

05-377-CD
Geisinger vs. Richard Roos et al

Geisinger Clinic v. Mark Powell et al
2005-377-CD

GEISINGER CLINIC
PLAINTIFF

v.

RICHARD ROOS, and,
ANNE MARIE ROOS, his wife
DEFENDANTS

:IN THE COURT OF COMMON PLEAS
:OF CLEARFIELD COUNTY

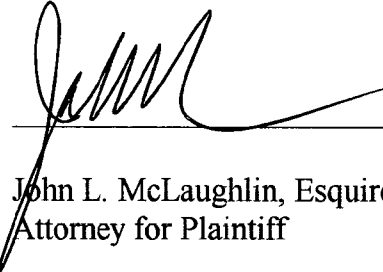
:
:
:CIVIL ACTION - LAW

:
:
: NO.: 2005-377-CP

PRAECIPE TO ENTER JUDGMENT


TO THE PROTHONOTARY:

Kindly enter Judgment upon default in the above-captioned matter against Richard Roos and Anne Marie Roos, his wife, of 485 Knox Run Road, Morrisdale, Pennsylvania, 16858, in the amount of Five Thousand Two Hundred Forty Eight Dollars and Sixty-two Cents (\$5,248.62) in favor of Plaintiff, Geisinger Clinic.


John L. McLaughlin, Esquire
Attorney for Plaintiff


ORDER

AND NOW, to wit, this 17 day of March, 2005, Judgment is entered against Defendants, Richard Roos and Anne Marie Roos, his wife, in favor of Plaintiff, Geisinger Clinic in the amount of \$5,248.62.


William Shaw, Prothonotary
Clearfield County

FILED

MAR 17 2005


William A. Shaw
Prothonotary/Clerk of Courts

NOTED TO DEF
STATEMENT TO ARTS

OFFICE OF THE PROTHONOTARY
COURT OF COMMON PLEAS
CLEARFIELD COUNTY, PA

TO: RICHARD ROOS and ANNE MARIE ROOS
485 Knox Run Road
Morrisdale, Pennsylvania, 16858

GEISINGER CLINIC	:	IN THE COURT OF COMMON PLEAS
PLAINTIFF	:	OF CLEARFIELD COUNTY
	:	
v.	:	
	:	CIVIL ACTION - LAW
RICHARD ROOS, and,	:	
ANNE MARIE ROOS, his wife	:	
DEFENDANTS	:	NO.:

Pursuant to Pa. R.C.P. 236, you are hereby notified that a JUDGMENT BY
DEFAULT has been entered against you in the above proceeding.

Date:

Prothonotary

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: **MONTOUR**

Mag. Dist. No.: **26-3-04**
MDJ Name: Hon. **MARVIN K. SHRAWDER**
Address: **MONTOUR COUNTY COURTHOUSE**
29 MILL ST
DANVILLE, PA
Telephone: **(570) 271-3022** **17821**

GEISINGER CLINIC
100 N. ACADEMY AVE.
DANVILLE, PA 17822

NOTICE OF JUDGMENT/TRANSCRIPT
CIVIL CASE

PLAINTIFF: **GEISINGER CLINIC**
100 N. ACADEMY AVE.
DANVILLE, PA 17822

VS.
DEFENDANT: **ROOS, RICHARD, ET AL.**
485 KNOW RUN ROAD
MORRISDALE, PA 16858

Docket No.: **CV-0000236-04**
Date Filed: **9/27/04**



THIS IS TO NOTIFY YOU THAT:

Judgment: **DEFAULT JUDGMENT PLTF**

☒ Judgment was entered for: (Name) **GEISINGER CLINIC**

☒ Judgment was entered against: (Name) **ROOS, ANNA MARIE**

in the amount of \$ **5,248.62** on: (Date of Judgment) **10/21/04**

☐ 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	\$ 5,120.12
Judgment Costs	\$ 128.50
Interest on Judgment	\$.00
Attorney Fees	\$.00
Total	\$ 5,248.62
Post Judgment Credits	\$ _____
Post Judgment Costs	\$ _____
=====	
Certified Judgment Total	\$ _____

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 MAGISTERIAL DISTRICT JUDGES, 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 MAGISTERIAL DISTRICT JUDGE.

