

06-481-CD

Jerjis Alajaji vs Robert Claypool

Jerjis Alajaji vs Robert Claypool  
2006-481-CD

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

JERJIS T. ALAJAJI,

Plaintiff,

Docket No 2006-481-CD

vs.

ROBERT JOHN CLAYPOOL, a/k/a ROBERT J.  
CLAYPOOL, JOHN CLAYPOOL, ROBERT  
CLAYPOOL, JR., ROBERT J. CLAYPOOL, SR.,  
ROBERT I. CLAYPOOL, ROBERT JON  
CLAYPOOL,

Type of Pleading  
*Complaint*

Defendant.

Filed on Behalf of Plaintiff  
*Jerjis T. Alajaji*

Counsel of Record for This Party  
*Darryl R. Slimak, Esquire*  
Pa. Supreme Court I.D. #41695

McQuaide, Blasko, Fleming &  
Faulkner, Inc.  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

Counsel for Adverse Party

FILED

MAR 29 2006

001-12-401-000

William A. Shaw

Prothonotary/Clerk of Courts

3 CENTS TO ATTY

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

JERJIS T. ALAJAJI,

Plaintiff, : Docket No:

vs.

ROBERT JOHN CLAYPOOL, a/k/a ROBERT J. :  
CLAYPOOL, JOHN CLAYPOOL, ROBERT :  
CLAYPOOL, JR., ROBERT J. CLAYPOOL, SR., :  
ROBERT I. CLAYPOOL, ROBERT JON :  
CLAYPOOL,

Defendant.

NOTICE TO DEFEND

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint is served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Court Administrator  
Clearfield County Courthouse  
230 East Market Street  
Clearfield, PA 16830  
(814) 765-2641 ext. 5982

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

By: 

Darryl R. Slimak  
Attorneys for Plaintiff  
811 University Drive  
State College, PA 16801  
(814) 238-4926

Dated: March 26, 2006

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

JERJIS T. ALAJAJI, :  
: Plaintiff, : Docket No:  
: :  
: vs. :  
: :  
ROBERT JOHN CLAYPOOL, a/k/a ROBERT J. :  
CLAYPOOL, JOHN CLAYPOOL, ROBERT :  
CLAYPOOL, JR., ROBERT J. CLAYPOOL, SR., :  
ROBERT I. CLAYPOOL, ROBERT JON :  
CLAYPOOL, :  
: Defendant. :  
:

**COMPLAINT**

AND NOW comes Plaintiff, JERJIS T. ALAJAJI, by and through his attorneys,  
McQuaide, Blasko, Fleming & Faulkner, Inc., and files the within Complaint against Defendant:

1. Plaintiff is Jerjis T. Alajaji, an adult individual residing at 25-B Tower Lane, DuBois, Clearfield County, Pennsylvania 15801.
2. Defendant Claypool is an individual also known as Robert John Claypool, Robert J. Claypool, John Claypool, Robert Claypool, Jr., Robert J. Claypool, Sr., Robert I. Claypool, and/or Robert Jon Claypool, believed to currently reside at 30864 Live Oak Drive, Running Springs, California, and whose mailing address is PO Box 445, Running Springs, California 92383-0045.
3. Between March 24, 2004 and November 14, 2005, Plaintiff lent to Defendant a total of \$90,431, as confirmed in three promissory notes signed by Defendant Claypool, dated November 7, 2005, copies of which are attached hereto as Exhibit "A."

4. The referenced promissory notes acknowledge therein that same are made under the jurisdiction of Clearfield County, Pennsylvania, where Jerjis T. Alajaji resides.

5. All legal conditions precedent to repayment have been met and/or are inapplicable as a matter of law, and the full amount loaned is now past due and payable.

6. Plaintiff Alajaji has duly made demand of Defendant Claypool for repayment in full, but no repayment has to date been received.

7. Defendant's failure to repay Plaintiff, despite demand, is not only in breach of the parties' agreement and the promissory notes, but same also constitutes unjust enrichment of Defendant Claypool to the detriment of Plaintiff Alajaji.

WHEREFORE, Plaintiff demands entry of judgment in his favor and against Defendant in the amount of \$90,431, together with an award of interest at the legal rate, plus costs of suit.

Respectfully submitted,

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

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

Darryl R. Slimak  
Attorneys for Plaintiff  
JERJIS T. ALAJAJI  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

Dated: March 26, 2006

Alajaji v. Claypool

**VERIFICATION**

The undersigned verifies that he is authorized to make this verification on his own behalf; and that the statements made in the foregoing **COMPLAINT** are true and correct to the best of his knowledge, information and belief. I understand that false statements herein are subject to the penalties of 18 Pa. C.S.A. §4904, related to unsworn falsification to authority.



---

Jerjis T. Alajaji

# EXHIBIT A

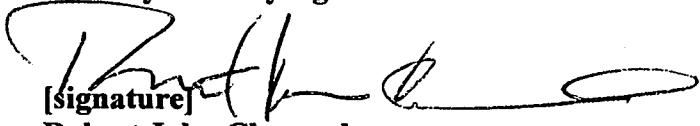
## PROMISSORY NOTE

I, the undersigned, Robert John Claypool, also known as, Father John Claypool who lives at 30864 Live Oak Drive, P.O. Box 445 Running Springs, California 92382-0445. My Social Security Number: 557-94-8197. My Date of Birth: December 27, 1952. I hereby testify that I have borrowed from Dr. Jerjis T. Alajaji, who lives at 25-B Tower Lane Dubois, PA 15801, the sum of \$76,500.00 (seventy six thousand five hundred U.S. dollars). I hereby promise to pay him back in full the whole amount of the loan immediately after the Internal Revenue Service lifts the lien on the house which I inherited from my deceased mother, and as soon as the inherited money is made available to me. This promissory note is made under the jurisdiction of Clearfield County, Pennsylvania where Dr. Jerjis Alajaji resides. I promise to facilitate and speed up the process of accessing my inherited money through the probate process which has been already adjudicated in my favor and through which I inherited half of the value of my mother's house. The amount of money I expect to inherit is \$330,000.00, based on a recent appraisal of the house and based on the equity that my deceased mother already owns, clear of any mortgage or other liens and/or debts. I testify that the disbursement of my inherited money is pending immediate release to me once the IRS has lifted the lien on my mother's house which is expected in a few weeks. A recent trial in court resulted in a verdict in my favor against the IRS, with no monies owed to the IRS.

Each statement above is severable and independently true.

I testify that all the above is true and correct.

I hereby affix my signature below.

  
[signature]  
Robert John Claypool

11-7-2005

Notary

# CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

State of California

County of

*San Bernardino*

On Nov 7, 2005 before me, Lorelei Ann Kreutzer  
Date Robert John Clayton  
personally appeared Robert John Clayton

Name and Title of Officer (e.g., "Jane Doe, Notary Public")

Name(s) of Signer(s)

personally known to me  
 proved to me on the basis of satisfactory evidence

to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies) and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal.

*Lorelei Ann Kreutzer*  
Signature of Notary Public

## OPTIONAL

Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.

### Description of Attached Document

Title or Type of Document: \_\_\_\_\_

Document Date: \_\_\_\_\_ Number of Pages: \_\_\_\_\_

Signer(s) Other Than Named Above: \_\_\_\_\_

### Capacity(ies) Claimed by Signer

Signer's Name: \_\_\_\_\_

Individual  
 Corporate Officer — Title(s): \_\_\_\_\_  
 Partner —  Limited  General  
 Attorney-in-Fact  
 Trustee  
 Guardian or Conservator  
 Other: \_\_\_\_\_

RIGHT THUMBPRINT  
OF SIGNER  
Top of thumb here

Signer Is Representing: \_\_\_\_\_

## PROMISSORY NOTE

I, the undersigned, Robert John Claypool, also known as, Father John Claypool who lives at 30864 Live Oak Drive, P.O. Box 445 Running Springs, California 92382-0445. My Social Security Number : 557-94-8197. My date of Birth: December 27, 1952. I hereby testify that I have borrowed from Dr. Jerjis T. Alajaji, who lives at 25-B Tower Lane Dubois, PA 15801, the sum of \$10,000.00 (ten thousand U.S. dollars). I hereby promise to pay him back in full the whole amount of the loan immediately after the Internal Revenue Service lifts the lien on the house which I inherited from my deceased mother, and as soon as the inherited money is made available to me. This promissory note is made under the jurisdiction of Clearfield County, Pennsylvania where Dr. Jerjis Alajaji resides. I promise to facilitate and speed up the process of accessing my inherited money through the probate process which has been already adjudicated in my favor and through which I inherited half of the value of my mother's house. The amount of money I expect to inherit is \$330,000.00, based on a recent appraisal of the house and based on the equity that my deceased mother already owns, clear of any mortgage or other liens and/or debts. I testify that the disbursement of my inherited money is pending immediate release to me once the IRS has lifted the lien on my mother's house which is expected in a few weeks. A recent trial in court resulted in a verdict in my favor against the IRS, with no monies owed to the IRS.

