

**Christ the King vs Patrick Gallagher**  
**2006-1004-CD**

**06-1004-CD**  
**Christ the King Manor vs P. Gallagher**

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: **CLEARFIELD**

Mag. Dist. No.: **46-3-01**  
MDJ Name: Hon.  
**PATRICK N. FORD**  
Address: **309 MAPLE AVENUE**  
**PO BOX 452**  
**DUBOIS, PA**  
Telephone: **(814) 371-5321 15801**

**PATRICK N. FORD**  
**309 MAPLE AVENUE**  
**PO BOX 452**  
**DUBOIS, PA 15801**

**NOTICE OF JUDGMENT/TRANSCRIPT  
CIVIL CASE**

PLAINTIFF: **CHRIST THE KING MANOR**  
P.O. BOX 448  
DUBOIS, PA 15801

VS.  
DEFENDANT: **GALLAGHER, PATRICK**  
29 PONDEROSA DRIVE  
PENFIELD, PA 15849

Docket No.: **CV-0000055-06**  
Date Filed: **2/02/06**



*06-1004-CD*

THIS IS TO NOTIFY YOU THAT:  
Judgment:

**DEFAULT JUDGMENT PLTF**

- ☒ Judgment was entered for: (Name) **CHRIST THE KING MANOR, R**  
☒ Judgment was entered against: (Name) **GALLAGHER, PATRICK**

in the amount of \$ **5,740.68** on: (Date of Judgment) **3/06/06**

☐ 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 \$ \_\_\_\_\_

**FILED**  
*m 19:23 AM*  
**JUN 26 2006**  
*ccg notice to Def.*  
*William A. Shaw*  
Prothonotary/Clerk of Courts  
*to Amy*

Amount of Judgment	\$ <b>5,617.18</b>
Judgment Costs	\$ <b>123.50</b>
Interest on Judgment	\$ <b>.00</b>
Attorney Fees	\$ <b>.00</b>
Total	\$ <b>5,740.68</b>
Post Judgment Credits	\$ _____
Post Judgment Costs	\$ _____
Certified Judgment Total	\$ _____

ANY PARTY HAS THE RIGHT TO APPEAL WITHIN 30 DAYS AFTER THE ENTRY OF JUDGMENT BY FILING A NOTICE OF APPEAL WITH THE PROTHONOTARY/CLERK OF THE COURT OF COMMON PLEAS, CIVIL DIVISION. YOU MUST INCLUDE A COPY OF THIS NOTICE OF JUDGMENT/TRANSCRIPT FORM WITH YOUR NOTICE OF APPEAL.

EXCEPT AS OTHERWISE PROVIDED IN THE RULES OF CIVIL PROCEDURE FOR MAGISTERIAL DISTRICT JUDGES, IF THE JUDGMENT HOLDER ELECTS TO ENTER THE JUDGMENT IN THE COURT OF COMMON PLEAS, ALL FURTHER PROCESS MUST COME FROM THE COURT OF COMMON PLEAS AND NO FURTHER PROCESS MAY BE ISSUED BY THE MAGISTERIAL DISTRICT JUDGE.

UNLESS THE JUDGMENT IS ENTERED IN THE COURT OF COMMON PLEAS, ANYONE INTERESTED IN THE JUDGMENT MAY FILE A REQUEST FOR ENTRY OF SATISFACTION WITH THE MAGISTERIAL DISTRICT JUDGE IF THE JUDGMENT DEBTOR PAYS IN FULL, SETTLES, OR OTHERWISE COMPLIES WITH THE JUDGMENT.

*3-6-06* Date *Patrick N. Ford-PNF*, Magisterial District Judge

I certify that this is a true and correct copy of the record of the proceedings containing the judgment.  
*6-22-06* Date *Patrick N. Ford*, Magisterial District Judge

My commission expires first Monday of January, **2012**.

SEAL

NOTICE OF JUDGMENT

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

CIVIL DIVISION

Christ the King Manor

Vs.

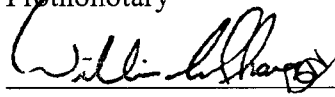
No. 2006-01004-CD

Patrick Gallagher

To: DEFENDANT(S)

NOTICE is given that a JUDGMENT in the above captioned matter has been entered against you in the amount of \$5,740.68 on June 26, 2006.

William A. Shaw  
Prothonotary

  
\_\_\_\_\_  
William A. Shaw



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

Christ the King Manor  
Plaintiff(s)

No.: 2006-01004-CD

Real Debt: \$5,740.68

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Patrick Gallagher  
Defendant(s)

Entry: \$20.00

Instrument: DJ Judgment

Date of Entry: June 26, 2006

Expires: June 26, 2011

Certified from the record this 26th 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

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION – LAW

**CHRIST THE KING MANOR,**  
Plaintiff

v.

**PATRICK GALLAGHER,**  
Defendant

NO. 1004 of 2006 C.D.

Type of Pleading:  
**INTERROGATORIES IN  
ATTACHMENT TO NATIONAL  
CITY BANK**

Filed on behalf of: Plaintiff,  
Christ the King Manor

Counsel of Record for this Party:  
**ROSS F. FERRARO, ESQUIRE**  
Supreme Court No.: 79218

FERRARO, KRUK & FERRARO, LLP  
690 Main Street  
Brockway, PA 15824  
Ph: (814) 268-2202  
Fax: (814) 265-8740

**FILED** *icc-shff*  
*m 11:38 AM*  
JUL 11 2006 *icc Atty*

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
ELK COUNTY BRANCH  
CIVIL ACTION – LAW

CHRIST THE KING MANOR,  
Plaintiff

v.

PATRICK GALLAGHER,  
Defendant

:  
:  
:  
:  
:  
:  
:  
:

No. 1004 of 2006 C.D.

**INTERROGATORIES IN ATTACHMENT TO NATIONAL CITY BANK**

TO: NATIONAL CITY BANK – Garnishee

**IMPORTANT NOTICES 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 entities) against whom the Writ of Execution issued.

(C) "You" means the Main Office and all Branch Offices of National City Bank.

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

### **INTERROGATORIES IN ATTACHMENT**

1. At the time you were served, or at any subsequent time, did you owe the Defendant any money or were you liable to him on any negotiable or other written instrument, or did he claim you owed him any money or were liable to him for any reason?

2. At the time you were served, or any subsequent time, was there in your possession, custody or control or in the joint possession, custody or control of yourself and one (1) or more other persons any funds or property of any nature owned solely or in part by the Defendant? State the names of any bank accounts, certificates of deposit, retirement accounts, investments, trusts, or any other holdings at your institution, including the balance being held therein.

3. At the time you were served, or at any subsequent time, did you hold legal title to any funds or property of any nature owed solely or in part by the Defendant or in which the Defendant held or claimed any interest or title? State the names of any bank accounts, certificates of deposit, retirement accounts, trusts, investments, or any other items at your institution, including the balance being held therein.

