffer entry of judgment of non pros.

*Rohr/Joan*  
Signature of appellant or his attorney or agent

**RULE:** To Murray's Ford Inc.  
(Name of appellee(s))

~~appellee(s)~~

(1) You are notified that a rule is hereby entered upon you to file a complaint in this appeal within twenty (20) days after the date of service of this rule upon you by personal service or by certified or registered mail.

(2) If you do not file a complaint within this time, a JUDGMENT OF NON PROS WILL BE ENTERED AGAINST YOU.

(3) The date of service of this rule if service was by mail is the date of mailing.

Date: April 28, 2004

*Willie Rohr*  
Signature of Prothonotary or Deputy

## PROOF OF SERVICE OF NOTICE OF APPEAL AND RULE TO FILE COMPLAINT

(This proof of service MUST BE FILED WITHIN TEN (10) DAYS AFTER filing the notice of appeal. Check applicable boxes)

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF Clearfield ; ss

**AFFIDAVIT:** I hereby swear or affirm that I served

a copy of the Notice of Appeal, Common Pleas No. 04-586-CJ, upon the District Justice designated therein on  
 (date of service) April 30, 2004  by personal service  by (certified) (registered) mail, sender's receipt attached hereto, and upon the appellee, (name) Murray Ford Inc, on  
April 30, 2004  by personal service  by (certified) (registered) mail, sender's receipt attached hereto.  
 and further that I served the Rule to File a Complaint accompanying the above Notice of Appeal upon the appellee(s), to whom  
 the Rule was addressed on April 30, 2004,  by personal service  by (certified) (registered) mail, sender's receipt attached hereto.

SWORN (AFFIRMED) AND SUBSCRIBED BEFORE ME

THIS 30<sup>th</sup> DAY OF April, 2004

Signature of affiant

Title of official

My commission expires on

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

<b>U.S. Postal Service CERTIFIED MAIL<sup>TM</sup> RECEIPT</b>	
(Domestic Mail Only; No Insurance Coverage Provided)	
For delivery information visit our website at <a href="http://www.usps.com">www.usps.com</a>	
<b>OFFICIAL USE</b>	
Postage	\$ <u>3.70</u>
Certified Fee	\$ <u>0.00</u>
Return Receipt Fee (Endorsement Required)	\$ <u>0.00</u>
Restricted Delivery Fee (Endorsement Required)	\$ <u>0.00</u>
Total Postage & Fees	\$ <u>4.70</u>

**Sent To:** Patrick N. Ford, District Magistrate  
Street: Apt. No. 309, Maple Avenue, P.O. Box 45  
City, State, Zip: Clearfield, Pennsylvania 15831

PS Form 3800 (June 2002)

<b>U.S. Postal Service CERTIFIED MAIL<sup>TM</sup> RECEIPT</b>	
(Domestic Mail Only; No Insurance Coverage Provided)	
For delivery information visit our website at <a href="http://www.usps.com">www.usps.com</a>	
<b>OFFICIAL USE</b>	
Postage	\$ <u>3.70</u>
Certified Fee	\$ <u>0.00</u>
Return Receipt Fee (Endorsement Required)	\$ <u>0.00</u>
Restricted Delivery Fee (Endorsement Required)	\$ <u>0.00</u>
Total Postage & Fees	\$ <u>4.70</u>

**Sent To:** Murray's Ford, Inc.  
Street: Apt. No. 1, Box 12  
or PO Box No. R #1, Box 12  
City, State, Zip: Clearfield, PA 15831

PS Form 3800 (June 2002)

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: **CLEARFIELD**

Mag. Dist. No.:

**46-3-01**

DJ Name: Hon.