Each statement above is severable and independently true.

I testify that all the above is true and correct.

I hereby affix my signature below.

 11-7-2005  
[signature]  
Robert John Claypool

Notary

# CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

State of California

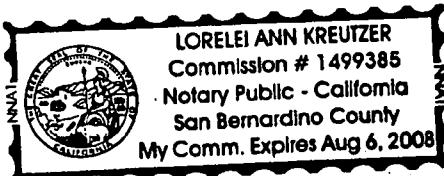
County of San Bernardino

On Nov 7, 2005 before me, Lorelei Ann Kreutzer  
Data Robert John Clapp  
personally appeared Robert John Clapp

Name and title of Officer (e.g., "Jane Doe, Notary Public")

Name(s) of Signer(s)

personally known to me  
 proved to me on the basis of satisfactory evidence



to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in (his/her/their authorized capacity(ies)) and that by (his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal.

Lorelei Ann Kreutzer  
Signature of Notary Public

## OPTIONAL

Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.

### Description of Attached Document

Title or Type of Document: \_\_\_\_\_

Document Date: \_\_\_\_\_ Number of Pages: \_\_\_\_\_

Signer(s) Other Than Named Above: \_\_\_\_\_

### Capacity(ies) Claimed by Signer

Signer's Name: \_\_\_\_\_

Individual  
 Corporate Officer — Title(s): \_\_\_\_\_  
 Partner —  Limited  General  
 Attorney-in-Fact  
 Trustee  
 Guardian or Conservator  
 Other: \_\_\_\_\_

Signer Is Representing: \_\_\_\_\_



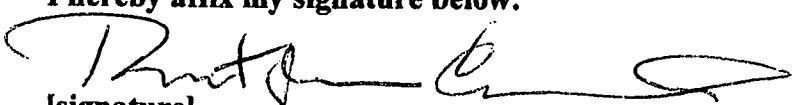
## PROMISSORY NOTE

I, the undersigned, Robert John Claypool, also known as, Father John Claypool who lives at 30864 Live Oak Drive, P.O. Box 445 Running Springs, California 92382-0445. My Social Security Number : 557-94-8197. My date of Birth; December 27, 1952. I hereby testify that I have borrowed from Dr. Jerjis T. Alajaji, who lives at 25-B Tower Lane Dubois, PA 15801, the sum of \$3,931.00 (three thousand nine hundred thirty-one U.S. dollars). I hereby promise to pay him back in full the whole amount of the loan immediately after the Internal Revenue Service lifts the lien on the house which I inherited from my deceased mother, and as soon as the inherited money is made available to me. This promissory note is made under the jurisdiction of Clearfield County, Pennsylvania where Dr. Jerjis Alajaji resides. I promise to facilitate and speed up the process of accessing my inherited money through the probate process which has been already adjudicated in my favor and through which I inherited half of the value of my mother's house. The amount of money I expect to inherit is \$330,000.00, based on a recent appraisal of the house and based on the equity that my deceased mother already owns, clear of any mortgage or other liens and/or debts. I testify that the disbursement of my inherited money is pending immediate release to me once the IRS has lifted the lien on my mother's house which is expected in a few weeks. A recent trial in court resulted in a verdict in my favor against the IRS, with no monies owed to the IRS.

Each statement above is severable and independently true.

I testify that all the above is true and correct.

I hereby affix my signature below.

  
[signature]  
Robert John Claypool

11-7-2005

Notary

# CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

State of California

County of San Bernardino ss.

On Nov 7, 2005

Date

before me, Lorelei Ann Kreutzer

personally appeared Robert John Claypool

Name and Title of Officer (e.g., "Jane Doe, Notary Public")

Name(s) of Signer(s)

personally known to me  
 proved to me on the basis of satisfactory evidence

to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal.

Lorelei Ann Kreutzer  
Signature of Notary Public

## OPTIONAL

Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.

### Description of Attached Document

Title or Type of Document: \_\_\_\_\_

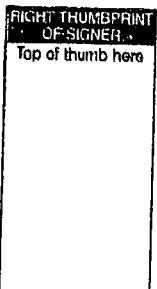
Document Date: \_\_\_\_\_ Number of Pages: \_\_\_\_\_

Signer(s) Other Than Named Above: \_\_\_\_\_

### Capacity(ies) Claimed by Signer

Signer's Name: \_\_\_\_\_

Individual  
 Corporate Officer — Title(s): \_\_\_\_\_  
 Partner —  Limited  General  
 Attorney-in-Fact  
 Trustee  
 Guardian or Conservator  
 Other: \_\_\_\_\_



Signer Is Representing: \_\_\_\_\_

Nov 29 2006  
FILED

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

JERJIS T. ALAJAJI,

Plaintiff, : Docket No. 2006 - 481 - C.D.

vs. :

ROBERT JOHN CLAYPOOL, a/k/a ROBERT J. :  
CLAYPOOL, JOHN CLAYPOOL, ROBERT : Type of Pleading  
CLAYPOOL, JR., ROBERT J. CLAYPOOL, SR., : *Return of Service*  
ROBERT I. CLAYPOOL, ROBERT JON :  
CLAYPOOL, :

Defendant. :

Filed on Behalf of Plaintiff  
*Jerjis T. Alajaji*

Counsel of Record for This Party  
*Darryl R. Slimak, Esquire*  
Pa. Supreme Court I.D. #41695

McQuaide, Blasko, Fleming &  
Faulkner, Inc.  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

Counsel for Adverse Party  
*None*

FILED NO cc  
M 10:57 AM JUN 07 2006 GK

William A. Shaw  
Prothonotary/Clerk of Courts

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

JERJIS T. ALAJAJI, :  
: Plaintiff, : Docket No: 2006 - 481 - CD  
: :  
vs. :  
: :  
ROBERT JOHN CLAYPOOL, a/k/a ROBERT J. :  
CLAYPOOL, JOHN CLAYPOOL, ROBERT :  
CLAYPOOL, JR., ROBERT J. CLAYPOOL, SR., :  
ROBERT I. CLAYPOOL, ROBERT JON :  
CLAYPOOL, :  
: Defendant. :  
: :  
:

**RETURN OF SERVICE**

The undersigned hereby certifies that pursuant to and consistent with Pa. R.C.P. Nos. 403, 404, and 405, a true and correct copy of the Complaint in the above referenced matter was served on Defendant Claypool via certified mail, signed receipt obtained, at 30864 Live Oak Drive, PO Box 445, Running Springs, California 92383-0045, by the United States Postal Service on April 7, 2006.

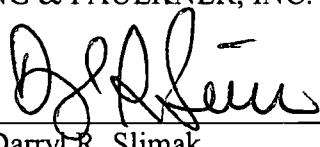
A copy of the U.S. Postal Service Confirmation of Service is attached hereto as Exhibit "A."

Furthermore, it is hereby certified that on May 3, 2006, an additional copy of the Complaint, and the Rule 237.5 "Important Notice" of intent to enter default judgment for failure to file a responsive pleading, was served on Defendant Claypool utilizing the U.S. Postal Service, both by ordinary mail and by certified mail, restricted delivery, signed return receipt requested, which registered mailing was returned by the U.S. Postal Service marked as "refused." A true and correct copy of said "Important Notice" is attached hereto as Exhibit "B." The envelope and

enclosed materials send by certified mail but "refused" by Defendant are attached hereto as  
Exhibit "C."

