

2006-359-CD  
TD Bank vs Adam Galaher et al

06-359-CD  
Target Natl Bank vs Adam Galaher

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

TARGET NATIONAL BANK : NO. 06-359-CD  
 FKA RETAILERS NATIONAL BANK :  
 T/A TARGET VISA :  
 3701 WAYZATA BLVD :  
 MAILSTOP 3C-G :  
 MINNEAPOLIS, MN 54416 :

Plaintiff  
 vs. :

ADAM C GALAHER :

Defendant(s) :

## PRAECIPE FOR JUDGMENT

Mr./Ms. Clerk:

Please enter Judgment in favor of Plaintiff and against Defendant(s),  
 ADAM C GALAHER and ,  
 pursuant to the District Justice Transcript.

( X )	Amount due	\$ 3601.90
	Less credits	\$
	TOTAL	\$ 3601.90 , plus interest and costs

( X ) I certify that the foregoing assessment of damages is for specified amounts alleged to be due in the complaint and is calculable as a sum certain from the complaint.

( X ) Pursuant to Pa.R.C.P. 237 (Notice of Praeclipe for final judgment or decree), I certify that a copy of this praecipe has been mailed to each other party who has appeared in the action or to his/her Attorney of Record.

DATE: 2/28/06 Signature: W. Shaffer

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

NOW, March 8, 2006, JUDGMENT IS ENTERED AS ABOVE.

W. Shaffer  
 Prothonotary/Clerk, Civil Division

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

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: **CLEARFIELD**

Mag. Dist. No.:

**46-3-03**

MDJ Name: Hon.

**MICHAEL A. RUDELLA**

Address: **131 ROLLING STONE ROAD  
PO BOX 210  
KYLERTOWN, PA**

Telephone: **(814) 345-6789**

**16847-0444**

**NOTICE OF JUDGMENT/TRANSCRIPT  
CIVIL CASE**

PLAINTIFF:

**WOLPOFF AND ABRAMSON LLP  
267 E. MARKET ST.  
YORK, PA 17403-5774**

NAME and ADDRESS

DEFENDANT:

**GALAHER, ADAM C.  
1680 STATE STREET  
OSCEOLA MILLS, PA 16666-1648**

NAME and ADDRESS

**MICHAEL A. RUDELLA  
131 ROLLING STONE ROAD  
PO BOX 210  
KYLERTOWN, PA 16847-0444**

Docket No.: **CV-0000289-05**  
Date Filed: **8/26/05**



**THIS IS TO NOTIFY YOU THAT:**

Judgment:

**DEFAULT JUDGMENT PLTF**

Judgment was entered for: (Name) **WOLPOFF AND ABRAMSON, LLP**

Judgment was entered against: (Name) **GALAHER, ADAM C.**

in the amount of \$ **3,601.90** on: (Date of Judgment) **9/30/05**

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>3,518.90</b>
Judgment Costs	\$ <b>83.00</b>
Interest on Judgment	\$ <b>.00</b>
Attorney Fees	\$ <b>.00</b>
<b>Total</b>	\$ <b>3,601.90</b>
Post Judgment Credits	\$ _____
Post Judgment Costs	\$ _____
<b>Certified Judgment Total</b> \$ <b>3601.90</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 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.

9-30-05 Date

M A Rudella

, Magisterial District Judge

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

1/10/06 Date

M A Rudella

, Magisterial District Judge

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

AOPC 315-05

DATE PRINTED: **9/30/05 11:02:44 AM**

SEAL

**143590383**

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

TARGET NATIONAL BANK : No.  
 FKA RETAILERS NATIONAL BANK :  
 T/A TARGET VISA :  
 3701 WAYZATA BLVD :  
 MAILSTOP 3C-G :  
 MINNEAPOLIS, MN 54416 :  
 Plaintiff :  
 vs. : CIVIL ACTION - LAW  
 ADAM C GALAHER :  
 Defendant(s) :

## AFFIDAVIT OF NON-MILITARY SERVICE

COMMONWEALTH OF PENNSYLVANIA :  
 :  
 COUNTY OF CUMBERLAND :

The undersigned counsel, 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,  
 ADAM C GALAHER , above-named, is over 21 years of age; is last  
 known to reside at 1680 STATE ST  
 OSCEOLA MILLS PA 16666-1648

County of CLEARFIELD , Pennsylvania; is not in the military service of  
 the United States or its Allies, or otherwise within the provisions of the  
 Servicemembers Civil Relief Act and its Amendments.

