

06-2076-CD

J. Colavecchi vs Tamara M. Gray

Joseph Colavecchi vs Tamara Gray

2006-2076-CD

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

JOSEPH COLAVECCHI, ESQUIRE,
Plaintiff
Vs.

TAMARA MARIE GRAY

Defendant

CIVIL DIVISION

No. 06 - 2076 - CD

COMPLAINT

Filed on Behalf of:

Plaintiff, JOSEPH COLAVECCHI

Counsel of Record for This
Party:

JOSEPH COLAVECCHI, ESQUIRE
Pa. I.D. #06810

COLAVECCHI & COLAVECCHI
221 East Market Street
P.O. Box 131
Clearfield, PA 16830

814/765-1566

LAW OFFICES OF
COLAVECCHI
& COLAVECCHI
221 E. MARKET ST.
(ACROSS FROM
COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA

FILED Atty pd 85.00
03/12/04
DEC 13 2004 2cc Atty
WM
William A. Shaw
Prothonotary/Clerk of Courts

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

JOSEPH COLAVECCHI, ESQUIRE :
Plaintiff:
:
vs. :
: No. 06 - - CD
TAMARA MARIE GRAY, :
Defendant:

N O T I C E

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 and Notice are 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
Second and Market Streets
Clearfield, PA 16830
Phone 814/765-2641 Ex. 5982

LAW OFFICES OF
COLAVECCHI
& COLAVECCHI
221 E. MARKET ST.
(ACROSS FROM
COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA

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

JOSEPH COLAVECCHI, ESQUIRE :
Plaintiff:
:
vs. :
: No. 06 - - CD
TAMARA MARIE GRAY, :
Defendant:

C O M P L A I N T

1. Plaintiff is Joseph Colavecchi, Esquire, an Attorney licensed to practice law in the State of Pennsylvania, having his principal place of business at 221 East Market Street, Clearfield, Pennsylvania, 16830.

2. Defendant is Tamara Marie Gray, an individual, having a mailing address of 831 Treasure Lake, DuBois, Pennsylvania, 15801.

3. Defendant retained the services of Plaintiff to represent her in a divorce action filed in the Court of Common Pleas of Clearfield County, Pennsylvania, to Number 2002-98-CD. This was after a meeting with Defendant on May 31, 2002 and was confirmed by letter dated September 10, 2002 from Plaintiff to Defendant.

4. Plaintiff provided legal services from May 31, 2002 through and including April 4, 2003 at which time a statement was sent to Tamara Marie Gray, a copy of which is in her possession, which resulted in exhausting the initial retainer and leaving a balance due at that time of \$394.04.

5. Plaintiff continued to provide legal services to Defendant from April 5, 2003 to and including July 14, 2003 at which time an itemized statement was sent to Defendant on April 15, 2003, a copy of which is in the possession of Defendant, showing an unpaid balance of \$6,749.22.

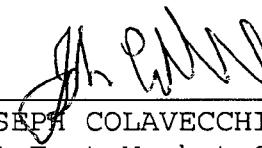
6. Plaintiff continued to provide legal services to Defendant from July 15, 2003 through and including July 30, 2004. An itemized statement setting forth services was sent to Defendant, a copy of which is in her possession, in the amount of \$3791.50 bringing the unpaid fee for legal services to \$10,540.72 as of July 30, 2004.

7. Plaintiff continued to provide legal services to Defendant from July 31, 2004 to and including July 14, 2005. An itemized statement for said services was supplied to Defendant and is in her possession, said services and costs being in the amount of \$3,021.75 bringing the unpaid fee for legal services to \$13,562.47.

8. The amount of \$13,562.47 is the unpaid balance for legal services as of the date of this Complaint.

9. Plaintiff has demanded payment for said legal services and costs in the total amount of Thirteen Thousand Five Hundred Sixty-two Dollars and Forty-seven Cents (\$13,562.47) from Defendant, but Defendant has refused and still refuses to pay the same or any part thereof.

WHEREFORE, Plaintiff demands judgment against the Defendant in the amount of Thirteen Thousand Five Hundred Sixty-two Dollars and Forty-seven Cents (\$13,562.47), plus interest and costs.


JOSEPH COLAVECCHI, ESQUIRE
221 East Market Street
Clearfield, PA 16830

12/8/06

DATE

LAW OFFICES OF
COLAVECCHI
& COLAVECCHI
221 E. MARKET ST.
(ACROSS FROM
COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA

VERIFICATION

I, Joseph Colavecchi, Esquire, verify that the statements made in this Complaint are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.



JOSEPH COLAVECCHI, ESQUIRE

LAW OFFICES OF
COLAVECCHI
& COLAVECCHI
221 E. MARKET ST.
(ACROSS FROM
COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102242
NO: 06-2076-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: JOSEPH COLAVECCHI, ESQUIRE
vs.
DEFENDANT: TAMARA MARIE GRAY

SHERIFF RETURN

NOW, January 02, 2007 AT 11:00 AM SERVED THE WITHIN COMPLAINT ON TAMARA MARIE GRAY DEFENDANT AT TREASURE LAKE ROAD aka SEC 10 LOT 62, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO TAMARA MARIE GRAY, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: COUDRIET /

FILED
03/23/07
MAR 16 2007
CS
William A. Shaw
Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	COLAVECCHI	9105	10.00
SHERIFF HAWKINS	COLAVECCHI	9105	70.64

Sworn to Before Me This

____ Day of _____ 2007

So Answers,

*Chester A. Hawkins
by Tammy Harr*
Chester A. Hawkins
Sheriff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

JOSEPH COLAVECCHI,
Plaintiff
Vs.