4. At the time you were served, or at any subsequent time, did you hold as a fiduciary any funds or property in which the Defendant had an interest? State the names on any bank accounts, certificates of deposit, trusts, retirement accounts, investments, or any other holdings at your institution, including the balance being held which is under the name of the **PATRICK GALLAGHER** individually, (or any accounts or funds held in joint names with Defendant, Patrick Gallagher).

5. At any time before or after you were served, did the Defendant transfer or deliver any property or funds to you or to any person or place pursuant to your direction or consent and, if so, what was the consideration there for?

6. At any time after your were served, did you pay, transfer or deliver any money or property to the Defendant or to any person or place pursuant their direction or otherwise discharge any claim of the Defendant against you or other parties?



7. At the time you were served with the Writ of Execution or at any subsequent time, did you have any safe deposit boxes, pledges, documents of title, securities, notes, coupons, receivables, collateral, checking, savings, tax, or other accounts or deposits in which the Defendant has an interest?

8. At the time you were served with the Writ of Execution or at any subsequent time, did you hold any Treasury Bill, Repurchase Agreement or any other type of investment or commercial paper in which the Defendant has any interest?

9. At the time you were served with the Writ of Execution, or at any subsequent time, did you have property of the Defendant or property in which he has any interest on deposit or otherwise in your possession, custody or control other than that property indicated in your answers to the previous Interrogatories?

You are hereby requested to promptly respond to the above Interrogatories, and failure to do so will result in judgment and execution efforts against **NATIONAL CITY BANK**, as Garnishee, upon Default or Admission in answer to these Interrogatories, pursuant to the Pennsylvania Rules of Civil Procedure Rule 3146. Your answers should be sent to:

**FERRARO, KRUK & FERRARO, LLP**

**ATTN: Ross F. Ferraro, Esquire**

**690 Main Street**

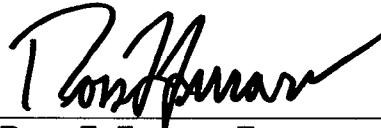
**Brockway, PA, 15824**

FERRARO, KRUK & FERRARO, LLP

Date: \_\_\_\_\_

7/10/06

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



Ross F. Ferraro, Esq.  
Attorney for Plaintiff

**VERIFICATION OF ANSWERS TO INTERROGATORIES IN ATTACHMENT TO**  
**NATIONAL CITY BANK**

I, \_\_\_\_\_, under penalty of perjury and subject to the penalties of 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities, verify that the foregoing answers to Interrogatories in Attachment to NATIONAL CITY BANK, are true and correct to the best of my knowledge, information and belief.

Date: \_\_\_\_\_

\_\_\_\_\_  
Signature

Address: \_\_\_\_\_

\_\_\_\_\_

Phone No.: \_\_\_\_\_

\_\_\_\_\_

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION – LAW

**CHRIST THE KING MANOR,**  
Plaintiff

v.

**PATRICK GALLAGHER,**  
Defendant

NO. 1004 of 2006 C.D.

Type of Pleading:  
**INTERROGATORIES IN  
ATTACHMENT TO NORTHWEST  
SAVINGS BANK**

Filed on behalf of: Plaintiff,  
Christ the King Manor

Counsel of Record for this Party:  
**ROSS F. FERRARO, ESQUIRE**  
Supreme Court No.: 79218

FERRARO, KRUK & FERRARO, LLP  
690 Main Street  
Brockway, PA 15824  
Ph: (814) 268-2202  
Fax: (814) 265-8740

**FILED**  
JUL 11 2006  
m 11:38 AM  
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GK  
William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
ELK COUNTY BRANCH  
CIVIL ACTION – LAW

CHRIST THE KING MANOR,  
Plaintiff

v.

PATRICK GALLAGHER,  
Defendant

:  
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:  
:  
:  
:  
:  
:

No. 1004 of 2006 C.D.

**INTERROGATORIES IN ATTACHMENT TO NORTHWEST SAVINGS BANK**

**TO: NORTHWEST SAVINGS BANK – Garnishee**

**IMPORTANT NOTICES 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 entities) against whom the Writ of Execution issued.

(C) "You" means the Main Office and all Branch Offices of Northwest Savings Bank.

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

### **INTERROGATORIES IN ATTACHMENT**

1. At the time you were served, or at any subsequent time, did you owe the Defendant any money or were you liable to him on any negotiable or other written instrument, or did he claim you owed him any money or were liable to him for any reason?

2. At the time you were served, or any subsequent time, was there in your possession, custody or control or in the joint possession, custody or control of yourself and one (1) or more other persons any funds or property of any nature owned solely or in part by the Defendant? State the names of any bank accounts, certificates of deposit, retirement accounts, investments, trusts, or any other holdings at your institution, including the balance being held therein.

3. At the time you were served, or at any subsequent time, did you hold legal title to any funds or property of any nature owed solely or in part by the Defendant or in which the Defendant held or claimed any interest or title? State the names of any bank accounts, certificates of deposit, retirement accounts, trusts, investments, or any other items at your institution, including the balance being held therein.

4. At the time you were served, or at any subsequent time, did you hold as a fiduciary any funds or property in which the Defendant had an interest? State the names on any bank accounts, certificates of deposit, trusts, retirement accounts, investments, or any other holdings at your institution, including the balance being held which is under the name of the **PATRICK GALLAGHER** individually, (or any accounts or funds held in joint names with Defendant, Patrick Gallagher).

5. At any time before or after you were served, did the Defendant transfer or deliver any property or funds to you or to any person or place pursuant to your direction or consent and, if so, what was the consideration there for?

6. At any time after your were served, did you pay, transfer or deliver any money or property to the Defendant or to any person or place pursuant their direction or otherwise discharge any claim of the Defendant against you or other parties?

7. At the time you were served with the Writ of Execution or at any subsequent time, did you have any safe deposit boxes, pledges, documents of title, securities, notes, coupons, receivables, collateral, checking, savings, tax, or other accounts or deposits in which the Defendant has an interest?

8. At the time you were served with the Writ of Execution or at any subsequent time, did you hold any Treasury Bill, Repurchase Agreement or any other type of investment or commercial paper in which the Defendant has any interest?

9. At the time you were served with the Writ of Execution, or at any subsequent time, did you have property of the Defendant or property in which he has any interest on deposit or otherwise in your possession, custody or control other than that property indicated in your answers to the previous Interrogatories?



You are hereby requested to promptly respond to the above Interrogatories, and failure to do so will result in judgment and execution efforts against **NORTHWEST SAVINGS BANK**, as Garnishee, upon Default or Admission in answer to these Interrogatories, pursuant to the Pennsylvania Rules of Civil Procedure Rule 3146. Your answers should be sent to:

**FERRARO, KRUK & FERRARO, LLP**

**ATTN: Ross F. Ferraro, Esquire**

**690 Main Street**

**Brockway, PA, 15824**

FERRARO, KRUK & FERRARO, LLP

Date: \_\_\_\_\_

7/10/06

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



Ross F. Ferraro, Esq.  
Attorney for Plaintiff

**VERIFICATION OF ANSWERS TO INTERROGATORIES IN ATTACHMENT TO**  
**NORTHWEST SAVINGS BANK**

I, \_\_\_\_\_, under penalty of perjury and subject to the penalties of 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities, verify that the foregoing answers to Interrogatories in Attachment to NORTHWEST SAVINGS BANK, are true and correct to the best of my knowledge, information and belief.