Respectfully submitted,

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

By: 

Darryl R. Slimak  
Attorneys for Plaintiff  
JERJIS T. ALAJAJI  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

Dated: June 3, 2006

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

JERJIS T. ALAJAJI, :  
Plaintiff, : Docket No: 2006 - 481 - CD  
vs. :  
ROBERT JOHN CLAYPOOL, a/k/a ROBERT J. :  
CLAYPOOL, JOHN CLAYPOOL, ROBERT :  
CLAYPOOL, JR., ROBERT J. CLAYPOOL, SR., :  
ROBERT I. CLAYPOOL, ROBERT JON :  
CLAYPOOL, :  
Defendant. :  
:

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Return of Service in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 5<sup>th</sup> day of June, 2006, to the attorney(s)/parties of record:

Robert Claypool  
30864 Live Oak Drive  
PO Box 445  
Running Springs, CA 92383-0045

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

By: Darryl R. Slimak

Darryl R. Slimak  
Attorneys for Plaintiff  
JERJIS T. ALAJAJI  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624



[Home](#) | [Help](#) | [Sign In](#)[Track & Confirm](#)[FAQs](#)

## Track & Confirm

### Search Results

Label/Receipt Number: 7003 1680 0005 2030 6081

Detailed Results:

- Delivered, April 07, 2006, 1:25 pm, RUNNING SPRINGS, CA 92382
- Notice Left, April 05, 2006, 11:14 am, RUNNING SPRINGS, CA 92382

[\*\*< Back\*\*](#)[Return to USPS.com Home >](#)[\*\*Go >\*\*](#)[Track & Confirm](#)

Enter Label/Receipt Number.

### Notification Options

#### Track & Confirm by email

Get current event information or updates for your item sent to you or others by email.

[\*\*Go >\*\*](#)

17



POSTAL INSPECTORS  
Preserving the Trust

[site map](#) [contact us](#) [government services](#) [jobs](#) [National & Premier Accounts](#)  
Copyright © 1999-2004 USPS. All Rights Reserved. [Terms of Use](#) [Privacy Policy](#)





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

JERJIS T. ALAJAJI,

Plaintiff, : Docket No. 2006 - 481 - C.D.

vs.

ROBERT JOHN CLAYPOOL, a/k/a ROBERT J.  
CLAYPOOL, JOHN CLAYPOOL, ROBERT  
CLAYPOOL, JR., ROBERT J. CLAYPOOL, SR.,  
ROBERT I. CLAYPOOL, ROBERT JON  
CLAYPOOL,

Type of Pleading  
*Notice of Praecepice to Enter  
Judgment by Default*

Defendant.

Filed on Behalf of Plaintiff  
*Jerjis T. Alajaji*

Counsel of Record for This Party  
*Darryl R. Slimak, Esquire*  
Pa. Supreme Court I.D. #41695

McQuaide, Blasko, Fleming &  
Faulkner, Inc.  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

Counsel for Adverse Party

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

JERJIS T. ALAJAJI,

Plaintiff, : Docket No: 2006 - 481 - CD

vs.

ROBERT JOHN CLAYPOOL, a/k/a ROBERT J. :  
CLAYPOOL, JOHN CLAYPOOL, ROBERT :  
CLAYPOOL, JR., ROBERT J. CLAYPOOL, SR., :  
ROBERT I. CLAYPOOL, ROBERT JON :  
CLAYPOOL,

Defendant.

**NOTICE OF PRAECIPE TO ENTER**  
**JUDGMENT BY DEFAULT**

To: ROBERT JOHN CLAYPOOL

Date of Notice: May 3, 2006

**IMPORTANT NOTICE**

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU 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.

Court Administrator  
Centre County Courthouse  
Allegheny Street  
Bellefonte, PA 16823  
(814) 355-6727

Respectfully submitted,

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

By: Darryl R. Slimak

Darryl R. Slimak  
Attorneys for Plaintiff  
JERJIS T. ALAJAJI  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

Dated: May 3, 2006

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

JERJIS T. ALAJAJI,

Plaintiff, : Docket No: 2006 - 481 - CD

vs. :

ROBERT JOHN CLAYPOOL, a/k/a ROBERT J. :  
CLAYPOOL, JOHN CLAYPOOL, ROBERT :  
CLAYPOOL, JR., ROBERT J. CLAYPOOL, SR., :  
ROBERT I. CLAYPOOL, ROBERT JON :  
CLAYPOOL, :

Defendant. :

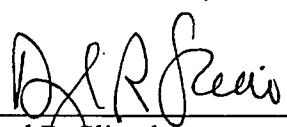
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Notice of Praeclipe for Entry of Default Judgment in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 3<sup>rd</sup> day of May, 2006, to the Defendant:

Robert John Claypool  
30864 Live Oak Drive  
PO Box 445  
Running Springs, CA 92383-0045

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

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

  
Darryl R. Slimak  
Attorneys for Plaintiff  
JERJIS T. ALAJAJI  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624



**CERTIFIED MAIL**



7160 3901 9842 9783 8243  
**RETURN RECEIPT REQUESTED**

RETURN RECEIPT REQUESTED

## **FIRST CLASS MAIL**

RECORDED  
RETURN RECEIPT

RECEIVED

MCQUAID BLASKO

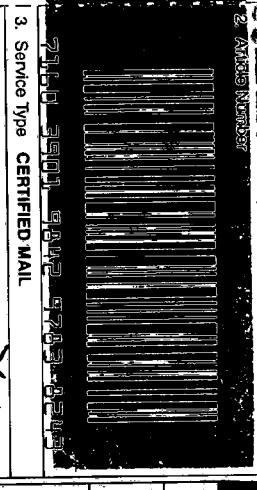
RETURN POSTAGE GUARANTEED

**McQUAIDE BLASKO**  
ATTORNEYS AT LAW  
811 UNIVERSITY DRIVE  
STATE COLLEGE, PENNSYLVANIA

Mr ROBERT JOHN CLAYPOOL  
30864 LIVE OAK DRIVE  
PO BOX 445  
RUNNING SPRINGS CA 92375

# FIRST CLASS MAIL

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF RETURN ADDRESS FOLD AT DOTTED LINE

COMPLETE THIS SECTION ON DELIVERY	
2. Article Number	
	
A. Received by (Please Print Clearly)	B. Date of Delivery
<input type="checkbox"/> Agent <input type="checkbox"/> Addressee	
C. Signature	
<input checked="" type="checkbox"/> Yes	
D. Is delivery address different from item 1? If YES, enter delivery address below:	<input type="checkbox"/> Yes <input type="checkbox"/> No
1. Article Addressed to: LINE 1 •	
ROBERT JOHN CLARKPOOL 30854 ELEVE OAK DRIVE PO BOX 445 RUMMING SPRINGS CA 92388-0045	
<b>RECEIVED</b> (Initials)	
Domestic Return Receipt	
<b>Thank you for using Return Receipt Service</b>	
FOLD AND TEAR HERE	

**Columbian®**

ITEM NO. C0805

DuPont™  
**Tyvek®**



Protect What's Inside.™



# MCQUAIDE BLASKO

ATTORNEYS AT LAW

811 University Drive, State College, Pennsylvania 16801-6699  
Additional offices in Hershey and Hollidaysburg

(814) 238-4926

FAX (814) 234-5620  
[www.mqblaw.com](http://www.mqblaw.com)

May 3, 2006

Robert John Claypool  
30864 Live Oak Drive  
PO Box 445  
Running Springs, CA 92383-0045

In re: Jerjis T. Alajaji vs. Robert John Claypool  
Docket No: 2006 - 481 - C.D. (Centre County, Pennsylvania)

Dear Mr. Claypool:

Enclosed herewith is an Important Notice regarding the above referenced lawsuit. I also enclose an additional copy of the Complaint for your ease of reference.