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 MAGISTERIAL DISTRICT JUDGE IF THE JUDGMENT DEBTOR PAYS IN FULL, SETTLES, OR OTHERWISE COMPLIES WITH THE JUDGMENT.

10-21-04 Date **Marvin K. Shrawder**, Magisterial District Judge

I certify that this is a true and correct copy of the record of the proceedings containing the judgment.
2-14-05 Date **Mam & [Signature]**, Magisterial District Judge

My commission expires first Monday of January, **2010**.

SEAL

Mag. Dist. No.:

26-3-04

MDJ Name: Hon.

MARVIN K. SHRAWDERAddress: **MONTOUR COUNTY COURTHOUSE
29 MILL ST
DANVILLE, PA**Telephone: **(570) 271-3022 17821****NOTICE OF JUDGMENT/TRANSCRIPT
CIVIL CASE**

PLAINTIFF:

NAME and ADDRESS

**GEISINGER CLINIC
100 N. ACADEMY AVE.
DANVILLE, PA 17822**

VS.

DEFENDANT:

NAME and ADDRESS

**ROOS, RICHARD, ET AL.
485 KNOW RUN ROAD
MORRISDALE, PA 16858****GEISINGER CLINIC
100 N. ACADEMY AVE.
DANVILLE, PA 17822**Docket No.: **CV-0000236-04**Date Filed: **9/27/04****THIS IS TO NOTIFY YOU THAT:**

Judgment:

DEFAULT JUDGMENT PLTF☒ Judgment was entered for: (Name) **GEISINGER CLINIC**☒ Judgment was entered against: (Name) **ROOS, RICHARD**in the amount of \$ **5,248.62** on: (Date of Judgment) **10/21/04**☐ 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	\$ <u>5,120.12</u>
Judgment Costs	\$ <u>128.50</u>
Interest on Judgment	\$ <u>.00</u>
Attorney Fees	\$ <u>.00</u>
Total	\$ <u>5,248.62</u>

Post Judgment Credits	\$ _____
Post Judgment Costs	\$ _____
=====	

Certified Judgment Total \$ _____

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 MAGISTERIAL DISTRICT JUDGES, 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 MAGISTERIAL DISTRICT JUDGE.

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 MAGISTERIAL DISTRICT JUDGE IF THE JUDGMENT DEBTOR PAYS IN FULL, SETTLES, OR OTHERWISE COMPLIES WITH THE JUDGMENT.

10-21-04 Date **Marvin K. Shrawder**, Magisterial District Judge

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

2-14-05 Date **Marvin K. Shrawder**, Magisterial District Judge

My commission expires first Monday of January, **2010**.

SEAL

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

Geisinger Clinic
Plaintiff(s)

No.: 2005-00377-CD

Real Debt: \$5,248.62

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Richard Roos
Anna Marie Roos
Defendant(s)

Entry: \$20.00

Instrument: M.D.J.

Date of Entry: March 17, 2005

Expires: March 17, 2010

Certified from the record this March 17, 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

FILED

FEB 22 2010

William A. Shaw
Prothonotary/Clerk of Courts

GEISINGER CLINIC
PLAINTIFF

v.

RICHARD ROOS, and,
ANNE MARIE ROOS, his wife
DEFENDANTS

: IN THE COURT OF COMMON PLEAS
: OF CLEARFIELD COUNTY

: CIVIL ACTION - LAW

: NO. 2005-377-CD

: REVIVAL NO. 2005-377-CD

2 CLERK TO
ATTY
w/2 WRIT OF REV.
TO ATTN

PRAECIPE FOR REVIVAL

TO THE PROTHONOTARY:

Kindly issue Writ of Revival of Judgment entered to Number 2005-377-CD and index it in the judgment index against Richard Roos and Anne Marie Roos, his wife, in the amount of Five Thousand Two Hundred Forty-eight Dollars and Sixty-two Cents (\$5,248.62).