Date: \_\_\_\_\_

\_\_\_\_\_  
Signature

Address: \_\_\_\_\_

\_\_\_\_\_

Phone No.: \_\_\_\_\_

\_\_\_\_\_

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION – LAW

**CHRIST THE KING MANOR,**  
Plaintiff

v.

**PATRICK GALLAGHER,**  
Defendant

NO. 1004 of 2006 C.D.

Type of Pleading:  
**INTERROGATORIES IN  
ATTACHMENT TO S&T  
BANK**

Filed on behalf of: Plaintiff,  
Christ the King Manor

Counsel of Record for this Party:  
**ROSS F. FERRARO, ESQUIRE**  
Supreme Court No.: 79218

FERRARO, KRUK & FERRARO, LLP  
690 Main Street  
Brockway, PA 15824  
Ph: (814) 268-2202  
Fax: (814) 265-8740

**FILED** *icc shf*  
*m 11:38 AM*  
**JUL 11 2006** *icc Atty*  
William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
ELK COUNTY BRANCH  
CIVIL ACTION – LAW

CHRIST THE KING MANOR,  
Plaintiff

v.

PATRICK GALLAGHER,  
Defendant

No. 1004 of 2006 C.D.

**INTERROGATORIES IN ATTACHMENT TO S&T BANK**

TO: S&T BANK – Garnishee

**IMPORTANT NOTICES 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 entities) against whom the Writ of Execution issued.

(C) “You” means the Main Office and all Branch Offices of S&T Bank.

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

### **INTERROGATORIES IN ATTACHMENT**

1. At the time you were served, or at any subsequent time, did you owe the Defendant any money or were you liable to him on any negotiable or other written instrument, or did he claim you owed him any money or were liable to him for any reason?

2. At the time you were served, or any subsequent time, was there in your possession, custody or control or in the joint possession, custody or control of yourself and one (1) or more other persons any funds or property of any nature owned solely or in part by the Defendant? State the names of any bank accounts, certificates of deposit, retirement accounts, investments, trusts, or any other holdings at your institution, including the balance being held therein.

3. At the time you were served, or at any subsequent time, did you hold legal title to any funds or property of any nature owed solely or in part by the Defendant or in which the Defendant held or claimed any interest or title? State the names of any bank accounts, certificates of deposit, retirement accounts, trusts, investments, or any other items at your institution, including the balance being held therein.

4. At the time you were served, or at any subsequent time, did you hold as a fiduciary any funds or property in which the Defendant had an interest? State the names on any bank accounts, certificates of deposit, trusts, retirement accounts, investments, or any other holdings at your institution, including the balance being held which is under the name of the **PATRICK GALLAGHER** individually, (or any accounts or funds held in joint names with Defendant, Patrick Gallagher).

5. At any time before or after you were served, did the Defendant transfer or deliver any property or funds to you or to any person or place pursuant to your direction or consent and, if so, what was the consideration there for?

6. At any time after your were served, did you pay, transfer or deliver any money or property to the Defendant or to any person or place pursuant their direction or otherwise discharge any claim of the Defendant against you or other parties?

7. At the time you were served with the Writ of Execution or at any subsequent time, did you have any safe deposit boxes, pledges, documents of title, securities, notes, coupons, receivables, collateral, checking, savings, tax, or other accounts or deposits in which the Defendant has an interest?

8. At the time you were served with the Writ of Execution or at any subsequent time, did you hold any Treasury Bill, Repurchase Agreement or any other type of investment or commercial paper in which the Defendant has any interest?

9. At the time you were served with the Writ of Execution, or at any subsequent time, did you have property of the Defendant or property in which he has any interest on deposit or otherwise in your possession, custody or control other than that property indicated in your answers to the previous Interrogatories?

You are hereby requested to promptly respond to the above Interrogatories, and failure to do so will result in judgment and execution efforts against **S&T BANK**, as Garnishee, upon Default or Admission in answer to these Interrogatories, pursuant to the Pennsylvania Rules of Civil Procedure Rule 3146. Your answers should be sent to:

**FERRARO, KRUK & FERRARO, LLP**

**ATTN: Ross F. Ferraro, Esquire**

**690 Main Street**

**Brockway, PA, 15824**

FERRARO, KRUK & FERRARO, LLP

Date: 7/10/06

By:   
Ross F. Ferraro, Esq.  
Attorney for Plaintiff



**VERIFICATION OF ANSWERS TO INTERROGATORIES IN ATTACHMENT TO**  
**S&T BANK**

I, \_\_\_\_\_, under penalty of perjury and subject to the penalties of 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities, verify that the foregoing answers to Interrogatories in Attachment to S&T BANK, are true and correct to the best of my knowledge, information and belief.

Date: \_\_\_\_\_

\_\_\_\_\_  
Signature

Address: \_\_\_\_\_

\_\_\_\_\_

Phone No.: \_\_\_\_\_

\_\_\_\_\_

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION – LAW

**CHRIST THE KING MANOR,**  
Plaintiff

v.

**PATRICK GALLAGHER,**  
Defendant

NO. 1004 of 2006 C.D.

Type of Pleading:  
**INTERROGATORIES IN  
ATTACHMENT TO FIRST  
COMMONWEALTH BANK**

Filed on behalf of: Plaintiff,  
Christ the King Manor

Counsel of Record for this Party:  
**ROSS F. FERRARO, ESQUIRE**  
Supreme Court No.: 79218

FERRARO, KRUK & FERRARO, LLP  
690 Main Street  
Brockway, PA 15824  
Ph: (814) 268-2202  
Fax: (814) 265-8740

**FILED** *ICC Shff*  
*MTI:3861*  
**JUL 11 2006** *ICC Amy*  
*@*

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
ELK COUNTY BRANCH  
CIVIL ACTION – LAW

CHRIST THE KING MANOR,  
Plaintiff

v.

PATRICK GALLAGHER,  
Defendant

No. 1004 of 2006 C.D.

**INTERROGATORIES IN ATTACHMENT TO FIRST COMMONWEALTH BANK**

**TO: FIRST COMMONWEALTH BANK – Garnishee**

**IMPORTANT NOTICES 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 entities) against whom the Writ of Execution issued.

(C) "You" means the Main Office and all Branch Offices of First Commonwealth Bank.

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

### **INTERROGATORIES IN ATTACHMENT**

1. At the time you were served, or at any subsequent time, did you owe the Defendant any money or were you liable to him on any negotiable or other written instrument, or did he claim you owed him any money or were liable to him for any reason?

2. At the time you were served, or any subsequent time, was there in your possession, custody or control or in the joint possession, custody or control of yourself and one (1) or more other persons any funds or property of any nature owned solely or in part by the Defendant? State the names of any bank accounts, certificates of deposit, retirement accounts, investments, trusts, or any other holdings at your institution, including the balance being held therein.