**PATRICK N. FORD**  
Address: **309 MAPLE AVENUE**  
**P.O. BOX 452**  
**DUBOIS, PA**  
Telephone: **(814) 371-5321**

**15801**

**PATRICK N. FORD**  
**309 MAPLE AVENUE**  
**P.O. BOX 452**  
**DUBOIS, PA 15801**

**NOTICE OF JUDGMENT/TRANSCRIPT  
CIVIL CASE**

PLAINTIFF:

**MURRAY'S FORD, INC.**  
**RR 1 BOX 12**  
**DUBOIS, PA 15801**

NAME and ADDRESS

DEFENDANT:

**BERQUIST, NANCY L**  
**1117-A SOUTH MAIN STREET**  
**DUBOIS, PA 15801**

NAME and ADDRESS

Docket No.: **CV-0000078-04**  
Date Filed: **2/17/04**



*2004-586-C0*

**THIS IS TO NOTIFY YOU THAT:**

Judgment:

**FOR PLAINTIFF**

Judgment was entered for: (Name) **MURRAY'S FORD, INC.**

Judgment was entered against: (Name) **BERQUIST, NANCY L**

in the amount of \$ **2,389.55** on: (Date of Judgment) **3/31/04**

Defendants are jointly and severally liable.

(Date & Time) \_\_\_\_\_

Damages will be assessed on:

This case dismissed without prejudice.

**FILED**

*MAY 07 2004*

*m/ 2:30/04*  
**William A. Shaw**  
**Prothonotary**

Amount of Judgment	\$ <b>2,303.55</b>
Judgment Costs	\$ <b>86.00</b>
Interest on Judgment	\$ <b>.00</b>
Attorney Fees	\$ <b>.00</b>
<b>Total</b>	<b>\$ 2,389.55</b>
Post Judgment Credits	\$ _____
Post Judgment Costs	\$ _____
<b>Certified Judgment Total</b> \$ _____	

ANY PARTY HAS THE RIGHT TO APPEAL WITHIN 30 DAYS AFTER THE ENTRY OF JUDGMENT BY FILING A NOTICE OF APPEAL WITH THE PROTHONOTARY/CLERK OF THE COURT OF COMMON PLEAS, CIVIL DIVISION. YOU MUST INCLUDE A COPY OF THIS NOTICE OF JUDGMENT/TRANSCRIPT FORM WITH YOUR NOTICE OF APPEAL.

EXCEPT AS OTHERWISE PROVIDED IN THE RULES OF CIVIL PROCEDURE FOR DISTRICT JUSTICES, IF THE JUDGMENT HOLDER ELECTS TO ENTER THE JUDGMENT IN THE COURT OF COMMON PLEAS, ALL FURTHER PROCESS MUST COME FROM THE COURT OF COMMON PLEAS AND NO FURTHER PROCESS MAY BE ISSUED BY THE DISTRICT JUSTICE.

UNLESS THE JUDGMENT IS ENTERED IN THE COURT OF COMMON PLEAS, ANYONE INTERESTED IN THE JUDGMENT MAY FILE A REQUEST FOR ENTRY OF SATISFACTION WITH THE DISTRICT JUSTICE IF THE JUDGMENT DEBTOR PAYS IN FULL, SETTLES, OR OTHERWISE COMPLIES WITH THE JUDGMENT.

*331-04* Date *Patrick N. Ford - PNF*, District Justice

I certify that this is a true and correct copy of the record of the proceedings containing the judgment.

Date \_\_\_\_\_, District Justice

My commission expires first Monday of January, **2006**.

SEAL

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: CLEARFIELD

Mag. Dist. No.:

46-3-01

DJ Name: Hon.

**PATRICK N. FORD**

Address: 309 MAPLE AVENUE  
P.O. BOX 452  
DUBOIS, PA  
Telephone: (814) 371-5321

15801

**CIVIL COMPLAINT**

PLAINTIFF:

NAME and ADDRESS

Murray's Ford, Inc.  
RR1 Box 12  
DuBois, PA 15801

VS.

