

04-956-CD
GREAT SENECA FINANCIAL CORP. vs. BARBARA GELNETT, et al.

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

GREAT SENECA FINANCIAL CORP
Plaintiff

NO. 04956CD

vs.

CIVIL ACTION – LAW

BARBARA L GELNETT
ROBERT GELNETT
Defendant(s)

PRAECIPE TO DISMISS WRIT OF EXECUTION

To the Prothonotary:

Please dismiss the Writ of Execution which has been filed in the above-referenced
matter.


Dated: 12/28/05

Respectfully Submitted,



Amy F. Doyle #87062
Daniel F. Wolfson #20617
Philip C. Warholic #86341
Andrew C. Spears #87737
David R. Galloway #87326
Tonilyn M. Chippie #87852
Ronald M. Abramson #94266
Ronald S. Canter #94000
Bruce H. Cherkis #18837
WOLPOFF & ABRAMSON, LLP
Attorneys in the Practice of Debt Collection
4660 Trindle Rd., 3rd Floor
Camp Hill, PA 17011
(717) 303-6700

W&A File No. 108119965

FILED *acc*
13:35/61
JAN 03 2006 *1cc Def.*
William A. Shaw
Prothonotary/Clerk of Courts 

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

GREAT SENECA FINANCIAL CORP.,
A MARYLAND CORPORATION,

Plaintiff

vs.

BARBARA L. GELNETT
ROBERT GELNETT
636 SINGTON ROAD
MORRISDALE, PA 16858-7529

Defendant(s)

and

COUNTY NATIONAL BANK,

Garnishee

No. 2004-956-CD

DEC 16 2005
William A. Shaw
Prothonotary, Clerk of Courts
No. 9/C

CERTIFICATE OF SERVICE

I, Peter F. Smith, attorney for County National Bank in the above-captioned matter, hereby certify that I served the Answers to Interrogatories filed in this matter on the Attorney for the Plaintiff by U. S. First Class Mail and a true and correct copy of the Answers to Interrogatories on the Defendants by U.S. Certified Mail as follows:

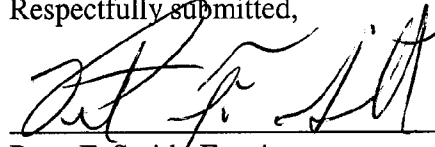
U. S. FIRST CLASS MAIL
David R. Galloway, Esquire
Wolpoff & Abramson, L.L.P.
4660 Trindle Road, 3rd Floor
Camp Hill, PA 17011

CERTIFIED MAIL
Barbara L. Gelnett
636 Sington Road
Morrisdale, PA 16858-7529

CERTIFIED MAIL
Robert M. Gelnett
R.R. 1 Box 645
Morrisdale, PA 16858-9524

Date: December 13, 2005

Respectfully submitted,



Peter F. Smith, Esquire
Attorney for the Garnishee
P.O. Box 130, 30 South Second Street
Clearfield, PA 16830
(814) 765-5595

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101018
NO: 04-956-CD
SERVICE # 1 OF 1
WRIT OF EXECUTION, INTERROGATORIES

PLAINTIFF: GREAT SENECA FINANCIAL CORPORATION

vs.

DEFENDANT: BARBARA GELNETT and ROBERT GELNETT

TO: COUNTY NATIONAL BANK, GARNISHEE

SHERIFF RETURN

NOW, December 02, 2005 AT 1:37 PM SERVED THE WITHIN WRIT OF EXECUTION, INTERROGATORIES ON COUNTY NATIONAL BANK DEFENDANT AT 1 SOUTH 2ND ST., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO LISA BROWN, HEAD TELLER A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION, INTERROGATORIES AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: NEVLING /


0/9:05 am Note.
DEC 16 2005 (UN)

| PURPOSE | VENDOR | CHECK # | AMOUNT |
|-----------------|---------|---------|--------|
| SURCHARGE | WOLPOFF | 32659 | 10.00 |
| SHERIFF HAWKINS | WOLPOFF | 32659 | 20.37 |

Sworn to Before Me This

_____ Day of _____ 2005

So Answers,


by Marklyn Hapner
Chester A. Hawkins
Sheriff

PRAECIPE FOR WRIT OF EXECUTION (MONEY JUDGMENT)
P.R.C.P. 3101 to 3149

GREAT SENECA FINANCIAL CORP.,
A MARYLAND CORPORATION,
ASSIGNEE OF FORWARD PROPERTIES,
ASSIGNEE OF BANKFIRST
P.O. BOX 1651
ROCKVILLE, MD 20849

Plaintiff

vs.