3. At the time you were served, or at any subsequent time, did you hold legal title to any funds or property of any nature owed solely or in part by the Defendant or in which the Defendant held or claimed any interest or title? State the names of any bank accounts, certificates of deposit, retirement accounts, trusts, investments, or any other items at your institution, including the balance being held therein.

4. At the time you were served, or at any subsequent time, did you hold as a fiduciary any funds or property in which the Defendant had an interest? State the names on any bank accounts, certificates of deposit, trusts, retirement accounts, investments, or any other holdings at your institution, including the balance being held which is under the name of the **PATRICK GALLAGHER** individually, (or any accounts or funds held in joint names with Defendant, Patrick Gallagher).

5. At any time before or after you were served, did the Defendant transfer or deliver any property or funds to you or to any person or place pursuant to your direction or consent and, if so, what was the consideration there for?

6. At any time after your were served, did you pay, transfer or deliver any money or property to the Defendant or to any person or place pursuant their direction or otherwise discharge any claim of the Defendant against you or other parties?

7. At the time you were served with the Writ of Execution or at any subsequent time, did you have any safe deposit boxes, pledges, documents of title, securities, notes, coupons, receivables, collateral, checking, savings, tax, or other accounts or deposits in which the Defendant has an interest?

8. At the time you were served with the Writ of Execution or at any subsequent time, did you hold any Treasury Bill, Repurchase Agreement or any other type of investment or commercial paper in which the Defendant has any interest?

9. At the time you were served with the Writ of Execution, or at any subsequent time, did you have property of the Defendant or property in which he has any interest on deposit or otherwise in your possession, custody or control other than that property indicated in your answers to the previous Interrogatories?

You are hereby requested to promptly respond to the above Interrogatories, and failure to do so will result in judgment and execution efforts against **FIRST COMMONWEALTH BANK**, as Garnishee, upon Default or Admission in answer to these Interrogatories, pursuant to the Pennsylvania Rules of Civil Procedure Rule 3146. Your answers should be sent to:

**FERRARO, KRUK & FERRARO, LLP**

**ATTN: Ross F. Ferraro, Esquire**

**690 Main Street**

**Brockway, PA, 15824**

FERRARO, KRUK & FERRARO, LLP

Date: \_\_\_\_\_

7/10/06

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



Ross F. Ferraro, Esq.  
Attorney for Plaintiff

**VERIFICATION OF ANSWERS TO INTERROGATORIES IN ATTACHMENT TO**  
**FIRST COMMONWEALTH BANK**

I, \_\_\_\_\_, under penalty of perjury and subject to the penalties of 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities, verify that the foregoing answers to Interrogatories in Attachment to FIRST COMMONWEALTH BANK, are true and correct to the best of my knowledge, information and belief.

Date: \_\_\_\_\_

\_\_\_\_\_  
Signature

Address: \_\_\_\_\_

\_\_\_\_\_

Phone No.: \_\_\_\_\_

\_\_\_\_\_



IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION – LAW

**CHRIST THE KING MANOR,**  
Plaintiff

v.

**PATRICK GALLAGHER,**  
Defendant

NO. 1004 of 2006 C.D.

Type of Pleading:  
**INTERROGATORIES IN  
ATTACHMENT TO COUNTY  
NATIONAL BANK**

Filed on behalf of: Plaintiff,  
Christ the King Manor

Counsel of Record for this Party:  
**ROSS F. FERRARO, ESQUIRE**  
Supreme Court No.: 79218

FERRARO, KRUK & FERRARO, LLP  
690 Main Street  
Brockway, PA 15824  
Ph: (814) 268-2202  
Fax: (814) 265-8740

**FILED** *iccshf*  
*mtt 38761*  
**JUL 11 2006** *icc Atty*  
*CK*

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
ELK COUNTY BRANCH  
CIVIL ACTION – LAW

**CHRIST THE KING MANOR,**  
Plaintiff

v.

**PATRICK GALLAGHER,**  
Defendant

:  
:  
:  
:  
:  
:  
:  
:

No. 1004 of 2006 C.D.

**INTERROGATORIES IN ATTACHMENT TO COUNTY NATIONAL BANK**

**TO: COUNTY NATIONAL BANK – Garnishee**

**IMPORTANT NOTICES 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 entities) against whom the Writ of Execution issued.

(C) "You" means the Main Office and all Branch Offices of County National Bank.

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

### **INTERROGATORIES IN ATTACHMENT**

1. At the time you were served, or at any subsequent time, did you owe the Defendant any money or were you liable to him on any negotiable or other written instrument, or did he claim you owed him any money or were liable to him for any reason?

2. At the time you were served, or any subsequent time, was there in your possession, custody or control or in the joint possession, custody or control of yourself and one (1) or more other persons any funds or property of any nature owned solely or in part by the Defendant? State the names of any bank accounts, certificates of deposit, retirement accounts, investments, trusts, or any other holdings at your institution, including the balance being held therein.

3. At the time you were served, or at any subsequent time, did you hold legal title to any funds or property of any nature owed solely or in part by the Defendant or in which the Defendant held or claimed any interest or title? State the names of any bank accounts, certificates of deposit, retirement accounts, trusts, investments, or any other items at your institution, including the balance being held therein.

4. At the time you were served, or at any subsequent time, did you hold as a fiduciary any funds or property in which the Defendant had an interest? State the names on any bank accounts, certificates of deposit, trusts, retirement accounts, investments, or any other holdings at your institution, including the balance being held which is under the name of the **PATRICK GALLAGHER** individually, (or any accounts or funds held in joint names with Defendant, Patrick Gallagher).

5. At any time before or after you were served, did the Defendant transfer or deliver any property or funds to you or to any person or place pursuant to your direction or consent and, if so, what was the consideration there for?

6. At any time after your were served, did you pay, transfer or deliver any money or property to the Defendant or to any person or place pursuant their direction or otherwise discharge any claim of the Defendant against you or other parties?

7. At the time you were served with the Writ of Execution or at any subsequent time, did you have any safe deposit boxes, pledges, documents of title, securities, notes, coupons, receivables, collateral, checking, savings, tax, or other accounts or deposits in which the Defendant has an interest?

8. At the time you were served with the Writ of Execution or at any subsequent time, did you hold any Treasury Bill, Repurchase Agreement or any other type of investment or commercial paper in which the Defendant has any interest?

9. At the time you were served with the Writ of Execution, or at any subsequent time, did you have property of the Defendant or property in which he has any interest on deposit or otherwise in your possession, custody or control other than that property indicated in your answers to the previous Interrogatories?

You are hereby requested to promptly respond to the above Interrogatories, and failure to do so will result in judgment and execution efforts against **COUNTY NATIONAL BANK**, as Garnishee, upon Default or Admission in answer to these Interrogatories, pursuant to the Pennsylvania Rules of Civil Procedure Rule 3146. Your answers should be sent to:

**FERRARO, KRUK & FERRARO, LLP**

**ATTN: Ross F. Ferraro, Esquire**

**690 Main Street**

**Brockway, PA, 15824**

FERRARO, KRUK & FERRARO, LLP

Date: \_\_\_\_\_

7/10/06

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



Ross F. Ferraro, Esq.  
Attorney for Plaintiff

**VERIFICATION OF ANSWERS TO INTERROGATORIES IN ATTACHMENT TO**  
**COUNTY NATIONAL BANK**

I, \_\_\_\_\_, under penalty of perjury and subject to the penalties of 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities, verify that the foregoing answers to Interrogatories in Attachment to COUNTY NATIONAL BANK, are true and correct to the best of my knowledge, information and belief.