DEFENDANT:

NAME and ADDRESS

Nancy L Berquist  
1117-A South Main Street  
DuBois, PA 15801

Docket No.: CV-18-04  
Date Filed: 2-17-04



	AMOUNT	DATE PAID
FILING COSTS	<u>\$ 86.00</u>	<u>2/17/04</u>
SERVING COSTS	<u>\$ _____</u>	<u>/ /</u>
TOTAL	<u>\$ _____</u>	<u>/ /</u>

TO THE DEFENDANT: The above named plaintiff(s) asks judgment against you for \$ 2,303.55 together with costs upon the following claim (Civil fines must include citation of the statute or ordinance violated):

Repossession of 1994 Ford Taurus VIN# 1FALP52U7RA280499

resulting from non-payment of Auto Loan with Murray's Ford

Buy Here Pay Here Department.

I, Kate E. Reeser verify that the facts set forth in this complaint are true and correct to the best of my knowledge, information, and belief. This statement is made subject to the penalties of Section 4904 of the Crimes Code (18 PA. C.S. § 4904) related to unsworn falsification to authorities.

Kate E. Reeser  
(Signature of Plaintiff or Authorized Agent)

Plaintiff's Attorney: \_\_\_\_\_ Address: \_\_\_\_\_

Telephone: \_\_\_\_\_

IF YOU INTEND TO ENTER A DEFENSE TO THIS COMPLAINT, YOU SHOULD SO NOTIFY THIS OFFICE IMMEDIATELY AT THE ABOVE TELEPHONE NUMBER. YOU MUST APPEAR AT THE HEARING AND PRESENT YOUR DEFENSE. UNLESS YOU DO, JUDGMENT WILL BE ENTERED AGAINST YOU BY DEFAULT.

If you have a claim against the plaintiff which is within district justice jurisdiction and which you intend to assert at the hearing, you must file it on a complaint form at this office at least five (5) days before the date set for the hearing. If you have a claim against the plaintiff which is not within district justice jurisdiction, you may request information from this office as to the procedures you may follow. If you are disabled and require assistance, please contact the Magisterial District office at the address above.

FILED

MAY 07 2004

William A. Shaw  
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

Civil Division

MURRAY'S FORD, INC.,  
Plaintiff

VS.

NANCY L. BERQUIST,  
Defendant

\*  
\* No. 04-586-CD  
\*  
\* TYPE OF CASE: Civil  
\*  
\*  
\* TYPE OF PLEADING: Certificate of Service  
\*  
\*  
\* FILED ON BEHALF OF: Nancy L. Berquist  
\*  
\* COUNSEL OF RECORD FOR THIS PARTY:  
\* Robin Jean Foor, Esquire  
\*  
\* SUPREME COURT NO.: 41520  
\*  
\* MidPenn Legal Services  
\* 211 ½ East Locust Street  
\* Clearfield, Pennsylvania 16830  
\* (814) 765-9646  
\*  
\*

FILED

MAY 10 2004  
2/1/04  
William A. Shaw  
Prothonotary/Clerk of Courts  
I Went to Attn:

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

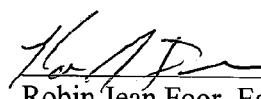
MURRAY'S FORD, INC., \*  
Plaintiff \*  
vs. \* No. 04-586-CD  
\*  
\*  
NANCY L. BERQUIST, \*  
Defendant \*  
\*

CERTIFICATE OF SERVICE

I, Robin Jean Foor, Esquire, hereby certify that on the 3<sup>rd</sup> day of May, 2004, I served a copy of the Notice of Appeal and Praeclipe to Enter Rule to File Complaint and Rule to File filed to the above-captioned case to the following individual by certified mail, return receipt requested:

Patrick N. Ford, District Magistrate  
309 Maple Avenue  
P.O. Box 452  
DuBois, PA 15801

The return receipt card signed by Patrick N. Ford is attached.

