

05-377-CD

Geisinger vs. Richard Roos et al

2005-377-CD

Geisinger Clinic v. Mark Powell et al

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.: 2665-377-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
m/2106/m
William A. Shaw
Prothonotary/Clerk of Courts

NOTE TO DEF.

STATEMENT TO AFR

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. :
RICHARD ROOS, and, : CIVIL ACTION - LAW
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: 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

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	\$ <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 JUDGEMENT 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

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

NOTICE OF JUDGMENT/TRANSCRIPT
CIVIL CASE

PLAINTIFF:

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

NAME and ADDRESS

DEFENDANT:

ROOS, RICHARD, ET AL.
485 KNOW RUN ROAD
MORRISDALE, PA 16858

VS.

NAME and ADDRESS

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



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

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: _____

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>

This case dismissed without prejudice.

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

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

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

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.

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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 ^{ED}

FEB 22 2010

5 12:05 PM
William A. Shaw
Prothonotary/Clerk of Courts

2 CLEAS

ATTN
w/2 Writs of Rev.
to Atty

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 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.
:
RICHARD ROOS, and, : CIVIL ACTION - LAW
ANNE MARIE ROOS, his wife : NO. 2005-377-CD
DEFENDANTS : REVIVAL NO. 2005-377-CD

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, 2016



Prothonotary
Clearfield County

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

WRIT OF REVIVAL

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

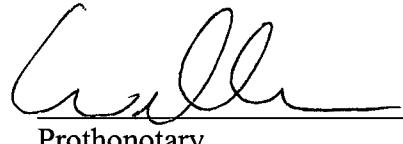
- (1) You are notified that the Plaintiff has commenced a proceeding to revive the
lien of the judgment entered at 2005-377-CD.
- (2) The Plaintiff claims that the amount due and unpaid of Five Thousand Two
Hundred Forty-eight Dollars and Sixty-two Cents (\$5,248.62).
- (3) You are required within twenty (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



Prothonotary
Clearfield County

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

GEISINGER CLINIC,
Plaintiff

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v.

Docket No. 2005-377-CD

RICHARD ROOS and
ANNE MARIE ROOS
Defendants

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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

CA
S FILED 4CC
04/13/2012 Atty Cummings
APR 09 2012
William A. Shaw
Prothonotary/Clerk of Courts
GK

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

GEISINGER CLINIC,
Plaintiff

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*
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v.

Docket No. 2005-377-CD

RICHARD ROOS and
ANNE MARIE ROOS
Defendants

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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

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

GEISINGER CLINIC,
Plaintiff

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v.

Docket No. 2005-377-CD

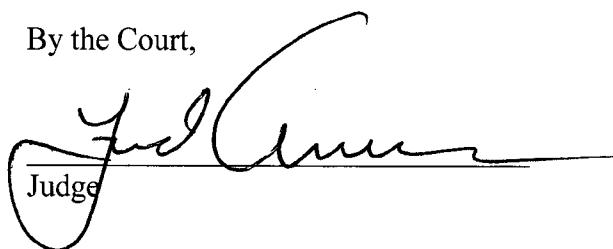
RICHARD ROOS and
ANNE MARIE ROOS
Defendants

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*

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

5 **FILED**
04/02/2012 4:44 PM
APR 10 2012 AAG
William A. Shaw
Prothonotary/Clerk of Courts
Cummings
GW

FILED

11:07 AM
MAY 04 2012

3CCa

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 *OK*
: OF CLEARFIELD COUNTY
:
:
: CIVIL ACTION - LAW
:
: NO. 2005-377-CD
: REVIVAL NO. 2005-377-CD

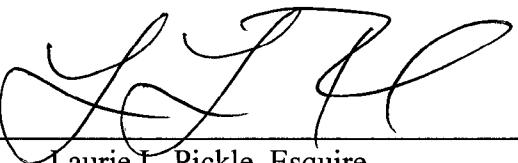
PRAECIPE TO SATISFY

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

No.: 2005-00377-CD

Geisinger Clinic

Debt: \$5,248.62

Vs.

Atty's Comm.:

Richard Roos

Anna Marie Roos

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