Very truly yours,

MCQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

By:

  
Darryl R. Slimak

DRS/kb  
Enclosures  
cc: Jerjis T. Alajaji w/enc - P&C

## MCQUAIDE, BLASKO, FLEMING & FAULKNER, INC.

State College Office: John W. Blasko R. Mark Faulkner David M. Weixel Steven S. Hurvitz James M. Horne Wendell V. Courtney Darryl R. Slimak Mark Righter Daniel E. Bright Paul J. Tomeczuk Janine C. Gismondi John A. Snyder April C. Simpson Allen P. Neely Pamela A. Ruest Katherine V. Oliver Katherine M. Allen Wayne L. Mowery, Jr. Chena L. Glenn-Hart Livinia N. Jones Cristin R. Long Matthew T. Rogers Frederick R. Battaglia Anthony A. Simon

Hershey Office: Grant H. Fleming Maureen A. Gallagher Michael J. Mohr Jonathan B. Stepanian Britt D. Russell

Hollidaysburg Office: Thomas M. Reese J. Benjamin Yeager Sean M. Burke Michael P. Routh

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

JERJIS T. ALAJAJI, :  
Plaintiff, : Docket No. 2006 - 481 - C.D.  
vs. :  
ROBERT JOHN CLAYPOOL, a/k/a ROBERT J. :  
CLAYPOOL, JOHN CLAYPOOL, ROBERT : Type of Pleading  
CLAYPOOL, JR., ROBERT J. CLAYPOOL, SR., : *Notice of Praecept to Enter*  
ROBERT I. CLAYPOOL, ROBERT JON : *Judgment by Default*  
CLAYPOOL, :  
Defendant. :  
: Filed on Behalf of Plaintiff  
: *Jerjis T. Alajaji*  
: Counsel of Record for This Party  
: *Darryl R. Slimak, Esquire*  
: Pa. Supreme Court I.D. #41695  
: :  
: McQuaide, Blasko, Fleming &  
: Faulkner, Inc.  
: 811 University Drive  
: State College, PA 16801  
: (814) 238-4926  
: Fax: (814) 238-9624  
: :  
: Counsel for Adverse Party  
: :

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

JERJIS T. ALAJAJI,

Plaintiff, : Docket No: 2006 - 481 - CD

vs. :

ROBERT JOHN CLAYPOOL, a/k/a ROBERT J. :  
CLAYPOOL, JOHN CLAYPOOL, ROBERT :  
CLAYPOOL, JR., ROBERT J. CLAYPOOL, SR., :  
ROBERT I. CLAYPOOL, ROBERT JON :  
CLAYPOOL, :

Defendant. :

**NOTICE OF PRAECIPE TO ENTER**  
**JUDGMENT BY DEFAULT**

To: ROBERT JOHN CLAYPOOL

Date of Notice: May 3, 2006

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU 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.

Court Administrator  
Centre County Courthouse  
Allegheny Street  
Bellefonte, PA 16823  
(814) 355-6727

Respectfully submitted,

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

By: 

Darryl R. Slimak  
Attorneys for Plaintiff  
JERJIS T. ALAJAJI  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

Dated: May 3, 2006

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

JERJIS T. ALAJAJI,

Plaintiff, : Docket No: 2006 - 481 - CD

vs. :

ROBERT JOHN CLAYPOOL, a/k/a ROBERT J. :  
CLAYPOOL, JOHN CLAYPOOL, ROBERT :  
CLAYPOOL, JR., ROBERT J. CLAYPOOL, SR., :  
ROBERT I. CLAYPOOL, ROBERT JON :  
CLAYPOOL, :

Defendant. :

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Notice of Praeclipe for Entry of Default Judgment in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 3<sup>rd</sup> day of May, 2006, to the Defendant:

Robert John Claypool  
30864 Live Oak Drive  
PO Box 445  
Running Springs, CA 92383-0045

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

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

  
Darryl R. Slimak

Attorneys for Plaintiff  
JERJIS T. ALAJAJI  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

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

JERJIS T. ALAJAJI,

Plaintiff,

Docket No 2006-481-C0

vs.

ROBERT JOHN CLAYPOOL, a/k/a ROBERT J.  
CLAYPOOL, JOHN CLAYPOOL, ROBERT  
CLAYPOOL, JR., ROBERT J. CLAYPOOL, SR.,  
ROBERT I. CLAYPOOL, ROBERT JON  
CLAYPOOL,

Type of Pleading  
*Complaint*

Defendant.

Filed on Behalf of Plaintiff  
*Jerjis T. Alajaji*

Counsel of Record for This Party  
*Darryl R. Slimak, Esquire*  
Pa. Supreme Court I.D. #41695

McQuaide, Blasko, Fleming &  
Faulkner, Inc.  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

Counsel for Adverse Party

I hereby certify this to be a true  
and attested copy of the original  
statement filed in this case.

MAR 29 2006

Attest.

*Willa L. Brown*  
Prothonotary/  
Clerk of Courts

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

JERJIS T. ALAJAJI,

Plaintiff, : Docket No:

vs. :

ROBERT JOHN CLAYPOOL, a/k/a ROBERT J. :  
CLAYPOOL, JOHN CLAYPOOL, ROBERT :  
CLAYPOOL, JR., ROBERT J. CLAYPOOL, SR., :  
ROBERT I. CLAYPOOL, ROBERT JON :  
CLAYPOOL, :

Defendant. :

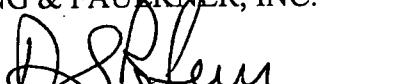
NOTICE TO DEFEND

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint is served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Court Administrator  
Clearfield County Courthouse  
230 East Market Street  
Clearfield, PA 16830  
(814) 765-2641 ext. 5982

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

By: 

Darryl R. Slimak  
Attorneys for Plaintiff  
811 University Drive  
State College, PA 16801  
(814) 238-4926

Dated: March 26, 2006

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

JERJIS T. ALAJAJI,

Plaintiff, : Docket No:

vs. :

ROBERT JOHN CLAYPOOL, a/k/a ROBERT J. :  
CLAYPOOL, JOHN CLAYPOOL, ROBERT :  
CLAYPOOL, JR., ROBERT J. CLAYPOOL, SR., :  
ROBERT I. CLAYPOOL, ROBERT JON :  
CLAYPOOL, :

Defendant. :

**COMPLAINT**

AND NOW comes Plaintiff, JERJIS T. ALAJAJI, by and through his attorneys, McQuaide, Blasko, Fleming & Faulkner, Inc., and files the within Complaint against Defendant:

1. Plaintiff is Jerjis T. Alajaji, an adult individual residing at 25-B Tower Lane, DuBois, Clearfield County, Pennsylvania 15801.
2. Defendant Claypool is an individual also known as Robert John Claypool, Robert J. Claypool, John Claypool, Robert Claypool, Jr., Robert J. Claypool, Sr., Robert I. Claypool, and/or Robert Jon Claypool, believed to currently reside at 30864 Live Oak Drive, Running Springs, California, and whose mailing address is PO Box 445, Running Springs, California 92383-0045.
3. Between March 24, 2004 and November 14, 2005, Plaintiff lent to Defendant a total of \$90,431, as confirmed in three promissory notes signed by Defendant Claypool, dated November 7, 2005, copies of which are attached hereto as Exhibit "A."

4. The referenced promissory notes acknowledge therein that same are made under the jurisdiction of Clearfield County, Pennsylvania, where Jerjis T. Alajaji resides.

5. All legal conditions precedent to repayment have been met and/or are inapplicable as a matter of law, and the full amount loaned is now past due and payable.

6. Plaintiff Alajaji has duly made demand of Defendant Claypool for repayment in full, but no repayment has to date been received.

7. Defendant's failure to repay Plaintiff, despite demand, is not only in breach of the parties' agreement and the promissory notes, but same also constitutes unjust enrichment of Defendant Claypool to the detriment of Plaintiff Alajaji.

WHEREFORE, Plaintiff demands entry of judgment in his favor and against Defendant in the amount of \$90,431, together with an award of interest at the legal rate, plus costs of suit.

Respectfully submitted,

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

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

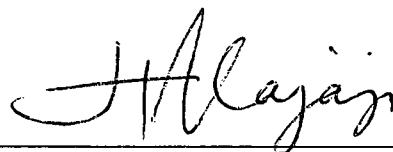
Darryl R. Slimak  
Attorneys for Plaintiff  
JERJIS T. ALAJAJI  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

Dated: March 26, 2006

Alajaji v. Claypool

**VERIFICATION**

The undersigned verifies that he is authorized to make this verification on his own behalf; and that the statements made in the foregoing **COMPLAINT** are true and correct to the best of his knowledge, information and belief. I understand that false statements herein are subject to the penalties of 18 Pa. C.S.A. §4904, related to unsworn falsification to authority.