  
\_\_\_\_\_  
Robin Jean Foor, Esquire

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

**1. Article Addressed to:**

Patrick N Ford, District Justice  
309 Maple Avenue  
P.O. Box 452  
DuBois, Pennsylvania  
15801

**COMPLETE THIS SECTION ON DELIVERY****A. Signature**

Patrick N. Ford  Agent  
 Addressee

**B. Received by (Printed Name)**

PATRICK N. FORD 5-3-04

**C. Date of Delivery**

D. Is delivery address different from item 1?  Yes  
If YES, enter delivery address below:  No

**3. Service Type**

Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

**4. Restricted Delivery? (Extra Fee)**

Yes

7003 1680 0005 6732 0026

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1540

FILED

MAY 10 2004

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

Civil Division

MURRAY'S FORD, INC.,  
Plaintiff

vs.

NANCY L. BERQUIST,  
Defendant

\*  
\* No. 04-586-CD  
\*  
\* TYPE OF CASE: Civil  
\*  
\*  
\* TYPE OF PLEADING: Certificate of Service  
\*  
\*  
\* FILED ON BEHALF OF: Nancy L. Berquist  
\*  
\* COUNSEL OF RECORD FOR THIS PARTY:  
\* Robin Jean Foor, Esquire  
\*  
\* SUPREME COURT NO.: 41520  
\*  
\* MidPenn Legal Services  
\* 211 ½ East Locust Street  
\* Clearfield, Pennsylvania 16830  
\* (814) 765-9646  
\*  
\*

FILED

MAY 10 2004  
William A. Shaw  
Prothonotary/Clerk of Courts  
1 copy to Atty

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

MURRAY'S FORD, INC.,  
Plaintiff

\*

\*

\*

vs.

\* No. 04-586-CD

\*

\*

\*

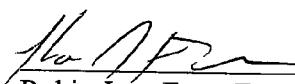
NANCY L. BERRQUIST,  
Defendant

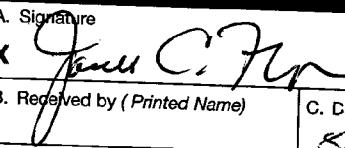
CERTIFICATE OF SERVICE

I, Robin Jean Foor, Esquire, hereby certify that on the 3<sup>rd</sup> day of May, 2004, I served a copy of the Notice of Appeal and Praecipe to Enter Rule to File Complaint and Rule to File filed to the above-captioned case to the following individual by certified mail, return receipt requested:

Murray's Ford, Inc.  
RR #1, Box 12  
DuBois, PA 15801

The return receipt card signed by a representative of Murray's Ford, Inc. is attached.

  
\_\_\_\_\_  
Robin Jean Foor, Esquire

<b>SENDER: COMPLETE THIS SECTION</b>		<b>COMPLETE THIS SECTION ON DELIVERY</b>	
<ul style="list-style-type: none"> <li>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>■ Print your name and address on the reverse so that we can return the card to you.</li> <li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>		<p>A. Signature </p> <p><input checked="" type="checkbox"/> Agent      <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <input type="text" value="Janell C. Flanagan"/></p> <p>C. Date of Delivery <input type="text" value="5/31/04"/></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>1. Article Addressed to:</p> <p>Murray's Ford, Inc. RR #1, Box 12 DuBois, PA 15801</p> <p>3. Service Type  <input checked="" type="checkbox"/> Certified Mail      <input type="checkbox"/> Express Mail  <input type="checkbox"/> Registered      <input checked="" type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Insured Mail      <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input checked="" type="checkbox"/> Yes</p> <p>2. Article Number <input type="text" value="7003 1680 0005 6732 0033"/></p>	
<p>PS Form 3811, August 2001      Domestic Return Receipt      1C2595-02-M-1540</p>			

FILED

MAY 10 2004

William A. Shaw  
Prothonotary/Clerk of Courts

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

**MURRAY'S FORD, INC.**

Plaintiff

District Justice Appeal  
CASE NO. 04-586-C.D.