Robert L. Marks, Jr., Esquire

I. D. No.: 81964

Marks, McLaughlin and Dennehy
12 West Market Street
Danville, PA 17821
(570) 275-3411

GEISINGER CLINIC	:	IN THE COURT OF COMMON PLEAS
PLAINTIFF	:	OF CLEARFIELD COUNTY
	:	
v.	:	
	:	CIVIL ACTION - LAW
	:	
RICHARD ROOS, and,	:	NO. 2005-377-CD
ANNE MARIE ROOS, his wife	:	REVIVAL NO. <u>2005-377-CD</u>
DEFENDANTS	:	

WRIT OF REVIVAL

TO: RICHARD ROOS
485 KNOX RUN ROAD
MORRISDALE, PA 16858

(1) You are notified that the Plaintiff has commenced a proceeding to revive the lien of the judgment entered at 2005-377-CD.

(2) The Plaintiff claims that the amount due and unpaid of Five Thousand Two Hundred Forty-eight Dollars and Sixty-two Cents (\$5,248.62).


(3) You are required within twenty (20) days after service of the Writ to file an Answer to otherwise plead to this Writ. If you fail to do so judgment of revival in the amount claimed by the Plaintiffs may be entered 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.

Daniel J. Nelson, Court Administrator
Clearfield County Courthouse
230 E. Market Street
Clearfield, PA 16830
814-765-2651, Ext. 5982

DATE: FEB 22, 2010



Prothonotary
Clearfield County

GEISINGER CLINIC	:	IN THE COURT OF COMMON PLEAS
PLAINTIFF	:	OF CLEARFIELD COUNTY
	:	
v.	:	
	:	CIVIL ACTION - LAW
RICHARD ROOS, and,	:	
ANNE MARIE ROOS, his wife	:	NO. 2005-377-CD
DEFENDANTS	:	REVIVAL NO. <u>2005-377-CD</u>

WRIT OF REVIVAL

**TO: ANNE MARIE ROOS
485 KNOX RUN ROAD
MORRISDALE, PA 16858**

(1) You are notified that the Plaintiff has commenced a proceeding to revive the lien of the judgment entered at 2005-377-CD.

(2) The Plaintiff claims that the amount due and unpaid of Five Thousand Two Hundred Forty-eight Dollars and Sixty-two Cents (\$5,248.62).

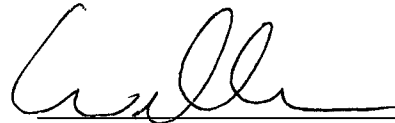
(3) You are required within twenty (20) days after service of the Writ to file an Answer to otherwise plead to this Writ. If you fail to do so judgment of revival in the amount claimed by the Plaintiffs may be entered without a hearing and you may lose your property or other important rights.

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.

Daniel J. Nelson, Court Administrator
Clearfield County Courthouse
230 E. Market Street
Clearfield, PA 16830
814-765-2651, Ext. 5982

DATE: FEB. 22, 2010

A handwritten signature in black ink, appearing to be 'C. Nelson', written over a horizontal line.

Prothonotary
Clearfield County

CA

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

GEISINGER CLINIC,
Plaintiff

v.

RICHARD ROOS and
ANNE MARIE ROOS
Defendants

*
*
*
*
*
*
*
*

Docket No. 2005-377-CD

Type of Pleading:
PRELIMINARY OBJECTIONS

Filed on behalf of:
RICHARD ROOS and ANNE MARIE ROOS

Counsel of Record of this party:

Eric E. Cummings, Esquire
PA I.D. No. 206194

THE LAW OFFICES OF KOERBER &
CUMMINGS, LLC
110 N. Second Street
P.O. Box 1320
Clearfield, PA 16830
(814) 765-9611

FILED 4cc

APR 09 2012

William A. Shaw
Prothonotary/Clerk of Courts

Atty Cummings

OK

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

GEISINGER CLINIC,
Plaintiff

v.

RICHARD ROOS and
ANNE MARIE ROOS
Defendants

*
*
*
*
*
*
*
*

Docket No. 2005-377-CD

PRELIMINARY OBJECTIONS OF DEFENDANTS

COMES NOW, Richard Roos and Anne Marie Roos, his wife, Defendants to the above-referenced matter, by and through their legal counsel, The Law Offices of Koerber & Cummings, LLC and sets forth the following Preliminary Objections and files the within Preliminary Objections:

**I.
LEGAL INSUFFICIENCY OF A PLEADING (DEMURRER)**

(1) Defendants file these Preliminary Objections pursuant to Pa.R.C.P. 1028(a)(4) which permits a party to file Preliminary Objection as to legal insufficiency of a pleading, in the form of a demurrer.