Date: \_\_\_\_\_

\_\_\_\_\_  
Signature

Address: \_\_\_\_\_

\_\_\_\_\_

Phone No.: \_\_\_\_\_

\_\_\_\_\_

Any pd 20.00  
cc to 18  
writs  
to Sheriff  
FILED  
JUL 11 2006

PRAECIPE FOR WRIT OF EXECUTION - (MONEY JUDGMENTS)  
P.R.C.P. 3101 TO 3149

William A. Shaw  
Prothonotary/Clerk of Courts

CHRIST THE KING MANOR,  
Plaintiff

vs.

PATRICK GALLAGHER,  
Defendant

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

No. \_\_\_\_\_ Term \_\_\_\_\_ E.D.

No. 1004 Term 2006 C.D.

PRAECIPE FOR WRIT OF EXECUTION  
(MONEY JUDGEMENT)

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

- (1) Directed to the Sheriff of CLEARFIELD County, Pennsylvania;
- (2) against PATRICK GALLAGHER, Individually, Defendant(s);
- (3) and against County National Bank, First Commonwealth Bank, S&T Bank  
Northwest Savings Bank, National City Bank Garnishee(s);
- (4) and index this writ
- (a) against PATRICK GALLAGHER, Individually Defendant(s) and
- (b) against County National Bank, First Commonwealth Bank, S&T Bank,  
Northwest Savings Bank, National City 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)

Any and all bank accounts, Certificates of Deposit, business or escrow accounts, savings accounts, and any other accounts in the above-mentioned Banks/Garnishees in the name of PATRICK GALLAGHER, individually and jointly.

All furniture, equipment, vehicles, Accounts Receivable, proceeds from any transaction on the sales of real estate or personal property, all office or other equipment and furniture, personal property or any other tangible property.

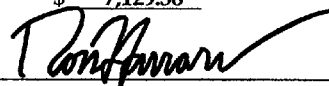
Any and all Stock, Certificates of Ownership Interest, or other property interests in which PATRICK GALLAGHER has an ownership interest in, or with any interest in any entity or company.

Defendant PATRICK GALLAGHER may be found at 29 Ponderosa Drive, Penfield, PA (15849).

Garnishee(s) may be found at: County National Bank, 1 S. 2<sup>nd</sup> Street, Clearfield, PA 16830  
First Commonwealth Bank, 14303 Clearfield Shawville Hwy, Clearfield, PA 16830  
S&T Bank, 614 Liberty Blvd, DuBois, PA 15801  
Northwest Savings Bank, 1200 Old Town Rd, Clearfield, PA 16830  
National City Bank, 200 N Brady St, DuBois, PA 15801

(5) Amount due	\$ 5,740.68	40.00 Prothonotary costs
Attorney's Commission - - - -	\$ 1,000.00	
Interest from 03/06/06 to 07/10/06	\$ 118.90	
Costs to-date	\$ 270.00	
Total	\$ 7,129.58	

Dated 7/10/06

  
Ross F. Ferraro, Esq. Attorney for Plaintiff(s)

NOTE

Under paragraph (1) when the writ is directed to the sheriff of another county as authorized by Rule 3103(b) the county should be indicated.

Under Rule 3103(c) a writ issued on a transferred judgement may be directed only to the sheriff of the county in which issued.

Paragraph (3) above should be completed only if a named garnishee is to be included in the writ.

Paragraph (4) (a) should be completed only if indexing of the execution in the county of issuance, is desired as authorized by Rule 3104(a). When the writ issues to another county indexing is required as of course in that county by the prothonotary. See Rule 3104(b).

Paragraph (4) (b) should be completed only if real property in the name of a garnishee is attached and indexing as a lis pendens is desired. See Rule 3104(c).



No. .... TERM, ..... E.D.  
No. .... 1004 ..... TERM, 2006 C.D.

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY PENNSYLVANIA

CHRIST THE KING MANOR,  
Plaintiff

v/s


PATRICK GALLAGHER,  
Defendant

---

PRAECIPE FOR WRIT OF EXECUTION  
(Money Judgements)  
P.R.C.P. 3101 to 3149 etc.

---

Filed ..... July ..... , ..... 2006

.....  
 ..... Prothonotary  
.....  
Ross F. Ferraro, Esq. Attorney for Plaintiff(s)  
FERRARO, KRUK & FERRARO, LLP  
690 MAIN STREET BROCKWAY, PA 15824  
(814) 268-2202

Address: 29 Ponderosa Drive  
Penfield, PA 15849  
Where papers may be served.

William A. Shaw  
Prothonotary/Clerk of Courts

9002 1 1 7M

9002 1 1 7M

Prothonotary

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

Christ the King Manor

Vs.

NO.: 2006-01004-CD

Patrick Gallagher

County National Bank, First Commonwealth Bank, S&T Bank, Northwest Savings Bank, National City Bank  
Garnishees

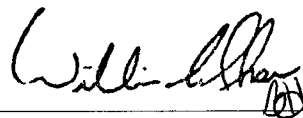
**TO THE SHERIFF OF CLEARFIELD COUNTY:**

To satisfy the debt, interest and costs due CHRIST THE KING MANOR, Plaintiff(s) from PATRICK GALLAGHER, 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:  
County National Bank, First Commonwealth Bank, S&T Bank, Northwest Savings Bank, National City Bank  
Garnishee(s) as follows:  
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 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: \$5,740.68  
INTEREST from 03/06/06 to 07/10/06: \$118.90  
ATTY'S COMM: \$1,000.00  
DATE: 07/11/2006

PROTHONOTARY'S COSTS PAID: \$40.00  
SHERIFF: \$  
COSTS to-date: \$270.00



William A. Shaw  
Prothonotary/Clerk Civil Division

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

\_\_\_\_\_  
Sheriff

Requesting Party: Ross F. Ferraro, Esq.

~~29 Ponderosa Drive~~ 690 Main St.  
~~Penfield, PA 15849~~ Brockway, PA 15824  
(814) 268-2202

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

CHRIST THE KING MANOR,	:	
Plaintiff	:	No. 2006-1004-CD
vs.	:	
	:	
PATRICK GALLAGHER,	:	
Defendant	:	
and	:	
	:	
COUNTY NATIONAL BANK,	:	
Garnishee	:	

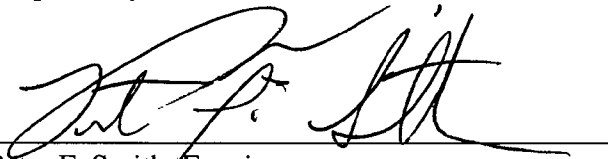
**CERTIFICATE OF SERVICE**

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

U.S. FIRST CLASS MAIL  
Ross F. Ferraro, Esquire  
Ferraro Kruk & Ferraro, LLP  
690 Main Street  
Brockway, PA 15824


CERTIFIED MAIL  
Patrick Gallagher  
1100 W. Long Avenue, Room 525  
DuBois, PA 15801

Respectfully submitted,



Date: July 25, 2006

Peter F. Smith, Esquire  
Attorney for the Garnishee  
Attorney I.D. # 34291  
P.O. Box 130, 30 South Second Street  
Clearfield, PA 16830  
(814) 765-5595

**FILED**  
01/10/39/01  
JUL 28 2006  
WCC  
  
William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION – LAW

**CHRIST THE KING MANOR,**  
Plaintiff

v.