BARBARA L GELNETT
ROBERT GELNETT
636 SINGTON RD
MORRISDALE PA 16858-7529

Defendant(s)

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

herby cert... to be a true
and...
st...

NOV 1 / 2005.

JUDGMENT NO. 04956CD

Attes.

of Courts

PRAECIPE FOR WRIT OF EXECUTION
(MONEY JUDGMENT)

To the Prothonotary: PLEASE ISSUE WRIT OF EXECUTION IN THE ABOVE MATTER.

- (1) Directed to the Sheriff of CLEARFIELD COUNTY, Pennsylvania;
(2) against, BARBARA L GELNETT ROBERT GELNETT
636 SINGTON RD 636 SINGTON RD
MORRISDALE PA 16858-7529 MORRISDALE PA 16858

, Defendant(s);

- (3) and against, COUNTY NATIONAL BANK
601 MARKET ST
JOHNSONBURG PA 15845-1292 , Garnishee(s);

- (4) and index this writ
(a) against, BARBARA L GELNETT ROBERT GELNETT , Defendant(s) and
(b) against, COUNTY NATIONAL BANK , Garnishee(s),

as a lis pendens against the real property of the Defendant(s) in the name of the
Garnishee(s) as follows:

(Specifically describe property) *** GARNISH ONLY ***

You are directed to attach the property of the Defendant(s) not levied upon in the
possession of COUNTY NATIONAL BANK

601 MARKET ST
JOHNSONBURG PA 15845-1292

Garnishee(s)

All accounts including but not limited to all savings, checking and other accounts,
certificates of deposit, notes receivables, collateral, pledges, documents of
title, securities, coupons and safe deposit boxes.

Amount due \$ 909.92
Interest from 06/21/2004 To Be Determined
At an interest rate of 6% per year

Dated: 11/10/05 Total \$ 909.92 Plus costs & interest
40.00 Prothonotary costs

Amy F. Doyle #87062 / Daniel F. Wolfson #20617
Philip C. Warholic #86341 / Andrew C. Spears #87737
David R. Galloway #87326 / Tonilyn M. Chippie #87852
Ronald M. Abramson #94266 / Ronald S. Canter #94000
Bruce H. Cherkis #18837
WOLPOFF & ABRAMSON, L.L.P. / Counsel for Plaintiff
Attorneys in the Practice of Debt Collection

**WRIT OF EXECUTION and/or ATTACHMENT
COMMONWEALTH OF PENNSYLVANIA, COUNTY OF CLEARFIELD
CIVIL ACTION – LAW**

Great Seneca Financial Corporation,
Assignee of Forward Properties,
Assignee of BankFirst

Vs.

NO.: 2004-00956-CD

Barbara Gelnett and Robert Gelnett

County National Bank
Garnishee

TO THE SHERIFF OF CLEARFIELD COUNTY:

To satisfy the debt, interest and costs due GREAT SENECA FINANCIAL CORPORATION Assignee of FORWARD PROPERTIES, Assignee of BANKFIRST, Plaintiff(s) from BARBARA GELNETT and ROBERT GELNETT, Defendant(s):

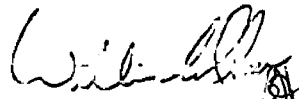
- (1) You are directed to levy upon the property of the defendant(s) and to sell interest(s) therein:
Garnish Only
- (2) You are also directed to attach the property of the defendant(s) not levied upon in the possession of:
County National Bank
Garnishee(s) as follows: All accounts including but not limited to all savings, checking and other accounts, certificates of deposit, notes receivables, collateral, pledges, documents of title, securities, coupons and safe deposit boxes and to notify the garnishee(s) that: (a) an attachment has been issued; (b) the garnishee(s) is/are enjoined from paying any debt to or for the account of the defendant(s) and from delivering any property of the defendant(s) or otherwise disposing thereof;
- (3) If property of the defendant(s) not levied upon and subject to attachment is found in the possession of anyone other than a named garnishee, you are directed to notify him/her that he/she has been added as a garnishee and is enjoined as above stated.