(2) Defendants also file these Preliminary Objections pursuant to Pa.R.C.P. 3030(a).

(3) Defendants demur as to the time lapse between the Writ of Revival filed by Plaintiff on or about February 2010, along with a corresponding Notice filed over two (2) years later in March of 2012; *if the Notice received is even related to the Writ of Revival.*

(4) Defendants demur as to the form of the Notice alleging default as it is unclear on its face and unknown as to what the notice itself even pertains to.

WHEREFORE, Your Defendants respectfully requests This Honorable Court dismiss this action with prejudice and order that any lien of judgment entered under Docket Number 2005-377-CD has failed to be properly revived by Plaintiff.

Respectfully submitted,

THE LAW OFFICES OF KOERBER &
CUMMINGS, LLC

By: 

Eric E. Cummings, Esquire

Attorney for Defendants: Richard Roos and
Anne Marie Roos

CA

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

GEISINGER CLINIC,
Plaintiff

v.

RICHARD ROOS and
ANNE MARIE ROOS
Defendants

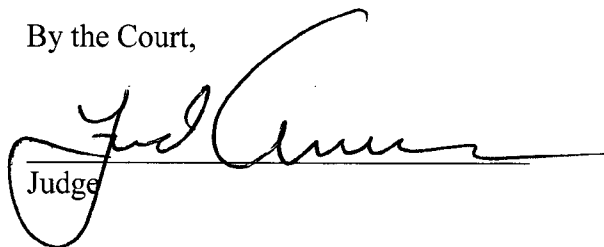
*
*
*
*
*
*
*
*

Docket No. 2005-377-CD

ORDER

AND NOW, this 10 day of April, 2012, upon consideration of
the Preliminary Objections filed by Defendants, Richard Roos and Anne Marie Roos, it is the
ORDER and **DECREE** of this Court that this matter shall be scheduled for Oral Argument before
the Court on the 25th day of May, 2012 at 3:00 p.m. in Courtroom No.
1, at the Clearfield County Courthouse.

By the Court,


Judge

FILED 4cc
9/4/00301
APR 10 2012
William A. Shaw
Prothonotary/Clerk of Courts
Cummins
CW

FILED 3cc
MAY 04 2012 3 Certificates to
Atty
William A. Shaw
Prothonotary/Clerk of Courts Atty pd. \$7.00

GEISINGER CLINIC
PLAINTIFF

v.

RICHARD ROOS, and,
ANNE MARIE ROOS, his wife
DEFENDANTS

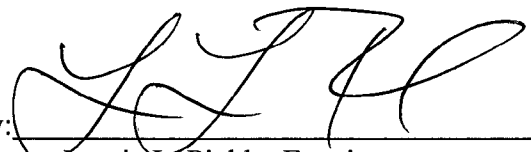
: IN THE COURT OF COMMON PLEAS
: OF CLEARFIELD COUNTY
:
:
: CIVIL ACTION - LAW
:
: NO. 2005-377-CD
: REVIVAL NO. 2005-377-CD

PRAECIPE TO SATISFY

TO THE PROTHONOTARY:

Kindly mark the above-captioned matter settled, discontinued and satisfied.

GEISINGER CLINIC

By: 
Laurie L. Pickle, Esquire
Attorney for Plaintiff

ORDER

AND NOW, to wit, this _____ day of _____, 2012, the above-captioned
matter is hereby satisfied.

Prothonotary
Clearfield County

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

CIVIL DIVISION

CERTIFICATE OF SATISFACTION OF JUDGMENT

Geisinger Clinic

No.: 2005-00377-CD

Vs.

Debt: \$5,248.62

Richard Roos
Anna Marie Roos

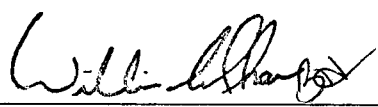
Atty's Comm.:

Interest From:

Cost: \$7.00

NOW, Friday, May 04, 2012, directions for satisfaction having been received, and all costs having been paid, SATISFACTION was entered of record.

Certified from the record this 4th day of May, A.D. 2012.



Prothonotary