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal  
 Kimberly L. Eisenhauer, Notary Public  
 Hampden Twp., Cumberland County  
 Commission Expires Nov. 17, 2009

Notary Public Commission Number

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

SWORN and SUBSCRIBED to before me this 28 day of February, 2010.

Kimberly Eisenhauer  
 Notary Public

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

TARGET NATIONAL BANK	:	No.
FKA RETAILERS NATIONAL BANK	:	
T/A TARGET VISA	:	
3701 WAYZATA BLVD	:	
MAILSTOP 3C-G	:	
MINNEAPOLIS, MN 54416	:	
Plaintiff	:	
vs.	:	CIVIL ACTION - LAW
ADAM C GALAHER	:	
Defendant(s)	:	

CERTIFICATE OF RESIDENCE  
PA. R.C.P. 236

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

TARGET NATIONAL BANK  
FKA RETAILERS NATIONAL BANK  
T/A TARGET VISA  
3701 WAYZATA BLVD  
MAILSTOP 3C-G  
MINNEAPOLIS, MN 54416

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

ADAM C GALAHER  
1680 STATE ST  
OSCEOLA MILLS PA 16666-1648

*C*

---

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

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

TARGET NATIONAL BANK : NO. 06-359-CD  
 FKA RETAILERS NATIONAL BANK :  
 T/A TARGET VISA :  
 3701 WAYZATA BLVD :  
 MAILSTOP 3C-G :  
 MINNEAPOLIS, MN 54416 :  
 Plaintiff :  
 VS. : CIVIL ACTION - LAW  
 ADAM C GALAHER :  
 1680 STATE ST :  
 OSCEOLA MILLS PA 16666-1648 :  
 Defendant(s) :

## NOTICE OF ORDER, DECREE OR JUDGMENT

TO: ADAM C GALAHER

1680 STATE ST  
OSCEOLA MILLS PA 16666-1648

You are hereby notified that the following ORDER, DECREE or JUDGMENT has been entered against you on March 8, 2006 in accordance with the provisions of Pa. R.C.P. 236.

- Decree Nisi in Equity
- Final Decree in Equity
- Judgment of  Confession  Verdict  
 Default  Non-suit  
 Non-pros  Arbitration Award
- Judgment is in the amount of \$ , plus costs.
- District Justice transcript of judgment in civil action in the amount of \$ 3601.90 , plus costs.
- If not satisfied within sixty (60) days, your motor vehicle operator's license will be suspended by the Pennsylvania Department of Transportation.

By: Willie M. Sharpen  
Prothonotary

If you have any questions regarding this Notice, please contact the filing party.

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  
 4660 Trindle Road, 3rd Floor, Camp Hill, PA 17011 / (717) 303-6700  
 (This Notice is given in accordance with Pa. R.C.P. 236.)

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

Target National Bank  
Plaintiff(s)

No.: 2006-00359-CD

Real Debt: \$3,601.90

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Adam C. Galaher  
Defendant(s)

Entry: \$20.00

Instrument: DJ Judgment

Date of Entry: March 8, 2006

Expires: March 8, 2011

Certified from the record this 8th day of March, 2006.



\_\_\_\_\_  
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

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

TARGET NATIONAL BANK : IN THE COURT OF COMMON PLEAS OF  
FKA RETAILERS NATIONAL BANK CLEARFIELD COUNTY, PENNSYLVANIA  
T/A TARGET VISA :  
3701 WAYZATA BLVD :  
MAILSTOP 3C-G :  
MINNEAPOLIS, MN 54416 :  
Plaintiff :  
vs. : JUDGMENT NO. 06359CD  
ADAM C GALAHER :  
130 LITTLE SPIKE RD :  
OSCEOLA MILLS PA 16666-1638 : PRAECIPE FOR WRIT OF EXECUTION  
(MONEY JUDGMENT)  
Defendant(s)

FILED Atty pd 20.00  
m 15 AD  
FEB 02 2007 30049  
writs to Shff

William A. Shaw  
Prothonotary/Clerk of Courts

(6K)

To the Prothonotary: PLEASE ISSUE WRIT OF EXECUTION IN THE ABOVE MATTER.  
(1) Directed to the Sheriff of CLEARFIELD COUNTY, Pennsylvania;  
(2) against, ADAM C GALAHER  
130 LITTLE SPIKE RD  
OSCEOLA MILLS PA 16666-1638