**PATRICK GALLAGHER,**  
Defendant

NO. 1004 of 2006 C.D.

Type of Pleading:  
**INTERROGATORIES IN  
ATTACHMENT TO FIRST  
COMMONWEALTH BANK**

Filed on behalf of: Plaintiff,  
Christ the King Manor

Counsel of Record for this Party:  
**ROSS F. FERRARO, ESQUIRE**  
Supreme Court No.: 79218

FERRARO, KRUK & FERRARO, LLP  
690 Main Street  
Brockway, PA 15824  
Ph: (814) 268-2202  
Fax: (814) 265-8740

**FILED** NO CC  
MIT: 26/6/06  
JUL 28 2006 @

William A. Shaw  
Prothonotary/Clerk of Courts

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

JUL 11 2006

Attest.

*William A. Shaw*  
Prothonotary/  
Clerk of Courts

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
ELK COUNTY BRANCH  
CIVIL ACTION – LAW

CHRIST THE KING MANOR,  
Plaintiff

v.

PATRICK GALLAGHER,  
Defendant

No. 1004 of 2006 C.D.

**INTERROGATORIES IN ATTACHMENT TO FIRST COMMONWEALTH BANK**

**TO: FIRST COMMONWEALTH BANK – Garnishee**

**IMPORTANT NOTICES 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 entities) against whom the Writ of Execution issued.

(C) "You" means the Main Office and all Branch Offices of First Commonwealth Bank.

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

### **INTERROGATORIES IN ATTACHMENT**

1. At the time you were served, or at any subsequent time, did you owe the Defendant any money or were you liable to him on any negotiable or other written instrument, or did he claim you owed him any money or were liable to him for any reason?

For all answers to this and the foregoing interrogatories, see exhibit "A" attached hereto and made part of hereof.

2. At the time you were served, or any subsequent time, was there in your possession, custody or control or in the joint possession, custody or control of yourself and one (1) or more other persons any funds or property of any nature owned solely or in part by the Defendant? State the names of any bank accounts, certificates of deposit, retirement accounts, investments, trusts, or any other holdings at your institution, including the balance being held therein.

3. At the time you were served, or at any subsequent time, did you hold legal title to any funds or property of any nature owed solely or in part by the Defendant or in which the Defendant held or claimed any interest or title? State the names of any bank accounts, certificates of deposit, retirement accounts, trusts, investments, or any other items at your institution, including the balance being held therein.

4. At the time you were served, or at any subsequent time, did you hold as a fiduciary any funds or property in which the Defendant had an interest? State the names on any bank accounts, certificates of deposit, trusts, retirement accounts, investments, or any other holdings at your institution, including the balance being held which is under the name of the **PATRICK GALLAGHER** individually, (or any accounts or funds held in joint names with Defendant, Patrick Gallagher).

5. At any time before or after you were served, did the Defendant transfer or deliver any property or funds to you or to any person or place pursuant to your direction or consent and, if so, what was the consideration there for?

6. At any time after your were served, did you pay, transfer or deliver any money or property to the Defendant or to any person or place pursuant their direction or otherwise discharge any claim of the Defendant against you or other parties?

7. At the time you were served with the Writ of Execution or at any subsequent time, did you have any safe deposit boxes, pledges, documents of title, securities, notes, coupons, receivables, collateral, checking, savings, tax, or other accounts or deposits in which the Defendant has an interest?

8. At the time you were served with the Writ of Execution or at any subsequent time, did you hold any Treasury Bill, Repurchase Agreement or any other type of investment or commercial paper in which the Defendant has any interest?

9. At the time you were served with the Writ of Execution, or at any subsequent time, did you have property of the Defendant or property in which he has any interest on deposit or otherwise in your possession, custody or control other than that property indicated in your answers to the previous Interrogatories?



You are hereby requested to promptly respond to the above Interrogatories, and failure to do so will result in judgment and execution efforts against **FIRST COMMONWEALTH BANK**, as Garnishee, upon Default or Admission in answer to these Interrogatories, pursuant to the Pennsylvania Rules of Civil Procedure Rule 3146. Your answers should be sent to:

**FERRARO, KRUK & FERRARO, LLP**

**ATTN: Ross F. Ferraro, Esquire**

**690 Main Street**

**Brockway, PA, 15824**

FERRARO, KRUK & FERRARO, LLP

Date: \_\_\_\_\_

7/10/06

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



Ross F. Ferraro, Esq.  
Attorney for Plaintiff

**VERIFICATION OF ANSWERS TO INTERROGATORIES IN ATTACHMENT TO**  
**FIRST COMMONWEALTH BANK**

I, \_\_\_\_\_, under penalty of perjury and subject to the penalties of 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities, verify that the foregoing answers to Interrogatories in Attachment to FIRST COMMONWEALTH BANK, are true and correct to the best of my knowledge, information and belief.

Date: \_\_\_\_\_

\_\_\_\_\_  
Signature

Address: \_\_\_\_\_

\_\_\_\_\_

Phone No.: \_\_\_\_\_

\_\_\_\_\_

EXHIBIT "A"  
ANSWERS TO INTERROGATORIES

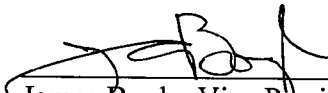
1. No
2. No
3. No
4. No
5. No
6. No
7. No
8. No
9. No

VERIFICATION

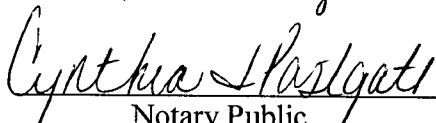
COMMONWEALTH OF PENNSYLVANIA     )

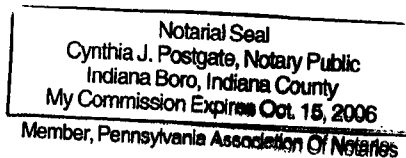
COUNTY OF INDIANA                             )

On this 26 day of July 2006 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 she is  
Assistant Vice President of First Commonwealth Bank, and that the facts set forth in the  
foregoing Interrogatories are true and correct to the best of her knowledge and belief.

  
\_\_\_\_\_  
James Boyle, Vice President  
First Commonwealth Bank

Sworn and subscribed to before me  
This 26 day of July 2006

  
\_\_\_\_\_  
Notary Public



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

Christ the King Manor

Vs.