---

Jerjis T. Alajaji

**EXHIBIT A**

## PROMISSORY NOTE

I, the undersigned, Robert John Claypool, also known as, Father John Claypool who lives at 30864 Live Oak Drive, P.O. Box 445 Running Springs, California 92382-0445. My Social Security Number: 557-94-8197. My Date of Birth: December 27, 1952. I hereby testify that I have borrowed from Dr. Jerjis T. Alajaji, who lives at 25-B Tower Lane Dubois, PA 15801, the sum of \$76,500.00 (seventy six thousand five hundred U.S. dollars). I hereby promise to pay him back in full the whole amount of the loan immediately after the Internal Revenue Service lifts the lien on the house which I inherited from my deceased mother, and as soon as the inherited money is made available to me. This promissory note is made under the jurisdiction of Clearfield County, Pennsylvania where Dr. Jerjis Alajaji resides. I promise to facilitate and speed up the process of accessing my inherited money through the probate process which has been already adjudicated in my favor and through which I inherited half of the value of my mother's house. The amount of money I expect to inherit is \$330,000.00, based on a recent appraisal of the house and based on the equity that my deceased mother already owns, clear of any mortgage or other liens and/or debts. I testify that the disbursement of my inherited money is pending immediate release to me once the IRS has lifted the lien on my mother's house which is expected in a few weeks. A recent trial in court resulted in a verdict in my favor against the IRS, with no monies owed to the IRS.

Each statement above is severable and independently true.

I testify that all the above is true and correct.

I hereby affix my signature below.

[signature]  
Robert John Claypool

11-7-2005

Notary

# CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

State of California

County of

*San Bernardino*  
Ss.

On Nov 7, 2005 before me,

Date

personally appeared

Name and Title of Officer (e.g., "Jane Doe, Notary Public")

Name(s) of Signer(s)

personally known to me  
 proved to me on the basis of satisfactory evidence

to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal.

*Lorelei Ann Kreutzer*  
Signature of Notary Public



## OPTIONAL

Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.

### Description of Attached Document

Title or Type of Document: \_\_\_\_\_

Document Date: \_\_\_\_\_ Number of Pages: \_\_\_\_\_

Signer(s) Other Than Named Above: \_\_\_\_\_

### Capacity(ies) Claimed by Signer

Signer's Name: \_\_\_\_\_

Individual  
 Corporate Officer — Title(s): \_\_\_\_\_  
 Partner —  Limited  General  
 Attorney-in-Fact  
 Trustee  
 Guardian or Conservator  
 Other: \_\_\_\_\_

RIGHT THUMBSPRINT  
OF SIGNER:

Top of thumb here

Signer Is Representing: \_\_\_\_\_

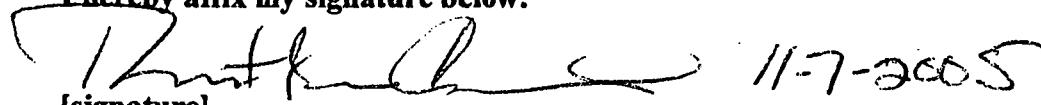
## PROMISSORY NOTE

I, the undersigned, Robert John Claypool, also known as, Father John Claypool who lives at 30864 Live Oak Drive, P.O. Box 445 Running Springs, California 92382-0445. My Social Security Number : 557-94-8197. My date of Birth: December 27, 1952. I hereby testify that I have borrowed from Dr. Jerjis T. Alajaji, who lives at 25-B Tower Lane Dubois, PA 15801, the sum of \$10,000.00 (ten thousand U.S. dollars). I hereby promise to pay him back in full the whole amount of the loan immediately after the Internal Revenue Service lifts the lien on the house which I inherited from my deceased mother, and as soon as the inherited money is made available to me. This promissory note is made under the jurisdiction of Clearfield County, Pennsylvania where Dr. Jerjis Alajaji resides. I promise to facilitate and speed up the process of accessing my inherited money through the probate process which has been already adjudicated in my favor and through which I inherited half of the value of my mother's house. The amount of money I expect to inherit is \$330,000.00, based on a recent appraisal of the house and based on the equity that my deceased mother already owns, clear of any mortgage or other liens and/or debts. I testify that the disbursement of my inherited money is pending immediate release to me once the IRS has lifted the lien on my mother's house which is expected in a few weeks. A recent trial in court resulted in a verdict in my favor against the IRS, with no monies owed to the IRS.

Each statement above is severable and independently true.

I testify that all the above is true and correct.

I hereby affix my signature below.

  
[signature]  
Robert John Claypool

Notary

# CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

State of California

County of San Bernardino

On Nov 7, 2005

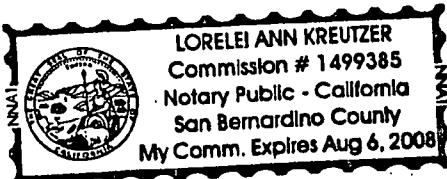
Date

personally appeared Robert John Clapp

Name and Title of Officer (e.g., "Jane Doe, Notary Public")

Name(s) of Signer(s)

personally known to me  
 proved to me on the basis of satisfactory evidence



to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal.

Lorelei Ann Kreutzer  
Signature of Notary Public

## OPTIONAL

Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.

### Description of Attached Document

Title or Type of Document: \_\_\_\_\_

Document Date: \_\_\_\_\_ Number of Pages: \_\_\_\_\_

Signer(s) Other Than Named Above: \_\_\_\_\_

### Capacity(ies) Claimed by Signer

Signer's Name: \_\_\_\_\_

Individual  
 Corporate Officer — Title(s): \_\_\_\_\_  
 Partner —  Limited  General  
 Attorney-in-Fact  
 Trustee  
 Guardian or Conservator  
 Other: \_\_\_\_\_



Signer Is Representing: \_\_\_\_\_

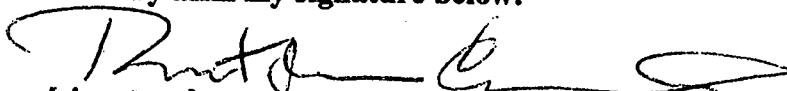
## PROMISSORY NOTE

I, the undersigned, Robert John Claypool, also known as, Father John Claypool who lives at 30864 Live Oak Drive, P.O. Box 445 Running Springs, California 92382-0445. My Social Security Number : 557-94-8197. My date of Birth: December 27, 1952. I hereby testify that I have borrowed from Dr. Jerjis T. Alajaji, who lives at 25-B Tower Lane Dubois, PA 15801, the sum of \$3,931.00 (three thousand nine hundred thirty-one U.S. dollars). I hereby promise to pay him back in full the whole amount of the loan immediately after the Internal Revenue Service lifts the lien on the house which I inherited from my deceased mother, and as soon as the inherited money is made available to me. This promissory note is made under the jurisdiction of Clearfield County, Pennsylvania where Dr. Jerjis Alajaji resides. I promise to facilitate and speed up the process of accessing my inherited money through the probate process which has been already adjudicated in my favor and through which I inherited half of the value of my mother's house. The amount of money I expect to inherit is \$330,000.00, based on a recent appraisal of the house and based on the equity that my deceased mother already owns, clear of any mortgage or other liens and/or debts. I testify that the disbursement of my inherited money is pending immediate release to me once the IRS has lifted the lien on my mother's house which is expected in a few weeks. A recent trial in court resulted in a verdict in my favor against the IRS, with no monies owed to the IRS.

Each statement above is severable and independently true.

I testify that all the above is true and correct.

I hereby affix my signature below.

  
[signature] 11-7-2005  
Robert John Claypool

Notary

# CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

State of California

County of San Bernardino

On Nov 7, 2005 before me, Lorelei Ann Kreutzer

Date

personally appeared Robert John Clayton

Name and Title of Officer (e.g., "Jane Doe, Notary Public")

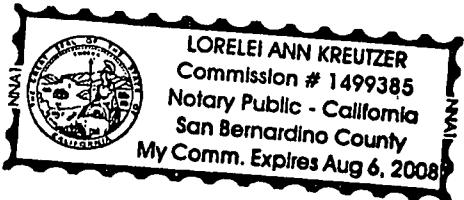
Name(s) of Signer(s)

personally known to me

proved to me on the basis of satisfactory evidence

to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal.



## OPTIONAL

Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.