AMOUNT DUE/PRINCIPAL: \$909.92
INTEREST from 06/21/2004 at an
interest rate of 6% per year: To Be Determined
PROTH. COSTS: \$
ATTY'S COMM: \$
DATE: 11/17/2005

PAID: \$40.00

SHERIFF: \$

OTHER COSTS: \$



William A. Shaw
Prothonotary/Clerk Civil Division

Received this writ this 17 day
of Nov. A.D. 2005
At 3:30 ~~A.M.~~ P.M.

Chister A. Hawks
Sheriff My Mandy Hamer

Requesting Party: David R. Galloway
4660 Trindle Road, 3rd Floor
Camp Hill, PA 17011
(717) 303-6700

**WRIT OF EXECUTION and/or ATTACHMENT
COMMONWEALTH OF PENNSYLVANIA, COUNTY OF CLEARFIELD
CIVIL ACTION - LAW**

Great Seneca Financial Corporation,
Assignee of Forward Properties,
Assignee of BankFirst

Vs.

NO.: 2004-00956-CD

Barbara Gelnett and Robert Gelnett

County National Bank
Garnishee

TO THE SHERIFF OF CLEARFIELD COUNTY:

To satisfy the debt, interest and costs due GREAT SENECA FINANCIAL CORPORATION Assignee of FORWARD PROPERTIES, Assignee of BANKFIRST, Plaintiff(s) from BARBARA GELNETT and ROBERT GELNETT, Defendant(s):

- (1) You are directed to levy upon the property of the defendant(s) and to sell interest(s) therein:
Garnish Only
- (2) You are also directed to attach the property of the defendant(s) not levied upon in the possession of:
County National Bank
Garnishee(s) as follows: All accounts including but not limited to all savings, checking and other accounts, certificates of deposit, notes receivables, collateral, pledges, documents of title, securities, coupons and safe deposit boxes and to notify the garnishee(s) that: (a) an attachment has been issued; (b) the garnishee(s) is/are enjoined from paying any debt to or for the account of the defendant(s) and from delivering any property of the defendant(s) or otherwise disposing thereof;
- (3) If property of the defendant(s) not levied upon and subject to attachment is found in the possession of anyone other than a named garnishee, you are directed to notify him/her that he/she has been added as a garnishee and is enjoined as above stated.

AMOUNT DUE/PRINCIPAL: \$909.92
INTEREST from 06/21/2004 at an
interest rate of 6% per year: To Be Determined
PROTH. COSTS: \$
ATTY'S COMM: \$
DATE: 11/17/2005

PAID: \$40.00

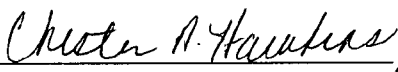

SHERIFF: \$

OTHER COSTS: \$



William A. Shaw
Prothonotary/Clerk Civil Division

Received this writ this 17 day
of Nov A.D. 2005
At P.O. A.M./P.M.


Sheriff


Requesting Party: David R. Galloway
4660 Trindle Road, 3rd Floor
Camp Hill, PA 17011
(717) 303-6700

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

GREAT SENECA FINANCIAL CORP., : NO. 04956CD
 A MARYLAND CORPORATION, :
 :
 Plaintiff :
 :
 vs. : CIVIL ACTION-LAW
 :
 BARBARA L GELNETT :
 ROBERT GELNETT :
 636 SINGTON RD :
 MORRISDALE PA 16858-7529 :
 :
 Defendant(s) :

INTERROGATORIES TO GARNISHEE IN AID OF EXECUTION

TO:

PURSUANT TO RULE 3114 OF THE RULES OF CIVIL PROCEDURE, THE FOLLOWING INTERROGATORIES HAVE BEEN SERVED UPON YOUR INSTITUTION. GARNISHEE IS HEREBY REQUIRED TO ANSWER EACH OF THE FOLLOWING INTERROGATORIES SEPARATELY AND FULLY. PLEASE COMPLETE THE FOLLOWING INTERROGATORIES TO ASSIST THE CREDITOR'S EFFORTS TO SATISFY THE LAWFUL OBLIGATION OF THE ABOVE REFERENCED DEBTOR(S).