VS

Type of Pleading:  
**COMPLAINT**

**NANCY L. BERQUIST**

Defendant

Filed on Behalf of  
**PLAINTIFF**

Plaintiff's Address:  
RD 1 Box 12  
DuBois, PA 15801  
(814) 371-6600

**FILED**

**MAY 20 2004**

William A. Shaw  
Prothonotary/Clerk of Courts

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

<u>Murray's Ford, Inc.</u>	:	
Plaintiff	:	
	:	District Justice Appeal
	:	CASE NO. 04-586-C.D.
VS	:	
	:	Type of Pleading:
	:	<b>COMPLAINT</b>
<u>Nancy L. Berquist</u>	:	
Defendant	:	
	:	

NOW, comes the Plaintiff, **Murray's Ford, Inc.**, who hereby avers as follows:

1. The Plaintiff is a duly incorporated corporate doing business as Murray's Ford, Inc., RD 1, Box 12, DuBois, Pa 15801.
2. The Defendant is Nancy L. Berquist, an adult individual whose address is 1117-A South Main Street, DuBois, Pa 15801.
3. On November 30, 2002, Nancy L. Berquist did purchase from the Plaintiff a 1994 Ford Taurus, Vehicle Identification Number 1FALP52U7RA280499 for the financed total of \$4,148.56 through the Murray's Ford Buy Here Pay Here Department.

4. On November 30, 2003, the Defendant, Nancy L. Berquist, took possession of the 1994 Ford Taurus and was given all of the financial documents that were associated with the purchase of said vehicle.

5. The Defendant, Nancy L. Berquist, did default on the payments on the loan.

6. At the time of repossession, the Defendant, Nancy L. Berquist was 17 payments in arrears with the Murray's Ford Buy Here Pay Here Department.

7. On October 26, 2003, the Defendant, Nancy L. Berquist, presented a personal check numbered 1209 in the amount of \$100.00 to Murray's Ford, Inc.

8. First Commonwealth Bank returned the check to Murray's Ford, Inc. marked Non-Sufficient Funds.

9. Murray's Ford then proceeded with correspondence via Regular Mail and Certified Mail to the Defendant, Nancy L. Berquist at 1117-A South Main Street, DuBois, Pa 15801.

10. The above mentioned Certified letter came back marked Unclaimed. The letter mailed first class mail was not returned.

11. On November 20, 2003, Mr. Danny Shenkle, Manager of the Buy Here Pay Here Department did repossess the 1994 Ford Taurus from the Defendant, Nancy L. Berquist at her place of employment.

12. At this time the Defendant, Nancy L. Berquist, gave to Mr. Shenkle her new address and removed some personal items from the 1994 Ford Taurus.

13. The above said vehicle was held in storage at Murray's Ford, Inc., RD 1 Box 12, DuBois, Pa 15801.

14. On November 21, 2003, Mr. Shenkle sent via Regular Mail and Certified Mail the Itemization Letter and the List of Personal Property that was being held for the Defendant, Nancy L. Berquist to reclaim.

15. The letter that was sent by Certified Mail came back unclaimed. The letter that was sent first class mail was not returned to Murray's Ford.

16. The Itemization letter stated that we would be holding the 1994 Ford Taurus until December 5, 2003 giving the Defendant, Nancy L. Berquist time to pay the past due amount and reclaim the said vehicle.

17. Murray's Ford Inc. did file a Criminal Complaint with District Court 46-3-01, 309 Maple Avenue, DuBois, Pennsylvania against the Defendant, Nancy L. Berquist for the Non-Sufficient Funds check no. 1209 in the amount of \$100.00 on December 12, 2003.

18. On February 3, 2004, the Defendant, Nancy L. Berquist did make restitution on the above mentioned check through District Court 46-3-01.