### Description of Attached Document

Title or Type of Document: \_\_\_\_\_

Document Date: \_\_\_\_\_ Number of Pages: \_\_\_\_\_

Signer(s) Other Than Named Above: \_\_\_\_\_

### Capacity(ies) Claimed by Signer

Signer's Name: \_\_\_\_\_

- Individual
- Corporate Officer — Title(s): \_\_\_\_\_
- Partner —  Limited  General
- Attorney-in-Fact
- Trustee
- Guardian or Conservator
- Other: \_\_\_\_\_

RIGHT THUMBSPRINT  
OF SIGNER:  
Top of thumb here

Prothonotary  
William Shaw  
Clark of Courts

Signer Is Representing: \_\_\_\_\_

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

JERJIS T. ALAJAJI,

Plaintiff, : Docket No. 2006 - 481 - C.D.

vs. :

ROBERT JOHN CLAYPOOL, a/k/a ROBERT J. :  
CLAYPOOL, JOHN CLAYPOOL, ROBERT : Type of Pleading  
CLAYPOOL, JR., ROBERT J. CLAYPOOL, SR., : *Praeclipe for Entry of Judgment*  
ROBERT I. CLAYPOOL, ROBERT JON : *of Default for Failure to Plead*  
CLAYPOOL, :  
:

Defendant. :

Filed on Behalf of Plaintiff  
*Jerjis T. Alajaji*

Counsel of Record for This Party  
*Darryl R. Slimak, Esquire*  
Pa. Supreme Court I.D. #41695

McQuaide, Blasko, Fleming &  
Faulkner, Inc.  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

Counsel for Adverse Party  
*None*

FILED 1CC & Notice  
m 3:01 PM to Def.  
JUN 07 2006 Statements 1CC  
Atty JF to Atty JF  
William A. Shal Prothonotary/Clerk of Courts  
Atty pd. 20.00

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

JERJIS T. ALAJAJI, :  
Plaintiff, : Docket No: 2006 - 481 - CD  
vs. :  
ROBERT JOHN CLAYPOOL, a/k/a ROBERT J. :  
CLAYPOOL, JOHN CLAYPOOL, ROBERT :  
CLAYPOOL, JR., ROBERT J. CLAYPOOL, SR., :  
ROBERT I. CLAYPOOL, ROBERT JON :  
CLAYPOOL, :  
Defendant. :  
:

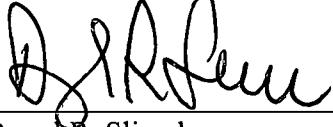
**PRAECIPE FOR ENTRY OF JUDGMENT OF**  
**DEFAULT FOR FAILURE TO PLEAD**

TO THE PROTHONOTARY:

Pursuant to Pa. R.C.P. 237.1, please enter judgment in favor of the Plaintiff Jerjis T. Alajaji, and against the Defendant Robert John Claypool, a/k/a Robert J. Claypool, John Claypool, Robert Claypool, Jr., Robert J. Claypool, Sr., Robert I. Claypool, Robert Jon Claypool, jointly and severally, in the amount of Ninety Thousand Four Hundred Thirty-One Dollars and No Cents (\$90,431.00) as set forth in the Complaint.

The undersigned hereby certifies that on the 5<sup>th</sup> day of May, 2006, written Notice of Intent to file the instant Praecipe was mailed to Defendant(s) at his last known address at which the Complaint was previously served. A true and correct copy of all said documents and Certificate of Service thereto are attached hereto as Exhibit "A." More than ten (10) days have elapsed since the service of the Important Notice on Defendant(s), and no responsive pleading has been filed to date.

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

By: 

Darryl R. Slimak  
Attorneys for Plaintiff  
JERJIS T. ALAJAJI  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

Dated: June 5, 2006

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

JERJIS T. ALAJAJI,

Plaintiff, : Docket No: 2006 - 481 - CD

vs. :

ROBERT JOHN CLAYPOOL, a/k/a ROBERT J. :  
CLAYPOOL, JOHN CLAYPOOL, ROBERT :  
CLAYPOOL, JR., ROBERT J. CLAYPOOL, SR., :  
ROBERT I. CLAYPOOL, ROBERT JON :  
CLAYPOOL, :

Defendant. :

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Praecept for Entry of Judgment for Failure to Plead, in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 5<sup>th</sup> day of June, 2006, to the Defendant:

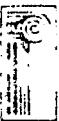
Robert John Claypool  
30864 Live Oak Drive  
PO Box 445  
Running Springs, CA 92383-0045

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

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

  
Darryl R. Slimak  
Attorneys for Plaintiff  
JERJIS T. ALAJAJI  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624





# MCQUAIDE BLASKO

ATTORNEYS AT LAW

811 University Drive, State College, Pennsylvania 16801-6699  
Additional offices in Hershey and Hollidaysburg

(814) 238-4926

FAX (814) 234-5620  
[www.mqblaw.com](http://www.mqblaw.com)

May 3, 2006

Robert John Claypool  
30864 Live Oak Drive  
PO Box 445  
Running Springs, CA 92383-0045

In re: Jerjis T. Alajaji vs. Robert John Claypool  
Docket No: 2006 - 481 - C.D. (Centre County, Pennsylvania)

Dear Mr. Claypool:

Enclosed herewith is an Important Notice regarding the above referenced lawsuit. I also enclose an additional copy of the Complaint for your ease of reference.

Very truly yours,

MCQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

By:

  
Darryl R. Slimak

DRS/klb  
Enclosures  
cc: Jerjis T. Alajaji w/enc - P&C

## MCQUAIDE, BLASKO, FLEMING & FAULKNER, INC.

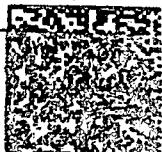
State College Office: John W. Blasko R. Mark Faulkner David M. Weixel Steven S. Hurvitz James M. Horne Wendell V. Courtney Darryl R. Slimak Mark Righter Daniel E. Bright Paul J. Tomczuk Janine C. Gismondi John A. Snyder April C. Simpson Allen P. Neely Pamela A. Ruest Katherine V. Oliver Katherine M. Allen Wayne L. Mowery, Jr. Chena L. Glenn-Hart Livinia N. Jones Cristin R. Long Matthew T. Rogers Frederick R. Battaglia Anthony A. Simon

Hershey Office: Grant H. Fleming Maureen A. Gallagher Michael J. Mohr Jonathan B. Stepanian Britt D. Russell

Hollidaysburg Office: Thomas M. Reese J. Benjamin Yeager Sean M. Burke Michael P. Routh

# FIRST CLASS MAIL

7160 3901 9842 9783 8243  
RETURN RECEIPT REQUESTED



UNITED STATES POSTAL SERVICE  
02 1A  
0004622716 MAY 03 20  
MAILED FROM ZIPCODE 168

\$05.11  
HONEY BEARERS

5/5  
6/20

445

RECEIVED  
MAY 2 2000

RECEIVED

MCQUAIDE BLASKO

FROM

McQUAIDE BLASKO  
ATTORNEYS AT LAW  
811 UNIVERSITY DRIVE  
STATE COLLEGE, PENNSYLVANIA 16801

For ROBERT JOHN CLAYPOOL

30864 LIVE OAK DRIVE  
PO BOX 445  
RUNNING SPRINGS CA 92383 0045

RETURN POSTAGE GUARANTEED

# FIRST CLASS MAIL

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
DE REVERSE ADDRESS SIDE OF ENVELOPE

COMPLETE THIS SECTION ON DELIVERY	
A. Received by (Please Print Clearly)	B. Date of Delivery
C. Signature	
	
7160 3901 9842 9783 8243	
3. Service Type	CERTIFIED MAIL
4. Restricted Delivery? (Extra Fee)	<input checked="" type="checkbox"/> Yes
1. Article Addressed to:	
ROBERT JOHN CLAYPOOL 30864 LIVE OAK DRIVE PO BOX 445 RUNNING SPRINGS CA 92383-0045	
DRS. (Alajaji)	
PS Form 3811, January 2005	
Domestic Return Receipt	

Thank you for using Return Receipt Service

FOLD AND TEAR HERE

**Columbian®**

ITEM NO. CO805

DuPont™  
**Tyvek®**  
Protect What's Inside™



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

JERJIS T. ALAJAJI,

Plaintiff, : Docket No. 2006 - 481 - C.D.

vs. :

ROBERT JOHN CLAYPOOL, a/k/a ROBERT J. : Type of Pleading  
CLAYPOOL, JOHN CLAYPOOL, ROBERT : *Notice of Praecept to Enter*  
CLAYPOOL, JR., ROBERT J. CLAYPOOL, SR., : *Judgment by Default*  
ROBERT I. CLAYPOOL, ROBERT JON :  
CLAYPOOL, :

Defendant. :

Filed on Behalf of Plaintiff  
*Jerjis T. Alajaji*

Counsel of Record for This Party  
*Darryl R. Slimak, Esquire*  
Pa. Supreme Court I.D. #41695

McQuaide, Blasko, Fleming &  
Faulkner, Inc.  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

Counsel for Adverse Party

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

JERJIS T. ALAJAJI, :  
: Plaintiff, : Docket No: 2006 - 481 - CD  
: :  
: vs. :  
: :  
ROBERT JOHN CLAYPOOL, a/k/a ROBERT J. :  
CLAYPOOL, JOHN CLAYPOOL, ROBERT :  
CLAYPOOL, JR., ROBERT J. CLAYPOOL, SR., :  
ROBERT I. CLAYPOOL, ROBERT JON :  
CLAYPOOL, :  
: Defendant. :  
: :  
: :

**NOTICE OF PRAECIPE TO ENTER**  
**JUDGMENT BY DEFAULT**

To: ROBERT JOHN CLAYPOOL

Date of Notice: May 3, 2006

**IMPORTANT NOTICE**

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN  
APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE  
COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST  
YOU. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A  
JUDGMENT MAY BE ENTERED AGAINST YOU 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.