, Defendant(s);  
(3) and against, FIRST COMMONWEALTH BANK  
709 HANNAH ST  
HOUTZDALE PA 16651-1238 , Garnishee(s);  
(4) and index this writ  
(a) against, ADAM C GALAHER , Defendant(s) and  
(b) against, FIRST COMMONWEALTH 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 FIRST COMMONWEALTH BANK

709 HANNAH ST  
HOUTZDALE PA 16651-1238

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 \$ 3601.90  
Interest from 09/30/2005 To Be Determined  
At an interest rate of 6% per year

Dated: 1/30/07

Total \$ 3601.90 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  
4660 Trindle Road, 3rd Floor, Camp Hill, PA 17011 / (717) 303-6700

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

TARGET NATIONAL BANK : NO. 06359CD  
FKA RETAILERS NATIONAL BANK :  
Plaintiff :  
vs. : CIVIL ACTION-LAW  
ADAM C GALAHER :  
130 LITTLE SPIKE RD :  
OSCEOLA MILLS PA 16666-1638 :  
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# XXX-XX-6468

PLAINTIFF'S INTERROGATORIES TO GARNISHEE  
DEFENDANT(S) - ADAM C GALAHER130 LITTLE SPIKE RD  
OSCEOLA MILLS PA 16666-1638

SS# XXX-XX-6468

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 joining 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 and 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. Warholic #86341 / Andrew C. Spears #87737  
David R. Galloway #87326 / Tonilyn M. Chippie #87852  
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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: 1/30/07

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

Target National Bank f/k/a Retailers  
National Bank t/a Target Visa

Vs.

NO.: 2006-00359-CD

Adam C. Galaher

First Commonwealth Bank  
Garnishee

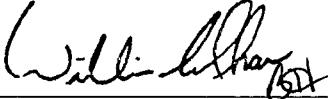
**TO THE SHERIFF OF CLEARFIELD COUNTY:**

To satisfy the debt, interest and costs due TARGET NATIONAL BANK, f/k/a Retailers National Bank t/a Target Visa Plaintiff(s) from ADAM C. GALAHER, Defendant(s):

- (1) You are directed to levy upon the property of the defendant(s) and to sell interest(s) therein:  
Personal Property
- (2) You are also directed to attach the property of the defendant(s) not levied upon in the possession of:  
First Commonwealth 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.
- (4) **If Social Security or Supplemental Income funds are directly deposited into an account of the defendant, the levy and attachment shall not include any funds that may be traced to Social Security direct deposits. In addition, the levy and attachment shall not include \$300.00 in the account of the defendant.**

AMOUNT DUE/PRINCIPAL: \$3,601.90  
INTEREST from 09/30/2005 at an interest  
rate of 6% per year  
ATTY'S COMM: \$  
DATE: 02/02/2007

PROTHONOTARY'S COSTS 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.

Sheriff

Requesting Party: Wolpoff & Abramson, LLP  
4660 Trindle Road, 3rd Floor  
Camp Hill, PA 17011  
(717) 303-6700

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102405  
NO: 06-359-CD  
SERVICE # 1 OF 1  
WRIT OF EXECUTION; INTERROGATORIES TO

GARNISHEE

PLAINTIFF: TARGET NATIONAL BANK f/k/a RETAILERS NATIONAL BANK t/a  
TARGET VISA

vs.

DEFENDANT: ADAM C. GALAHER  
TO: FIRST COMMONWEALTH BANK, Garnishee

**SHERIFF RETURN**

---

NOW, February 07, 2007 AT 9:45 AM SERVED THE WITHIN WRIT OF EXECUTION; INTERROGATORIES TO GARNISHEE ON FIRST COMMONWEALTH BANK, Garnishee DEFENDANT AT 709 HANNAH ST., HOUTZDALE, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO DIANE CASSICK, PERSON IN CHARGE A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION; INTERROGATORIES TO GARNISHEE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DAVIS / MORGILLO

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	WOLPOFF	456006	10.00
SHERIFF HAWKINS	WOLPOFF	456006	35.85

FILED  
9:15 AM (AT)  
FEB 08 2007

William A. Shaw  
Prothonotary/Clerk of Courts

Sworn to Before Me This

\_\_\_\_ Day of \_\_\_\_\_ 2007

So Answers,



Chester A. Hawkins  
Sheriff

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

Target National Bank f/k/a Retailers  
National Bank t/a Target Visa

Vs.