IMPORTANT NOTICES AND INSTRUCTIONS TO GARNISHEE

A. You are required to file answers to the following Interrogatories within twenty (20) days after service upon you. Failure to do so may result in judgment against you.

B. The term "Defendant(s)" means the individual(s) or entity against whom the Writ of Execution was issued.

C. "You" means the main office and all branch offices, representatives, employees, and agents of your organization.

D. By service of the Writ of Execution upon you, all property of the Defendant(s) subject to attachment which is in your possession, custody or control is attached, including all property of the Defendant(s) which comes into your possession thereafter.

E. These Interrogatories are considered to be continuing and therefore should be modified or supplemented as you receive further or additional information.

F. Where exact information cannot be furnished, estimated information is to be supplied. When an estimate is to be used, it should be identified as such, and an explanation should be given as to the basis on which the estimate is made, and the reason the exact information cannot be furnished.

G. Where knowledge or information in possession of a party is requested, such request includes knowledge of the party's agents, representatives, and attorneys.

SS# 186 28 2214

PLAINTIFF'S INTERROGATORIES TO GARNISHEE
DEFENDANT(S) - BARBARA L GELNETT
ROBERT GELNETT
636 SINGTON RD
MORRISDALE PA 16858-7529

SS# 186 28 2214

1. DEPOSITORY ACCOUNTS: At the time you were served or at any subsequent time, state whether or not the Defendant(s) maintains any checking, savings, lines of credit, certificate of deposit's or other depository accounts with your institution. If so, state the identification numbers of those accounts, and the amount or amounts the Defendant(s) has in each account. If the Defendant(s) maintains any of these jointly with any other person, or persons, give their name and address.

1A. DIRECT DEPOSIT ACCOUNTS: Are any of the accounts you have listed above direct deposit accounts? If yes, please state the identification numbers of those accounts.

2. SAFE DEPOSIT BOXES: At the time you were served or at any subsequent time, state whether or not the Defendant(s) maintains any safe deposit box or boxes. If so, include the identification number or other designation of the box or boxes. Include a full description of the contents and also the amount of cash among those contents. If the Defendant(s) maintains any of these jointly with any other person or persons, give their full name and address.

3. PERSONAL PROPERTY: At the time you were served or at any subsequent time, state whether or not Defendant(s) owns any personal property that was in your possession and/or control. If so, include a full description of all personal property giving full value and present location. State also whether or not there are any encumbrances or liens holders, the present balance of the encumbrance. State where and when the encumbrances or liens was recorded. If the Defendant(s) owns any personal property jointly with any person or persons, give names and address.

4. OTHER ASSETS: At the time you were served or at any subsequent time, did you know of the existence of any other asset(s) of the Defendant(s) which are not disclosed in the preceding Interrogatories. If so, please set forth all details concerning those asset(s).

5. PROPERTY: At the time you were served or at any subsequent time, was there in your possession, custody, or control or in the joint possession, custody, or control of yourself and one or more other persons any property of any nature owned solely or in part by any Defendant(s)? If so, please describe for each Defendant(s) each item of property including its value.

6. REAL PROPERTY: At the time you were served or at any subsequent time, did you hold legal, or equitable title to any property of any nature owned solely or in part by the Defendant(s) or in which Defendant(s) held or claimed any interest? If so, describe for each Defendant(s) each item of property including its value and the interest held by the Defendant(s).

7. PROPERTY HELD AS A FIDUCIARY: At the time you were served or at any subsequent time, did you hold as a fiduciary any property in which any Defendant(s) had an interest? If so, please describe for each Defendant(s) the nature of the property including its value and the interest of Defendant(s).

8. TRANSFER OF PROPERTY: At any time before or after you were served, did any Defendant(s) transfer or deliver any property to you or to any person or place pursuant to your direction or consent. If so, for each Defendant(s) describe the property transferred or delivered including the dates of delivery or transfer and state the consideration paid.