Court Administrator  
Centre County Courthouse  
Allegheny Street  
Bellefonte, PA 16823  
(814) 355-6727

Respectfully submitted,

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

By: Darryl R. Slimak

Darryl R. Slimak  
Attorneys for Plaintiff  
JERJIS T. ALAJAJI  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

Dated: May 3, 2006

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

JERJIS T. ALAJAJI,

Plaintiff, : Docket No: 2006 - 481 - CD

vs. :

ROBERT JOHN CLAYPOOL, a/k/a ROBERT J. :  
CLAYPOOL, JOHN CLAYPOOL, ROBERT :  
CLAYPOOL, JR., ROBERT J. CLAYPOOL, SR., :  
ROBERT I. CLAYPOOL, ROBERT JON :  
CLAYPOOL, :

Defendant. :

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the Notice of Praeclipe for Entry of Default Judgment in the above-captioned matter was mailed by regular mail, postage prepaid, at the Post Office, State College, Pennsylvania, on this 3<sup>rd</sup> day of May, 2006, to the Defendant:

Robert John Claypool  
30864 Live Oak Drive  
PO Box 445  
Running Springs, CA 92383-0045

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

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

  
Darryl R. Slimak  
Attorneys for Plaintiff  
JERJIS T. ALAJAJI  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

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

JERJIS T. ALAJAJI,

Plaintiff, : Docket No 2006-481-CD

vs.

ROBERT JOHN CLAYPOOL, a/k/a ROBERT J. :  
CLAYPOOL, JOHN CLAYPOOL, ROBERT :  
CLAYPOOL, JR., ROBERT J. CLAYPOOL, SR., : Type of Pleading  
ROBERT I. CLAYPOOL, ROBERT JON : *Complaint*  
CLAYPOOL,

Defendant.

Filed on Behalf of Plaintiff  
*Jerjis T. Alajaji*

Counsel of Record for This Party  
*Darryl R. Slimak, Esquire*  
Pa. Supreme Court I.D. #41695

McQuaide, Blasko, Fleming &  
Faulkner, Inc.  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

Counsel for Adverse Party

I hereby certify this to be a true  
and attested copy of the original  
statement filed in this case.

MAR 29 2006

Attest.

*Wm. A. ...*  
Prothonotary/  
Clerk of Courts

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

JERJIS T. ALAJAJI,

Plaintiff, : Docket No:

vs. :

ROBERT JOHN CLAYPOOL, a/k/a ROBERT J. :  
CLAYPOOL, JOHN CLAYPOOL, ROBERT :  
CLAYPOOL, JR., ROBERT J. CLAYPOOL, SR., :  
ROBERT I. CLAYPOOL, ROBERT JON :  
CLAYPOOL, :

Defendant. :

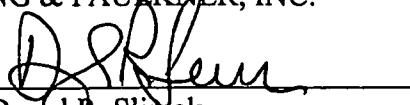
NOTICE TO DEFEND

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint is served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Court Administrator  
Clearfield County Courthouse  
230 East Market Street  
Clearfield, PA 16830  
(814) 765-2641 ext. 5982

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

By: 

Darryl R. Slimak  
Attorneys for Plaintiff  
811 University Drive  
State College, PA 16801  
(814) 238-4926

Dated: March 26, 2006

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

JERJIS T. ALAJAJI,

Plaintiff, : Docket No:

vs.

ROBERT JOHN CLAYPOOL, a/k/a ROBERT J.  
CLAYPOOL, JOHN CLAYPOOL, ROBERT  
CLAYPOOL, JR., ROBERT J. CLAYPOOL, SR.,  
ROBERT I. CLAYPOOL, ROBERT JON  
CLAYPOOL,

Defendant.

COMPLAINT

AND NOW comes Plaintiff, JERJIS T. ALAJAJI, by and through his attorneys,  
McQuaide, Blasko, Fleming & Faulkner, Inc., and files the within Complaint against Defendant:

1. Plaintiff is Jerjis T. Alajaji, an adult individual residing at 25-B Tower Lane, DuBois, Clearfield County, Pennsylvania 15801.
2. Defendant Claypool is an individual also known as Robert John Claypool, Robert J. Claypool, John Claypool, Robert Claypool, Jr., Robert J. Claypool, Sr., Robert I. Claypool, and/or Robert Jon Claypool, believed to currently reside at 30864 Live Oak Drive, Running Springs, California, and whose mailing address is PO Box 445, Running Springs, California 92383-0045.
3. Between March 24, 2004 and November 14, 2005, Plaintiff lent to Defendant a total of \$90,431, as confirmed in three promissory notes signed by Defendant Claypool, dated November 7, 2005, copies of which are attached hereto as Exhibit "A."

4. The referenced promissory notes acknowledge therein that same are made under the jurisdiction of Clearfield County, Pennsylvania, where Jerjis T. Alajaji resides.

5. All legal conditions precedent to repayment have been met and/or are inapplicable as a matter of law, and the full amount loaned is now past due and payable.

6. Plaintiff Alajaji has duly made demand of Defendant Claypool for repayment in full, but no repayment has to date been received.

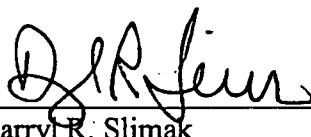
7. Defendant's failure to repay Plaintiff, despite demand, is not only in breach of the parties' agreement and the promissory notes, but same also constitutes unjust enrichment of Defendant Claypool to the detriment of Plaintiff Alajaji.

WHEREFORE, Plaintiff demands entry of judgment in his favor and against Defendant in the amount of \$90,431, together with an award of interest at the legal rate, plus costs of suit.

Respectfully submitted,

McQUAIDE, BLASKO,  
FLEMING & FAULKNER, INC.

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

  
Darryl R. Slimak  
Attorneys for Plaintiff  
JERJIS T. ALAJAJI  
811 University Drive  
State College, PA 16801  
(814) 238-4926  
Fax: (814) 238-9624

Dated: March 26, 2006

*Alajaji v. Claypool*

**VERIFICATION**

The undersigned verifies that he is authorized to make this verification on his own behalf; and that the statements made in the foregoing **COMPLAINT** are true and correct to the best of his knowledge, information and belief. I understand that false statements herein are subject to the penalties of 18 Pa. C.S.A. §4904, related to unsworn falsification to authority.

  
\_\_\_\_\_  
Jerjis T. Alajaji

**EXHIBIT A**

## PROMISSORY NOTE

I, the undersigned, Robert John Claypool, also known as, Father John Claypool who lives at 30864 Live Oak Drive, P.O. Box 445 Running Springs, California 92382-0445. My Social Security Number: 557-94-8197. My Date of Birth: December 27, 1952. I hereby testify that I have borrowed from Dr. Jerjis T. Alajaji, who lives at 25-B Tower Lane Dubois, PA 15801, the sum of \$76,500.00 (seventy six thousand five hundred U.S. dollars). I hereby promise to pay him back in full the whole amount of the loan immediately after the Internal Revenue Service lifts the lien on the house which I inherited from my deceased mother, and as soon as the inherited money is made available to me. This promissory note is made under the jurisdiction of Clearfield County, Pennsylvania where Dr. Jerjis Alajaji resides. I promise to facilitate and speed up the process of accessing my inherited money through the probate process which has been already adjudicated in my favor and through which I inherited half of the value of my mother's house. The amount of money I expect to inherit is \$330,000.00, based on a recent appraisal of the house and based on the equity that my deceased mother already owns, clear of any mortgage or other liens and/or debts. I testify that the disbursement of my inherited money is pending immediate release to me once the IRS has lifted the lien on my mother's house which is expected in a few weeks. A recent trial in court resulted in a verdict in my favor against the IRS, with no monies owed to the IRS.