NO.: 2006-00359-CD

Adam C. Galaher

First Commonwealth Bank  
Garnishee

**TO THE SHERIFF OF CLEARFIELD COUNTY:**

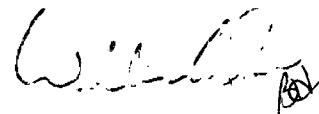
To satisfy the debt, interest and costs due TARGET NATIONAL BANK, f/k/a Retailers National Bank t/a Target Visa Plaintiff(s) from ADAM C. GALAHER, Defendant(s):

- (1) You are directed to levy upon the property of the defendant(s) and to sell interest(s) therein:  
Personal Property
- (2) You are also directed to attach the property of the defendant(s) not levied upon in the possession of:  
First Commonwealth 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.
- (4) **If Social Security or Supplemental Income funds are directly deposited into an account of the defendant, the levy and attachment shall not include any funds that may be traced to Social Security direct deposits. In addition, the levy and attachment shall not include \$300.00 in the account of the defendant.**

AMOUNT DUE/PRINCIPAL: \$3,601.90  
INTEREST from 09/30/2005 at an interest  
rate of 6% per year  
ATTY'S COMM: \$  
DATE: 02/02/2007

PROTHONOTARY'S COSTS PAID: \$40.00  
SHERIFF: \$

OTHER COSTS: \$



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William A. Shaw  
Prothonotary/Clerk Civil Division

Received this writ this 2 day  
of FEB A.D. 2007  
At 3:00 A.M. P.M.

Chet A. Hamer  
Sheriff Key Master Hamer

Requesting Party: Wolpoff & Abramson, LLP  
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**

Target National Bank f/k/a Retailers  
National Bank t/a Target Visa

Vs.

NO.: 2006-00359-CD

Adam C. Galaher

First Commonwealth Bank  
Garnishee

**TO THE SHERIFF OF CLEARFIELD COUNTY:**

To satisfy the debt, interest and costs due TARGET NATIONAL BANK, f/k/a Retailers National Bank t/a Target Visa Plaintiff(s) from ADAM C. GALAHER, Defendant(s):

- (1) You are directed to levy upon the property of the defendant(s) and to sell interest(s) therein:  
Personal Property
- (2) You are also directed to attach the property of the defendant(s) not levied upon in the possession of:  
First Commonwealth 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.
- (4) **If Social Security or Supplemental Income funds are directly deposited into an account of the defendant, the levy and attachment shall not include any funds that may be traced to Social Security direct deposits. In addition, the levy and attachment shall not include \$300.00 in the account of the defendant.**

AMOUNT DUE/PRINCIPAL: \$3,601.90  
INTEREST from 09/30/2005 at an interest  
rate of 6% per year  
ATTY'S COMM: \$  
DATE: 02/02/2007

PROTHONOTARY'S COSTS PAID: \$40.00  
SHERIFF: \$

OTHER COSTS: \$



William A. Shaw  
Prothonotary/Clerk Civil Division

Received this writ this 2 day  
of FEB A.D. 2007  
At 3:00 A.M./P.M.

Chetra A. Hawkins  
Sheriff Chetra A. Hawkins  
Chetra A. Hawkins

Requesting Party: Wolpoff & Abramson, LLP  
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**

Target National Bank f/k/a Retailers  
National Bank t/a Target Visa

Vs.

NO.: 2006-00359-CD

Adam C. Galaher

First Commonwealth Bank  
Garnishee

**TO THE SHERIFF OF CLEARFIELD COUNTY:**

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SHERIFF: \$

OTHER COSTS: \$



\_\_\_\_\_  
William A. Shaw  
Prothonotary/Clerk Civil Division

Received this writ this 2 day  
of FEB A.D. 2007  
At 3:00 A.M. P.M.

Chesler A. Hawley  
Sheriff Marylyn Hamr

Requesting Party: Wolpoff & Abramson, LLP  
4660 Trindle Road, 3rd Floor  
Camp Hill, PA 17011  
(717) 303-6700

**WRIT OF EXECUTION and/or ATTACHMENT  
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National Bank t/a Target Visa

Vs.