9. FEES OUTSTANDING TO GARNISHEE: Are there any attorneys fees or processing fees charged by you against the Defendant(s) or account(s) of the Defendant(s) for the completion of this Answer. If yes, outline the exact amount of any fees due and owing to the garnishee or the attorney for the garnishee for the preparation of the Answer.



Amy F. Doyle #87062 / Daniel F. Wolfson #20617
 Philip C. Warholie #86341 / Andrew C. Spears #87737
 David R. Galloway #87326 / Tonilyn M. Chippie #87852
 Ronald M. Abramson #94266 / Ronald S. Canter #94000
 Bruce H. Cherkis #18837

WOLPOFF & ABRAMSON, L.L.P. / Counsel for Plaintiff
 Attorneys in the Practice of Debt Collection
 4660 Trindle Road, 3rd Floor, Camp Hill, PA 17011
 (717) 303-6700

Date: 11/10/05

PRAECIPE FOR WRIT OF EXECUTION (MONEY JUDGMENT)
P.R.C.P. 3101 to 3149

GREAT SENECA FINANCIAL CORP.,
A MARYLAND CORPORATION,
ASSIGNEE OF FORWARD PROPERTIES,
ASSIGNEE OF BANKFIRST
P.O. BOX 1651
ROCKVILLE, MD 20849

Plaintiff

vs.

BARBARA L GELNETT
ROBERT GELNETT
636 SINGTON RD
MORRISDALE PA 16858-7529

Defendant(s)

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

JUDGMENT NO. 04956CD

PRAECIPE FOR WRIT OF EXECUTION
(MONEY JUDGMENT)

110096
m12:05/1 with to
NOV 17 2003 SHFF
William A. Shaw
Prothonotary/Clerk of Courts 20.00

To the Prothonotary: PLEASE ISSUE WRIT OF EXECUTION IN THE ABOVE MATTER.

- (1) Directed to the Sheriff of CLEARFIELD COUNTY, Pennsylvania;
(2) against, BARBARA L GELNETT ROBERT GELNETT
636 SINGTON RD 636 SINGTON RD
MORRISDALE PA 16858-7529 MORRISDALE PA 16858

, Defendant(s);

- (3) and against, COUNTY NATIONAL BANK
601 MARKET ST
JOHNSONBURG PA 15845-1292 , Garnishee(s);

- (4) and index this writ
(a) against, BARBARA L GELNETT ROBERT GELNETT , Defendant(s) and
(b) against, COUNTY NATIONAL BANK , Garnishee(s),

as a lis pendens against the real property of the Defendant(s) in the name of the
Garnishee(s) as follows:

(Specifically describe property) *** GARNISH ONLY ***

You are directed to attach the property of the Defendant(s) not levied upon in the
possession of COUNTY NATIONAL BANK

601 MARKET ST
JOHNSONBURG PA 15845-1292

Garnishee(s)

All accounts including but not limited to all savings, checking and other accounts,
certificates of deposit, notes receivables, collateral, pledges, documents of
title, securities, coupons and safe deposit boxes.

Amount due \$ 909.92
Interest from 06/21/2004 To Be Determined
At an interest rate of 6% per year

Dated: 11/10/05

Total \$ 909.92 Plus costs & interest
40.00 Prothonotary costs

Amy F. Doyle #87062 / Daniel F. Wolfson #20617
Philip C. Warholc #86341 / Andrew C. Spears #87737
David R. Galloway #87326 / Tonilyn M. Chippie #87852
Ronald M. Abramson #94266 / Ronald S. Canter #94000
Bruce H. Cherkis #18837

WOLPOFF & ABRAMSON, L.L.P. / Counsel for Plaintiff
Attorneys in the Practice of Debt Collection

4660 Trindle Road, 3rd Floor, Camp Hill PA 17011 / (717) 303-6700

**WRIT OF EXECUTION and/or ATTACHMENT
COMMONWEALTH OF PENNSYLVANIA, COUNTY OF CLEARFIELD
CIVIL ACTION – LAW**

Great Seneca Financial Corporation,
Assignee of Forward Properties,
Assignee of BankFirst

Vs.