TAMARA MARIE GRAY,
Defendant

CIVIL DIVISION
No. 06 - 2076 - CD

PRAECIPE TO ENTER JUDGMENT

Filed on Behalf of:

Plaintiff, JOSEPH COLAVECCHI

Counsel of Record for This
Party:

JOSEPH COLAVECCHI, ESQUIRE
Pa. I.D. #06810

COLAVECCHI & COLAVECCHI
221 East Market Street
P.O. Box 131
Clearfield, PA 16830

814/765-1566

LAW OFFICES OF
COLAVECCHI
& COLAVECCHI
221 E. MARKET ST.
(ACROSS FROM
COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA

FILED *at \$20.00 Atty*
019:35 cm Notice to debt
APR 12 2007 *Statement to Atty*
W.A.S.

William A. Shaw
Prothonotary/Clerk of Courts

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

JOSEPH COLAVECCHI,

Plaintiff : No. 06 - 2076 - CD

vs.

TAMARA MARIE GRAY,

Defendant :

PRAECIPE FOR JUDGMENT

TO: PROTHONOTARY OF CLEARFIELD COUNTY

The Defendant, Tamara Marie Gray, having been served on January 2, 2007, and no answer having been filed, a further ten (10) day notice was then served on Tamara Marie Gray on March 19, 2007, being attached to this Praecipe. No answer still having been filed to the Complaint, please assess damages as follows:

1. Amount of Debt: \$13,562.47

2. Interest from 12/13/06 to
4/5/07: \$ 250.86

3. Costs: \$ 165.64

TOTAL AMOUNT OF JUDGMENT: \$13,978.97

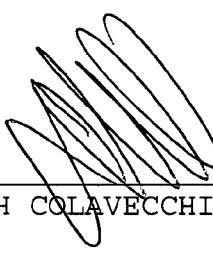
JOSEPH COLAVECCHI, ESQUIRE
Attorney for Plaintiff

AFFIDAVIT

JOSEPH COLAVECCHI, ESQUIRE, being duly sworn according to law, deposes and states as follows:

The last known address of judgment creditor is 221 East Market Street, Clearfield, Pennsylvania 16830.

The last known address of judgment debtor is 831 Treasure Lake, DuBois, Pennsylvania 15801.


JOSEPH COLAVECCHI, ESQUIRE

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

JOSEPH COLAVECCHI, ESQUIRE, :
Plaintiff : No. 06 - 2076 - CD
:
vs. :
:
TAMARA MARIE GRAY, :
Defendant :

TO: Tamara M. Gray
831 Treasure Lake
DuBois, PA 15801

DATE OF NOTICE: March 19, 2007

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO TAKE ACTION REQUIRED OF YOU IN THIS CASE. UNLESS YOU ACT WITHIN TEN (10) 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 NOTICE TO A LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE FOLLOWING OFFICE TO FIND OUT WHERE YOU CAN GET LEGAL HELP:

COURT ADMINISTRATOR'S OFFICE
Clearfield County Courthouse
230 East Market Street
Clearfield, PA 16830

814/765-2641, Ext. 5982

LAW OFFICES OF
COLAVECCHI
& COLAVECCHI
221 E. MARKET ST.
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COURTHOUSE)
P. O. BOX 131
CLEARFIELD, PA


JOSEPH COLAVECCHI, ESQUIRE
221 East Market Street
P.O. Box 131
Clearfield, PA 16830
814/765-1566

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

JOSEPH COLAVECCHI, _____ :

Plaintiffs
VS. :
TAMARA MARIE GRAY, _____ :

Defendants

COPY

NOTICE OF FILING JUDGMENT

(X) Notice is hereby given that a Judgment in the above-captioned matter has been entered against you in the amount of \$ 13,978.97 on April 12, 2007.

(X) A copy of all documents filed with the Prothonotary in support of the within Judgment is/are enclosed.

Willie Shanahan
PROTHONOTARY

By: _____

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

Name: Joseph Colavecchi, Esquire

Address: 221 E. Market Street

Clearfield, PA 16830

Telephone Number: 814/765-1566

(This Notice is given in accordance with PA R.C.P. 236)

Notice sent to:

Name: Tamara Marie Gray

Address: 831 Treasure Lake

DuBois, PA 15801

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

COPY

Joseph Colavecchi
Plaintiff(s)

No.: 2006-02076-CD

Real Debt: \$13,978.97

Atty's Comm: \$

Vs.

Costs: \$

Tamara Marie Gray
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: April 12, 2007

Expires: April 12, 2012

Certified from the record this April 12, 2007

William A. Shaw
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