NO.: 2006-00359-CD

Adam C. Galaher

First Commonwealth Bank  
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**TO THE SHERIFF OF CLEARFIELD COUNTY:**

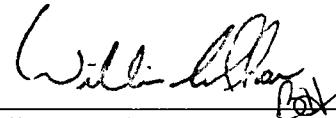
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SHERIFF: \$

OTHER COSTS: \$



William A. Shaw  
Prothonotary/Clerk Civil Division

Received this writ this 2 day  
of FEB A.D. 2007  
At 3:00 A.M./P.M.

Chesler A. Hawkins  
Sheriff Marilyn Hamer

Requesting Party: Wolpoff & Abramson, LLP  
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**

Target National Bank f/k/a Retailers  
National Bank t/a Target Visa

Vs.

NO.: 2006-00359-CD

Adam C. Galaher

First Commonwealth Bank  
Garnishee

**TO THE SHERIFF OF CLEARFIELD COUNTY:**

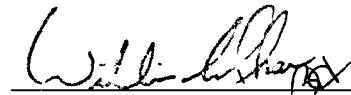
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\_\_\_\_\_  
William A. Shaw  
Prothonotary/Clerk Civil Division

Received this writ this 2 day  
of FEB A.D. 2007  
At 3:00 A.M./P.M.

Clara A. Hawley  
Sheriff by Marilyn Harr

Requesting Party: Wolpoff & Abramson, LLP  
4660 Trindle Road, 3rd Floor  
Camp Hill, PA 17011  
(717) 303-6700

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

TARGET NATIONAL BANK : NO. 06359CD  
FKA RETAILERS NATIONAL BANK

Plaintiff :

vs. :

ADAM C GALAHER :

130 LITTLE SPIKE RD  
OSCEOLA MILLS PA 16666-1638 :

Defendant(s) :

FILED

FEB 15 2007

2007-02-15 (6) (6) William A. Shaw  
Prothonotary/Clerk of Courts

No 4C

ANSWER?

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# XXX-XX-6468

PLAINTIFF'S INTERROGATORIES TO GARNISHEE  
DEFENDANT(S) - ADAM C GALAHER

130 LITTLE SPIKE RD  
OSCEOLA MILLS PA 16666-1638

SS# XXX-XX-6468

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. For all answers to this and the foregoing Interrogatories, see Exhibit "A" attached hereto and made part hereof.

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

Date: 1/30/07

EXHIBIT "A"  
ANSWERS TO INTERROGATORIES

1. No
- a. No
2. No
3. No
4. No
5. No
6. No
7. No
8. No
9. First Commonwealth Bank charges a \$200.00 processing fee.

## VERIFICATION

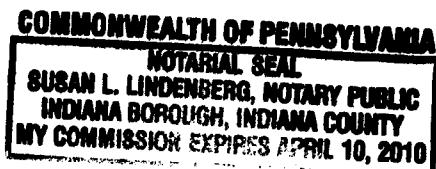
COMMONWEALTH OF PENNSYLVANIA )  
COUNTY OF INDIANA )

On this 9<sup>th</sup> day of February 2007 before me, the undersigned officer, a Notary Public in and for said Commonwealth and County, personally appeared JAMES BOYLE, who being duly sworn according to law, acknowledged that he is Vice President of First Commonwealth Bank, and that the facts set forth in the foregoing Interrogatories are true and correct to the best of his knowledge and belief.

James Boyle, Vice President  
First Commonwealth Bank

Sworn and subscribed to before me  
This 9<sup>th</sup> day of February 2007

Susan L Lindenbag  
Notary Public



IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

TARGET NATIONAL BANK

Plaintiff

NO. 06359CD

vs.

CIVIL ACTION – LAW

ADAM C GALAHER  
Defendant

**PRAECIPE TO DISCONTINUE ATTACHMENT EXECUTION**

To the Prothonotary:

Kindly mark the attachment against the Garnishee, First Commonwealth Bank, discontinued,  
upon payment of your costs only.

Respectfully Submitted,



Dated: 3/11/07

Amy F. Doyle #87062  
Daniel F. Wolfson #20617  
Philip C. Warholic #86341  
David R. Galloway #87326  
Tonilyn M. Chippie #87852  
Sarah E. Ehasz #86469  
Robert N. Polas, Jr. #201259  
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., Suite 300  
Camp Hill, PA 17011  
(717) 303-6700

W&A File No. 143590383

cc: ADAM C GALAHER  
1000 APPALACHIN DR  
FAYETTEVILLE, NC 28311

FILED 3cc to Atty  
m/3:45pm 1cc debt  
MAR 12 2007  
William A. Shaw  
Prothonotary/Clerk of Courts