NO.: 2004-00956-CD

Barbara Gelnett and Robert Gelnett

County National Bank
Garnishee

TO THE SHERIFF OF CLEARFIELD COUNTY:

To satisfy the debt, interest and costs due GREAT SENECA FINANCIAL CORPORATION Assignee of FORWARD PROPERTIES, Assignee of BANKFIRST, Plaintiff(s) from BARBARA GELNETT and ROBERT GELNETT, Defendant(s):

- (1) You are directed to levy upon the property of the defendant(s) and to sell interest(s) therein:
Garnish Only
- (2) You are also directed to attach the property of the defendant(s) not levied upon in the possession of:
County National Bank
Garnishee(s) as follows: All accounts including but not limited to all savings, checking and other accounts, certificates of deposit, notes receivables, collateral, pledges, documents of title, securities, coupons and safe deposit boxes and to notify the garnishee(s) that: (a) an attachment has been issued; (b) the garnishee(s) is/are enjoined from paying any debt to or for the account of the defendant(s) and from delivering any property of the defendant(s) or otherwise disposing thereof;
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AMOUNT DUE/PRINCIPAL: \$909.92
INTEREST from 06/21/2004 at an
interest rate of 6% per year: To Be Determined
PROTH. COSTS: \$
ATTY'S COMM: \$
DATE: 11/17/2005

PAID: \$40.00
SHERIFF: \$

OTHER COSTS: \$

William A. Shaw
Prothonotary/Clerk Civil Division

Received this writ this _____ day
of _____ A.D. _____
At _____ A.M./P.M.

Requesting Party: David R. Galloway
4660 Trindle Road, 3rd Floor
Camp Hill, PA 17011
(717) 303-6700

Sheriff

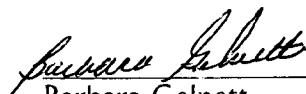
7

1. On December 15, 2003, Plaintiff filed a District Justice Complaint against Defendant alleging monies due and owing on Defendant's account with Plaintiff.
2. The parties hereto, by and through their counsel or individually, agree to the withdrawal of the District Justice action and the entry of Judgment in the amount of One Thousand One Hundred Seventy-Nine and 92/100 (\$1,179.92) Dollars.
3. The Defendant hereby agrees to make monthly payments on the Judgment in the amount of Thirty and 00/100 (\$30.00) Dollars, until this matter is paid in full.
4. The parties agree that the first payment on the Judgment was due on or before February 28, 2004 and all subsequent payments are due on or before the 28th day of each month, until this matter is paid in full.

5. Counsel for Plaintiff hereby agrees to take no post-Judgment action as long as the Defendant continues to make regular and timely monthly payments as indicated herein.

6. Counsel for the Plaintiff hereby certifies that they are authorized to enter into this instant Stipulation on behalf of their client.

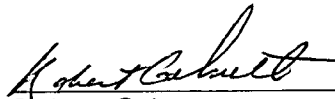
NOW, THEREFORE, the undersigned parties hereby request a Judgment be entered in favor of Plaintiff and against Defendant consistent with the terms of this Stipulation.



Barbara Gelnett
(Defendant)



Amy F. Wolfson, Esquire
Supreme Court I.D. #87062
WOLFSON & ASSOCIATES, P.C.
267 East Market Street
York, PA 17403
(717) 846-1252
Attorney for Plaintiff



Robert Gelnett
(Defendant)

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

| | | |
|--------------------------------|---|------------------|
| GREAT SENECA FINANCIAL | : | |
| CORPORATION, A MARYLAND | : | |
| CORPORATION ASSIGNEE OF | : | |
| FORWARD PROPERTIES ASSIGNEE OF | : | |
| BANKFIRST, | : | No. |
| Plaintiff | : | |
| | : | |
| vs. | : | CIVIL ACTION-LAW |
| BARBARA GELNETT | : | |
| AND | : | |
| ROBERT GELNETT, | : | |
| Defendant | : | |

STIPULATION OF JUDGMENT


AND NOW, this 12th day of April, 2004, come the parties to this action, by and through their respective counsel and/or individually, and hereby stipulate and agree as follows:

1. On December 15, 2003, Plaintiff filed a District Justice Complaint against Defendant alleging monies due and owing on Defendant's account with Plaintiff.
2. The parties hereto, by and through their counsel or individually, agree to the withdrawal of the District Justice action and the entry of Judgment in the amount of One Thousand One Hundred Seventy-Nine and 92/100 (\$1,179.92) Dollars.
3. The Defendant hereby agrees to make monthly payments on the Judgment in the amount of Thirty and 00/100 (\$30.00) Dollars, until this matter is paid in full.
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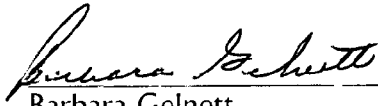
5. Counsel for Plaintiff hereby agrees to take no post-Judgment action as long as the Defendant continues to make regular and timely monthly payments as indicated herein.

6. Counsel for the Plaintiff hereby certifies that they are authorized to enter into this instant Stipulation on behalf of their client.

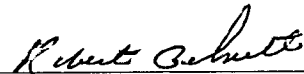
NOW, THEREFORE, the undersigned parties hereby request a Judgment be entered in favor of Plaintiff and against Defendant consistent with the terms of this Stipulation.



Amy F. Wolfson, Esquire
Supreme Court I.D. #87062
WOLFSON & ASSOCIATES, P.C.
267 East Market Street
York, PA 17403
(717) 846-1252
Attorney for Plaintiff



Barbara Gelnett
(Defendant)



Robert Gelnett
(Defendant)

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

GREAT SENECA FINANCIAL
CORPORATION A MARYLAND
CORPORATION ASSIGNEE OF
FORWARD PROPERTIES ASSIGNEE
OF BANKFIRST

Plaintiff

vs.

BARBARA GELNETT
AND
ROBERT GELNETT,

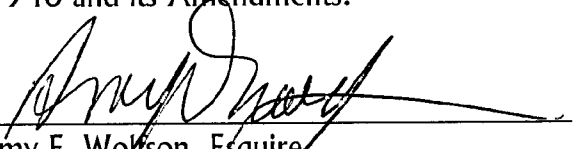
Defendant

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: No.
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: CIVIL ACTION - LAW
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AFFIDAVIT OF NON-MILITARY SERVICE

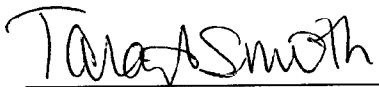
COMMONWEALTH OF PENNSYLVANIA :
:
COUNTY OF YORK :

I, Amy F. Wolfson, Esquire, being duly sworn according to law, depose and say that I am the Attorney for the Plaintiff in the above-captioned matter, and that to the best of my knowledge, information and belief Defendant, ROBERT GELNETT, above named, is over 21 years of age; is last know to reside at RD 1 BOX 636 SINGTON ROAD MORRISDALE, PA 16858, CLEARFIELD County, Pennsylvania; is not in the military service of the United States or its Allies, or otherwise within the provisions of the Soldiers' and Sailors' Civil Relief Act of Congress of 1940 and its Amendments.



Amy F. Wolfson, Esquire
Attorney for the Plaintiff
Attorney ID#87062
Wolpoff & Abramson, L.L.P.
267 East Market Street
York, PA 17403

SWORN and SUBSCRIBED
to before me this 12 day
of April, 2004.



Tara Smith
Notary Public

NOTARY PUBLIC
TARA SMITH
12/2/03

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

GREAT SENECA FINANCIAL
CORPORATION A MARYLAND
CORPORATION ASSIGNEE OF
FORWARD PROPERTIES ASSIGNEE
OF BANKFIRST

Plaintiff

vs.

BARBARA GELNETT
AND
ROBERT GELNETT,

Defendant

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: No.
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: CIVIL ACTION - LAW
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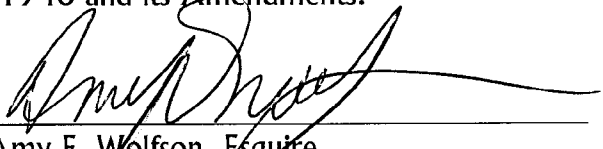
AFFIDAVIT OF NON-MILITARY SERVICE

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF YORK


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I, Amy F. Wolfson, Esquire, being duly sworn according to law, depose and say that I am the Attorney for the Plaintiff in the above-captioned matter, and that to the best of my knowledge, information and belief Defendant, BARBARA GELNETT, above named, is over 21 years of age; is last know to reside at RD 1 BOX 636 SINGTON ROAD MORRISDALE, PA 16858, CLEARFIELD County, Pennsylvania; is not in the military service of the United States or its Allies, or otherwise within the provisions of the Soldiers' and Sailors' Civil Relief Act of Congress of 1940 and its Amendments.