19. The repossessed vehicle of the Defendant, Nancy L. Berquist, was sold pursuant to the terms and conditions of the Finance Agreement, and as a result, the Plaintiff, Murray's Ford, Inc. suffered a loss of \$2,303.55.

WHEREFORE, Plaintiff demands Judgment against the Defendant in the amount of \$2,303.55, plus interest, court costs and such other reasonable costs as the Court may allow.



Kate E. Reeser  
Representative  
Murray's Ford, Inc.

VERIFICATION

I verify that the statements made in this Complaint are true and correct.

I understand that false statements herein are made subject to the penalties of  
18 Pa. C.S. Section 4904 relating to Unsworn Falsification to Authorities.

Kate E. Leeser

COMMONWEALTH OF PENNSYLVANIA

COURT OF COMMON PLEAS

JUDICIAL DISTRICT

46th

NOTICE OF APPEAL

FROM

DISTRICT JUSTICE JUDGMENT

COMMON PLEAS NO.

04-586-CJ

NOTICE OF APPEAL

Notice is given that the appellant has filed in the above Court of Common Pleas an appeal from the judgment rendered by the District Justice on the date and in the case mentioned below.

NAME OF APPELLANT

Nancy L. Berquist

MAG. DIST. NO. OR NAME OF DJ.

46-3-01

ADDRESS OF APPELLANT

1117A South Main Street

CITY

DuBois

STATE

PA

ZIP CODE

15801

DATE OF JUDGMENT

3-31-04

IN THE CASE OF (Plaintiff)

Murray's Ford Inc.

(Defendant)

Nancy L. Berquist

CLAIM NO.

CV 0000078-04  
LT

SIGNATURE OF APPELLANT OR HIS ATTORNEY OR AGENT

*Kathleen J. Fawcett*

This block will be signed ONLY when this notation is required under Pa. R.C.P.J.P. No. 1008B.

This Notice of Appeal, when received by the District Justice, will operate as a SUPERSEDEAS to the judgment for possession in this case.

Signature of Prothonotary or Deputy

If appellant was CLAIMANT (see Pa. R.C.P.J.P. No. 1001(6) in action before District Justice, he MUST FILE A COMPLAINT within twenty (20) days after filing his NOTICE of APPEAL.

PRAECIPE TO ENTER RULE TO FILE COMPLAINT AND RULE TO FILE

(This section of form to be used ONLY when appellant was DEFENDANT (see Pa. R.C.P.J.P. No. 1001(7) in action before District Justice. IF NOT USED, detach from copy of notice of appeal to be served upon appellee).

PRAECIPE: To Prothonotary

Enter rule upon Murray's Ford Inc.

appellee(s), to file a complaint in this appeal

Name of appellee(s)

(Common Pleas No. 04-586-CJ) within twenty (20) days after service of rule or suffer entry of judgment of non pros.

*Kathleen J. Fawcett*

Signature of appellant or his attorney or agent

RULE: To Murray's Ford Inc.

~~appellee(s)~~

Name of appellee(s)

(1) You are notified that a rule is hereby entered upon you to file a complaint in this appeal within twenty (20) days after the date of service of this rule upon you by personal service or by certified or registered mail.

(2) If you do not file a complaint within this time, a JUDGMENT OF NON PROS WILL BE ENTERED AGAINST YOU.

(3) The date of service of this rule if service was by mail is the date of mailing.

Date: April 28, 2004

*Willie L. Khan*

Signature of Prothonotary or Deputy

FILED  
OCT 3 2004  
MAY 20 2004  
William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

Civil Division

Murray's Ford Inc.,  
Plaintiff

vs.