NO.: 2006-01004-CD

**RECEIVED**  
JUL 24 2006 *AP*

Patrick Gallagher

*29 Ponderosa Drive  
Penfield*

County National Bank, First Commonwealth Bank, S&T Bank, Northwest Savings Bank, National City Bank  
Garnishees

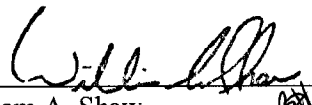
**TO THE SHERIFF OF CLEARFIELD COUNTY:**

To satisfy the debt, interest and costs due CHRIST THE KING MANOR, Plaintiff(s) from PATRICK GALLAGHER, 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:  
County National Bank, First Commonwealth Bank, S&T Bank, Northwest Savings Bank, National City Bank  
Garnishee(s) as follows:  
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 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: \$5,740.68  
INTEREST from 03/06/06 to 07/10/06: \$118.90  
ATTY'S COMM: \$1,000.00  
DATE: 07/11/2006

PROTHONOTARY'S COSTS PAID: \$40.00  
SHERIFF: \$  
COSTS to-date: \$270.00

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

Received this writ this 12<sup>th</sup> day  
of July A.D. 2006  
At 3:00 A.M./P.M.

Requesting Party: Ross F. Ferraro, Esq.

~~29 Ponderosa Drive~~ 690 Main St.  
~~Penfield, PA 15849~~ Brockway, PA 15824  
(814) 268-2202

Chresten A. Houderis  
Sheriff *by Cynthia Butler-Coughenour*

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION – LAW

**CHRIST THE KING MANOR,**  
Plaintiff,

v.

**PATRICK GALLAGHER,**  
Defendant.

NO. 2006–1004–CD

Type of Pleading: **PRAECIPE FOR  
PARTIAL DISCONTINUANCE OF  
LEVY/GARNISHMENT AS TO  
FIRST COMMONWEALTH BANK,  
NORTHWEST SAVINGS BANK,  
NATIONAL CITY BANK AND  
S&T BANK, ONLY**

Filed on behalf of: Plaintiff,  
Christ the King Manor

Counsel of Record for this Party:  
**ROSS F. FERRARO, ESQUIRE**  
Supreme Court No.: 79218

FERRARO, KRUK & FERRARO, LLP  
690 Main Street  
Brockway, PA 15824  
Ph: (814) 268-2202  
Fax: (814) 265-8740

**FILED**

AUG 08 2006

m/10-30/w

William A. Shaw

Prothonotary/Clerk of Courts

2 CENS TO ATTY

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION – LAW

CHRIST THE KING MANOR,  
Plaintiff,

v.

PATRICK GALLAGHER,  
Defendant.

:  
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:  
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:

No. 2006–1004–CD

**PRAECIPE FOR PARTIAL DISCONTINUANCE OF LEVY/GARNISHMENT  
AS TO FIRST COMMONWEALTH BANK, NORTHWEST SAVINGS BANK,  
NATIONAL CITY BANK AND S&T BANK, ONLY**

**TO THE PROTHONOTARY:**

Please mark the above-captioned Execution and Garnishment **partially** Discontinued as to the following Garnishee Banks: First Commonwealth Bank, Northwest Savings Bank, National City Bank and S&T Bank, **ONLY**. This Discontinuance shall only be effective as to the Execution and Garnishment proceedings against these aforementioned Banks. The Judgment and Execution in this matter shall remain of record against all other parties and garnishees/banks in the within matter.

Date: 8-7-06

FERRARO, KRUK & FERRARO, LLP

By:   
Ross F. Ferraro, Esquire  
Attorney for Plaintiffs

**FERRARO, KRUK & FERRARO, LLP**  
ATTORNEYS AT LAW

**R. EDWARD FERRARO  
GREGORY M. KRUK  
ROSS F. FERRARO**

690 MAIN STREET  
BROCKWAY, PENNSYLVANIA 15824

August 7, 2006

Phone: (814) 268-2202  
Fax: (814) 265-8740

William Shaw, Prothonotary  
CLEARFIELD COUNTY COURTHOUSE  
P.O. Box 549  
Clearfield, PA 16830

**In re: Christ the King Manor v. Patrick Gallagher  
No. 2006-1004-CD**

Dear Bill:

Enclosed herein is the **Praecipe for Partial Discontinuance of Levy/Garnishment**, which we ask that you file of record on behalf of our client, Christ the King Manor.

Also enclosed are two (2) additional copies, which we ask that you file stamp as certified, true and correct copies, and return back to our Brockway office in the self-addressed, stamped envelope enclosed.

Please note that this is only a limited Discontinuance as to the listed Garnishee Banks of: **First Commonwealth Bank, Northwest Savings Bank, National City Bank and S&T Bank, ONLY**. All other parties and garnishee Banks, including County National Bank, shall remain record parties to this Judgment and Execution.

Thank you for your attention and assistance. If you have any questions or anything further is needed, please contact me here at our Brockway Office.

Very truly yours,



Ross F. Ferraro

RFF/vam

Enclosures

cc: Mr. Patrick Gallagher  
Mr. Kevin Salandra – Christ the King Manor  
James A. Boyle – First Commonwealth Bank  
Heather Morrison – Northwest Savings Bank  
Vickie Davis – National City Bank  
Wendy Pinchock – S&T Bank

(w/o enclosure)  
(w/o enclosure)  
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(w/o enclosure)



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20389  
NO: 06-1004-CD

PLAINTIFF: CHRIST THE KING MANOR  
vs.  
DEFENDANT: PATRICK GALLAGHER

Execution PERSONAL PROPERTY / INTERROGATORIES

SHERIFF RETURN

DATE RECEIVED WRIT: 7/12/2006

LEVY TAKEN @

POSTED @

SALE HELD

SOLD TO

SOLD FOR AMOUNT PLUS COSTS

WRIT RETURNED 11/9/2011

DATE DEED FILED

PROPERTY ADDRESS 29 PONDEROSA DRIVE PENFIELD , PA 15849

**FILED**  
9/9/25m  
NOV 09 2011  
William A. Shaw  
Prothonotary/Clerk of Courts

SERVICES

SEE ATTACHED SHEET(S) OF SERVICES

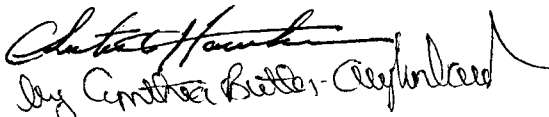
SHERIFF HAWKINS \$180.00

SURCHARGE \$70.00 PAID BY ATTORNEY

Sworn to Before Me This

\_\_\_\_\_ Day of \_\_\_\_\_ 2011

So Answers,

  
Chester A. Hawkins  
Sheriff

**CHRIST THE KING MANOR****VS****PATRICK GALLAGHER**

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1 @ SERVED PATRICK GALLAGHER

DEPUTIES UNABLE TO SERVE OR LEVY PATRICK GALLAGHER, DEFENDANT, AT 29 PONDEROSA DRIVE, PENFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, DEFENDANT IN ELDERLY HOME.