Amy F. Wolfson, Esquire
Attorney for the Plaintiff
Attorney ID#87062
Wolpoff & Abramson, L.L.P.
267 East Market Street
York, PA 17403

SWORN and SUBSCRIBED
to before me this 12 day
of April, 2004.



Notary Public

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

GREAT SENECA FINANCIAL
CORPORATION A MARYLAND
CORPORATION ASSIGNEE OF
FORWARD PROPERTIES ASSIGNEE
OF BANKFIRST

Plaintiff

vs.

BARBARA GELNETT
AND
ROBERT GELNETT,

Defendant

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:
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:
: No.
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:
: CIVIL ACTION - LAW
:
:
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CERTIFICATE OF RESIDENCE
PA. R. C. P. 236

I, hereby certify that the precise residence of Plaintiff is:

GREAT SENECA FINANCIAL CORPORATION A MARYLAND
CORPORATION ASSIGNEE OF FORWARD PROPERTIES
ASSIGNEE OF BANKFIRST
c/o WOLPOFF & ABRAMSON, L.L.P.
267 EAST MARKET STREET
YORK, PA 17403

and certify that the last known address of the within Defendant is:

BARBARA & ROBERT GELNETT
RD 1 BOX 636 SINGTON ROAD
MORRISDALE, PA 16858



Amy F. Wolfson, Esquire
WOLPOFF & ABRAMSON, L.L.P.
267 East Market Street
York, PA 17403
(717) 846-1252
ID No. 87062
Attorney for Plaintiff

GREAT SENECA FINANCIAL
CORPORATION A MARYLAND
CORPORATION ASSIGNEE OF
FORWARD PROPERTIES ASSIGNEE
OF BANKFIRST

BARBARA GELNETT
AND
ROBERT GELNETT

NOTICE OF JUDGMENT

- NOTICE SENT TO: BARBARA & ROBERT GELNETT
RD 1 BOX 636 SINGTON RD
MORRISDALE, PA 16858

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

GREAT SENECA FINANCIAL :
CORPORATION A MARYLAND :
CORPORATION ASSIGNEE OF :
FORWARD PROPERTIES ASSIGNEE :
OF BANKFIRST :
c/o WOLPOFF & ABRAMSON, L.L.P. :
267 EAST MARKET STREET :
YORK, PA 17403 :

vs.

BARBARA GELNETT :
AND :
ROBERT GELNETT :
RD 1 BOX 636 SINGTON ROAD: :
MORRISDALE, PA 16858 :

File No. _____

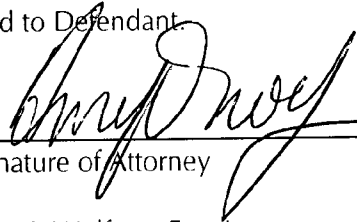
Civil Action - Law

PRAECIPE FOR SUMMONS

TO THE PROTHONOTARY/CLERK:

Issue summons in Law in the above case.

XX Writ of Summons shall be issued and forwarded to Defendant.



Signature of Attorney

Amy F. Wolfson, Esquire
WOLPOFF & ABRAMSON, L.L.P.
267 East Market Street
York, PA 17403
(717) 846-1252

Date: 4/12/04

Supreme Court ID Number 87062

* * * * *

SUMMONS IN CIVIL ACTION

TO: BARBARA & ROBERT GELNETT RD 1 BOX 636 SINGTON RD MORRISDALE, PA 16858 _____
(Defendant Name and Address)

YOU ARE NOTIFIED THAT THE ABOVE-NAMED PLAINTIFF(S) HAS/HAVE COMMENCED AN ACTION
AGAINST YOU.

Prothonotary/Clerk, Civil Division

Date: _____

by _____
Deputy