Nancy L. Berquist,  
Defendant

\*  
\* No.: 04-586-CD  
\*  
\* TYPE OF CASE: Civil  
\*  
\*  
\*  
\* TYPE OF PLEADING: Answer and Counter-  
\* Claim  
\*  
\*  
\* FILED ON BEHALF OF: Nancy L. Berquist  
\*  
\* COUNSEL OF RECORD FOR THIS PARTY:  
\* Robin Jean Foor, Esquire  
\*  
\* SUPREME COURT NO.: 41520  
\*  
\* MidPenn Legal Services  
\* 211 ½ East Locust Street  
\* Clearfield, Pennsylvania 16830  
\* (814) 765-9646  
\*  
\*

**FILED**

**JUN 09 2004**

William A. Shaw  
Prothonotary/Clerk of Courts

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

Murray's Ford Inc.  
Plaintiff

vs. : NO. 04-586-CD

Nancy L. Berquist,  
Defendant

TO: Murray's Ford Inc.

You are hereby notified to file a written response to the enclosed Counterclaim  
within twenty (20) days from service hereof or a judgment may be entered against you.

  
\_\_\_\_\_  
Robin Jean Foor, Esquire  
Attorney for Nancy L. Berquist  
MIDPENN LEGAL SERVICES  
211 1/2 East Locust Street  
Clearfield, PA 16830  
(814)765-9646

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

Murray's Ford Inc.  
Plaintiff

vs. : NO. 04-586-CD

Nancy L. Berquist,  
Defendant

ANSWER

Defendant, Nancy L. Berquist, by and through her attorneys, Robin Jean Foor, Esquire and MidPenn Legal Services, answer as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.
9. Defendant is without sufficient knowledge to answer. Strict proof is demanded.
10. Defendant is without sufficient knowledge to answer. Strict proof is demanded.
11. Admitted.
12. Admitted.

13. Defendant is without sufficient knowledge to answer. Strict proof is demanded.

14. Defendant is without sufficient knowledge to answer. Strict proof is demanded.

15. Defendant is without sufficient knowledge to answer. Strict proof is demanded.

16. Defendant is without sufficient knowledge to answer. Strict proof is demanded.

17. Admitted.

18. Admitted.

19. Defendant is without sufficient knowledge to answer. Strict proof is demanded.

#### COUNTER-CLAIM

20. Paragraphs 1through 19 are incorporated here as if fully set forth.

21. After disposing of the collateral, plaintiff failed to provide the defendant with an explanation of the deficiency.

WHEREFORE, the defendant requests this court find that the Plaintiff failed to comply with 13 Pa. C.S. 9616 and defendant is entitled to statutory damages of the credit service charge plus 10% of the principal amount of the obligation.



Robin Jean Foor, Esquire ID #41520  
MidPenn Legal Services, Inc.  
211 1/2 East Locust Street  
Clearfield, PA 16830  
(814)765-9646

VERIFICATION

I, Nancy L. Berquist, verify that the statements in the foregoing Answer and Counter-claim are true and correct. I understand that false statements that are made herein are made subject to penalties of 18 Pa.C.S. 4904 relating to unsworn falsification to authorities.

6/9/04  
Date

Nancy L Berquist  
Nancy L Berquist

FILED

3cc

3/14/04  
JDN 89 2004

Andy Four

William A. Shaw  
Prothonotary/Clerk of Courts

**COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:  
Robin Jean Foor  
Attorney at Law  
Mid Penn Legal Services  
211½ East Locust Street  
Clearfield, PA 16830

2. Article Number  
(Transfer from service label)

7002 3150 0006 5000 2050

**COMPLETE THIS SECTION ON DELIVERY**

## A. Signature

*Laura Robbins*

Agent  
 Addressee

B. Received by (Printed Name)  Date of Delivery  
*Laura Robbins* **MAY 24 2004**

D. Is delivery address different from item 1?  Yes  
if YES, enter delivery address below:  No

## 3. Service Type

Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

UNITED STATES POSTAL SERVICE



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

- Sender: Please print your name, address, and ZIP+4 in this box •

Kate E. Reeser

Murrays Ford, Inc.  
3007 Blinker Parkway  
DuBois, PA 15801

FILED

JUN 14 2004

William A. Shaw  
Prothonotary/Clerk of Courts

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

Kate E. Reeser  
Murrays Ford, Inc.