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2 7/21/2006 @ 11:15 AM SERVED COUNTY NATIONAL BANK

SERVED COUNTY NATIONAL BANK, GARNISHEE, AT ONE SOUTH SECOND STREET, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO RUTHANNE RYAN-CATALANO, ASSISTANT VP OF COUNTY NATIONAL A TURE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION AND INTERROGATORIES TO GARNISHEE AND BY MAKING KNOWN TO HER THE CONTENTS THREOF.

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3 7/21/2006 @ 10:55 AM SERVED FIRST COMMONWEALTH BANK

SERVED FIRST COMMONWEALTH BANK, GARNISHEE, AT 14303 CLEARFIELD SHAWVILLE HIGHWAY, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO BRENDA THORNHILL, RECEPT. MANAGEMENT, OF FIRST A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION AND INTERROGATORIES TO GARNISHEE AND BY MAKING KNOWN TO HER THE CONTENTS THEREOF.

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4 7/27/2006 @ 2:10 PM SERVED S&T BANK

SERVED S&T BANK, GARNISHEE, BY HANDING TO DOROTHY MATTERN, VICE PRESIDENT OF S&T BANK, AT HER PLACE OF EMPLOYMENT S&T BANK, 614 LIBERTY BLVD., DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION AND INTERROGATORIES TO GARNISHEE AND BY MAKING KNOWN TO HER THE CONTENTS THEREOF.

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5 7/21/2006 @ 11:10 AM SERVED NORTHWEST SAVINGS BANK

SERVED NORTHWEST SAVINGS BANK, GARNISHEE, AT 1200 OLD TOWN ROAD, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO RENA BREWER, ASSISTANT MANAGER, OF NORTHWEST SAVINGS A TURE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION AND INTERROGATORIES TO GARNISHEE AND BY MAKING KNOWN TO HER THE CONTENTS THEREOF.

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6 7/27/2006 @ 1:55 PM SERVED NATIONAL CITY BANK

SERVED NATIONAL CITY BANK, GARNISHEE, BY HANDING TO PAM FARRELL, MANAGER OF NATIONAL CITY BANK AT HER PLACE OF EMPLOYMENT NATIONAL CITY BANK, 200 N. BRADY STREET, DUBOIS, CLEARFIELD COUNTY, A TRUE AND ATTESTED ORIGINAL WRIT OF ESECUTION AND INTERROGATORIES TO GARNISHEE AND BY MAKING KNOWN TO HER THE CONTENTS THEREOF.

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

Christ the King Manor

Vs.

NO.: 2006-01004-CD

Patrick Gallagher

County National Bank, First Commonwealth Bank, S&T Bank, Northwest Savings Bank, National City Bank  
Garnishees

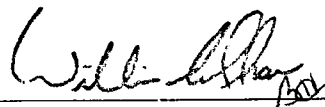
**TO THE SHERIFF OF CLEARFIELD COUNTY:**

To satisfy the debt, interest and costs due CHRIST THE KING MANOR, Plaintiff(s) from PATRICK GALLAGHER, 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:  
County National Bank, First Commonwealth Bank, S&T Bank, Northwest Savings Bank, National City Bank  
Garnishee(s) as follows:  
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 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: \$5,740.68  
INTEREST from 03/06/06 to 07/10/06: \$118.90  
ATTY'S COMM: \$1,000.00  
DATE: 07/11/2006

PROTHONOTARY'S COSTS PAID: \$40.00  
SHERIFF: \$  
COSTS to-date: \$270.00



William A. Shaw  
Prothonotary/Clerk Civil Division

Received this writ this 12<sup>th</sup> day  
of July A.D. 2006  
At 3:00 A.M./P.M.

Chester G. Hankins  
Sheriff By Cynthia Beller-Ayherley

Requesting Party: Ross F. Ferraro, Esq.  
~~29 Ponderosa Drive~~ 69c Main St.  
~~Penfield, PA 15849~~ Broekway, PA 15824  
(814) 268-2202

**PERSONAL PROPERTY SALE  
SCHEDULE OF DISTRIBUTION**

NAME PATRICK GALLAGHER

NO. 06-1004-CD

NOW, November 08, 2011, by virtue of the Writ hereunto attached, after having given due and legal notice of time and place of sale by handbills posted on the premises setting forth the date, time and place of sale, I exposed the within described real estate of Patrick Gallagher to public venue or outcry at which time and place I sold the same to he/she being the highest bidder, for the sum of and made the following appropriations, viz:

**SHERIFF COSTS:**

RDR	9.00
SERVICE	9.00
MILEAGE	14.24
LEVY	
MILEAGE	14.24
POSTING	
HANDBILLS	
COMMISSION	0.00
POSTAGE	1.56
HANDBILLS	
DISTRIBUTION	
ADVERTISING	
ADD'L SERVICE	45.00
ADD'L POSTING	
ADD'L MILEAGE	20.00
ADD'L LEVY	
BID/ SETTLEMENT AMOUNT	
RETURNS/DEPUTIZE	
COPIES	56.96
	5.00
BILLING/PHONE/FAX	5.00
CONTINUED SALES	
MISCELLANEOUS	
<b>TOTAL SHERIFF COSTS</b>	<b>\$180.00</b>

**PLAINTIFF COSTS, DEBT AND INTEREST:**

DEBT-AMOUNT DUE	5,740.68
INTEREST @ %	0.00
FROM TO	
PROTH SATISFACTION	
LATE CHARGES AND FEES	
COST OF SUIT-TO BE ADDED	270.00
FORECLOSURE FEES	
ATTORNEY COMMISSION	1,000.00
REFUND OF ADVANCE	
REFUND OF SURCHARGE	70.00
SATISFACTION FEE	
ESCROW DEFICIENCY	
PROPERTY INSPECTIONS	
INTEREST	118.90
MISCELLANEOUS	
<b>TOTAL DEBT AND INTEREST</b>	<b>\$7,419.58</b>

**COSTS:**

ADVERTISING	0.00
TAXES - COLLECTOR	
TAXES - TAX CLAIM	
DUE	
LIEN SEARCH	
ACKNOWLEDGEMENT	
SHERIFF COSTS	180.00
LEGAL JOURNAL COSTS	0.00
PROTHONOTARY	40.00
MORTGAGE SEARCH	
MUNICIPAL LIEN	

**TOTAL COSTS \$220.00**

**TOTAL COSTS \$7,419.58**

COMMISSION 2% ON THE FIRST \$ 100,000 AND 1/2% ON ALL OVER THAT. DISTRIBUTION WILL BE MADE IN ACCORDANCE WITH THE ABOVE SCHEDULE UNLESS EXCEPTIONS ARE FILED WITH THIS OFFICE **WITHIN TEN (10) DAYS FROM THIS DATE.**

CHESTER A. HAWKINS, Sheriff

## SALES

### Receipts & Disbursements

File 20389

Current balance:

\$0.00

Date	Deposit #	Check #	Vendor	Category	Received	Disbursed
07/03/06	0607031	1657	FERRARO, KRUK & FERRARO	Atty Deposit	\$180.00	
11/08/11		49355	CAROL FOX	Sheriff Fees		\$180.00
					<u>\$180.00</u>	<u>\$180.00</u>