Each statement above is severable and independently true.

I testify that all the above is true and correct.

I hereby affix my signature below.

[signature]  
Robert John Claypool

11-7-2005

Notary

# CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

State of California

County of

*San Bernardino* ss.

On Dec 7, 2005 before me,

Date

personally appeared

*Robert John Clayton*

Name and Title of Officer (e.g. "Jane Doe, Notary Public")

Name(s) of Signer(s)

personally known to me

proved to me on the basis of satisfactory evidence

to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal.

*Lorelei Ann Kreutzer*  
Signature of Notary Public

## OPTIONAL

Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.

### Description of Attached Document

Title or Type of Document: \_\_\_\_\_

Document Date: \_\_\_\_\_ Number of Pages: \_\_\_\_\_

Signer(s) Other Than Named Above: \_\_\_\_\_

### Capacity(ies) Claimed by Signer

Signer's Name: \_\_\_\_\_

- Individual
- Corporate Officer — Title(s): \_\_\_\_\_
- Partner —  Limited  General
- Attorney-in-Fact
- Trustee
- Guardian or Conservator
- Other: \_\_\_\_\_

RIGHT THUMBSPRINT  
OF SIGNER: \_\_\_\_\_  
Top of thumb here

Signer Is Representing: \_\_\_\_\_

## PROMISSORY NOTE

I, the undersigned, Robert John Claypool, also known as, Father John Claypool who lives at 30864 Live Oak Drive, P.O. Box 445 Running Springs, California 92382-0445. My Social Security Number : 557-94-8197. My date of Birth: December 27, 1952. I hereby testify that I have borrowed from Dr. Jerjis T. Alajaji, who lives at 25-B Tower Lane Dubois, PA 15801, the sum of \$10,000.00 (ten thousand U.S. dollars). I hereby promise to pay him back in full the whole amount of the loan immediately after the Internal Revenue Service lifts the lien on the house which I inherited from my deceased mother, and as soon as the inherited money is made available to me. This promissory note is made under the jurisdiction of Clearfield County, Pennsylvania where Dr. Jerjis Alajaji resides. I promise to facilitate and speed up the process of accessing my inherited money through the probate process which has been already adjudicated in my favor and through which I inherited half of the value of my mother's house. The amount of money I expect to inherit is \$330,000.00, based on a recent appraisal of the house and based on the equity that my deceased mother already owns, clear of any mortgage or other liens and/or debts. I testify that the disbursement of my inherited money is pending immediate release to me once the IRS has lifted the lien on my mother's house which is expected in a few weeks. A recent trial in court resulted in a verdict in my favor against the IRS, with no monies owed to the IRS.

Each statement above is severable and independently true.

I testify that all the above is true and correct.

I hereby affix my signature below.

 11-7-2005

[signature]

Robert John Claypool

Notary

# CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

State of California

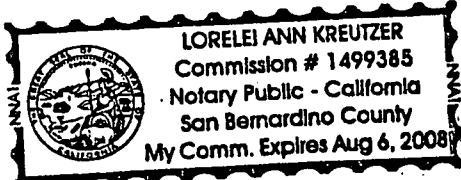
County of

*San Bernardino* ss.

On Nov 7, 2005 before me, Lorelei Ann Kreutzer  
Date Robert John Claffey  
Name and Title of Officer (e.g., "Jane Doe, Notary Public")  
personally appeared Robert John Claffey

Name(s) of Signer(s)

personally known to me  
 proved to me on the basis of satisfactory  
evidence



to be the person(s) whose name(s) is/are  
subscribed to the within instrument and  
acknowledged to me that he/she/they executed  
the same in his/her/their authorized  
capacity(ies), and that by his/her/their  
signature(s) on the instrument the person(s), or  
the entity upon behalf of which the person(s)  
acted, executed the instrument.

WITNESS my hand and official seal.

*Lorelei Ann Kreutzer*  
Signature of Notary Public

## OPTIONAL

Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent  
fraudulent removal and reattachment of this form to another document.

### Description of Attached Document

Title or Type of Document: \_\_\_\_\_

Document Date: \_\_\_\_\_ Number of Pages: \_\_\_\_\_

Signer(s) Other Than Named Above: \_\_\_\_\_

### Capacity(ies) Claimed by Signer

Signer's Name: \_\_\_\_\_

Individual  
 Corporate Officer — Title(s): \_\_\_\_\_  
 Partner —  Limited  General  
 Attorney-in-Fact  
 Trustee  
 Guardian or Conservator  
 Other: \_\_\_\_\_

RIGHT THUMBNAIL  
OF SIGNER:  
Top of thumb here

Signer Is Representing: \_\_\_\_\_

## PROMISSORY NOTE

I, the undersigned, Robert John Claypool, also known as, Father John Claypool who lives at 30864 Live Oak Drive, P.O. Box 445 Running Springs, California 92382-0445. My Social Security Number : 557-94-8197. My date of Birth: December 27, 1952. I hereby testify that I have borrowed from Dr. Jerjis T. Alajaji, who lives at 25-B Tower Lane Dubois, PA 15801, the sum of \$3,931.00 (three thousand nine hundred thirty-one U.S. dollars). I hereby promise to pay him back in full the whole amount of the loan immediately after the Internal Revenue Service lifts the lien on the house which I inherited from my deceased mother, and as soon as the inherited money is made available to me. This promissory note is made under the jurisdiction of Clearfield County, Pennsylvania where Dr. Jerjis Alajaji resides. I promise to facilitate and speed up the process of accessing my inherited money through the probate process which has been already adjudicated in my favor and through which I inherited half of the value of my mother's house. The amount of money I expect to inherit is \$330,000.00, based on a recent appraisal of the house and based on the equity that my deceased mother already owns, clear of any mortgage or other liens and/or debts. I testify that the disbursement of my inherited money is pending immediate release to me once the IRS has lifted the lien on my mother's house which is expected in a few weeks. A recent trial in court resulted in a verdict in my favor against the IRS, with no monies owed to the IRS.

Each statement above is severable and independently true.

I testify that all the above is true and correct.

I hereby affix my signature below.

  
[signature] 11-7-2005  
Robert John Claypool

Notary



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

JERJIS T. ALAJAJI,

Plaintiff, : Docket No: 2006 - 481 - CD

vs. :

ROBERT JOHN CLAYPOOL, a/k/a ROBERT J. :  
CLAYPOOL, JOHN CLAYPOOL, ROBERT :  
CLAYPOOL, JR., ROBERT J. CLAYPOOL, SR., :  
ROBERT I. CLAYPOOL, ROBERT JON :  
CLAYPOOL, :

Defendant. :

**ENTRY OF JUDGMENT**

AND NOW, this 7<sup>th</sup> day of June, 2006, judgment is hereby entered in favor of Plaintiff JERJIS T. ALAJAJI, and against Defendant ROBERT JOHN CLAYPOOL, a/k/a ROBERT J. CLAYPOOL, JOHN CLAYPOOL, ROBERT CLAYPOOL, JR., ROBERT J. CLAYPOOL, SR., ROBERT I. CLAYPOOL, ROBERT JON CLAYPOOL, jointly and severally, in the amount of Ninety Thousand Four Hundred Thirty-one Dollars and No Cents (\$90,431.00).



---

Prothonotary

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

CC  
Jerjis T. Alajaji  
Plaintiff(s)

No.: 2006-00481-CD

Real Debt: \$90,431.00

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

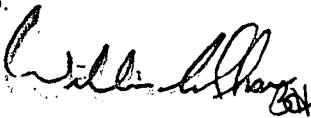
Robert John Claypool, a/k/a Robert J. Claypool, Entry: \$20.00  
John Claypool, Robert Claypool Jr.,  
Robert J. Claypool Sr., Robert I. Claypool,  
Robert Jon Claypool  
Defendant(s)

Instrument: Default Judgment

Date of Entry: June 7, 2006

Expires: June 7, 2011

Certified from the record this 7th day of June, 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