Plaintiff : District Justice Appeal  
vs : Case No. 04-586-C.D.

Nancy L. Berquist  
Defendant

## **CERTIFICATE OF SERVICE**

I, Kate E. Reeser, Plaintiff above named, do hereby certify that on the 24 day of May, 2004, I caused a certified copy of the Complaint to be mailed, first class – certified mail - postage prepaid, to the Defendant at her address as follows:

Robin Jean Foor, Attorney at Law  
Mid Penn Legal services  
211 ½ East Locust Street  
Clearfield, PA 16830

Kate E. Reeser  
Kate E. Reeser

FILED NO  
M 11-32674 cc  
JUN 14 2004

*Shaw*

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

Civil Division

Murray's Ford Inc.,  
Plaintiff

vs.

Nancy L. Berquist,  
Defendant

\*  
\* No.: 04-586-CD  
\*  
\* TYPE OF CASE: Civil  
\*  
\*  
\*  
\* TYPE OF PLEADING: Certificate of Service  
\*  
\*  
\*  
\* FILED ON BEHALF OF: Nancy L. Berquist  
\*  
\* COUNSEL OF RECORD FOR THIS PARTY:  
\* Robin Jean Foor, Esquire  
\*  
\*  
\* SUPREME COURT NO.: 41520  
\*  
\* MidPenn Legal Services  
\* 211 ½ East Locust Street  
\* Clearfield, Pennsylvania 16830  
\* (814) 765-9646  
\*  
\*

FILED

JUN 15 2004

William A. Cherry  
Prothonotary

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

Murray's Ford Inc.  
Plaintiff

vs. : NO. 04-586-CD

Nancy L. Berquist,  
Defendant

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Answer and Counterclaim has been served on  
Murray's Ford Inc. by mailing a true and correct copy by United States First Class Mail,  
postage prepaid addressed as follows:

Murray's Ford Inc.  
RR#1, Box 12  
DuBois, PA 15801

MidPenn Legal Services  
By:

*Robin Jean Foor*  
Robin Jean Foor, Esquire  
Attorney for Nancy L. Berquist

U.S. POSTAL SERVICE		CERTIFICATE OF MAILING	
MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE - POSTMASTER			
Received	at	211 1/2 EAST LOCUST STREET	CLEARFIELD, PA 16830
MIDPENN LEGAL SERVICES			
One piece of ordinary mail addressed to:			
<i>Murray's Ford, Inc</i>			
<i>RR #1, Box 12</i>			
<i>DuBois, PA 15801</i>			

Affix fee here in stamps  
or meter postage and  
postmark. Inquire of  
Postmaster for current  
fee.

CLEARFIELD  
PA 16830  
UNITED STATES POSTAL SERVICE  
JUN 9 2004  
CLEARFIELD, PA  
PB 8606439  
16830  
10904  
16830

FILED

O 1:23 AM '04 Dwy

JUN 15 2004

William A. Shaw  
Prothonotary

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

**MURRAY'S FORD, INC.**

Plaintiff

VS

**NANCY L. BERQUIST**

Defendant

District Justice Appeal  
CASE NO. 04-586-C.D.

Type of Pleading:  
Reply to Counter-Claim

Filed on Behalf of  
**PLAINTIFF**

Plaintiff's Address:  
RD 1 Box 12  
DuBois, PA 15801  
(814) 371-6600

**FILED** *fm*

JUL 12 2004  
William A. Shaw  
Prothonotary/Clerk of Courts  
*1 cent to Atty*

VERIFICATION

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

Kate E. Reeser

04-586  
Date & Person  
Piff  
Nancy Bergquist  
Robin Jean Took