

07-219-CD
Beneficial Cons. Vs Robert Doran

Beneficial Cons vs Robert Doran
2007-219-CD

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

BENEFICIAL CONSUMER
DISCOUNT COMPANY

Plaintiff,

Vs.

CIVIL DIVISION

No. 2007-219-C.D

ROBERT L. DORAN
A/K/A ROBERT L. DORAN JR.
Defendant(s)

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 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.**

DAVID S. MEHOLICK, COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
CLEARFIELD, PA 16830
814-765-2641, EXT. 5982

FILED

FEB 12 2007

11:50 AM

William A. Shaw
Prothonotary/Clerk of Courts

1 CEN to
SHAW

THIS IS AN ATTEMPT TO
COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL
BE USED FOR THAT PURPOSE

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

BENEFICIAL CONSUMER
DISCOUNT COMPANY,

Plaintiff,

vs.

ROBERT L. DORAN
A/K/A ROBERT L. DORAN JR.,

Defendant.

Plaintiff's Address:
2700 Sanders Road
Prospect Heights, IL 60070

Defendant's Address:
127 BELL LANE
WOODLAND, PA 16881

CIVIL DIVISION

No.

TYPE OF PLEADING:

Complaint

TYPE OF CASE:

Civil Action

FILED ON BEHALF OF:

BENEFICIAL CONSUMER
DISCOUNT COMPANY

COUNSEL OF RECORD:

CATHY ANN CHROMULAK, ESQ.
PA ID NO. 42067
MAUREEN A. DOWD, ESQ.
PA ID NO. 90549
KURT J. WINTER, ESQ.
PA ID NO. 84801

CHROMULAK & ASSOCIATES, LLC

375 Southpointe Boulevard
4th Floor
Canonsburg, PA 15317

(724) 916-2400

**THIS IS AN ATTEMPT TO
COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL
BE USED FOR THAT PURPOSE.**

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

BENEFICIAL CONSUMER
DISCOUNT COMPANY,

CIVIL DIVISION

No.

Plaintiff,

vs.

ROBERT L. DORAN
A/K/A ROBERT L. DORAN JR.,

Defendant.

COMPLAINT

AND NOW COMES, the Plaintiff, BENEFICIAL CONSUMER DISCOUNT COMPANY, by its Attorneys, **Chromulak & Associates, LLC**, with its Civil Action Complaint, the following of which is a statement thereof:

1. BENEFICIAL CONSUMER DISCOUNT COMPANY is a Corporation, duly authorized to conduct business in the Commonwealth of Pennsylvania, with its principal office situated at 2700 Sanders Road, Prospect Heights, IL 60070, hereinafter referred to as "Plaintiff".
2. ROBERT L. DORAN A/K/A ROBERT L. DORAN JR. is an adult individual residing at 127 BELL LANE, WOODLAND, PA 16881.
3. On or about NOVEMBER 30, 2004, Defendant entered into a written Loan Agreement with the Plaintiff, a copy of which is attached hereto as "Exhibit A" and incorporated herein.
4. Pursuant to the Loan Agreement with Defendant, Plaintiff advanced funds to the Defendant.

**THIS IS AN ATTEMPT TO
COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL
BE USED FOR THAT PURPOSE.**

5. Defendant is in default under the terms and conditions of the aforementioned Loan Agreement for failing to make payments when due, with the last payment having been made on or about JULY 13, 2006.

6. Pursuant to the terms of the Loan Agreement, Plaintiff has the right to require payment of the entire amount owed upon default. The total amount due, including principal and interest, and owing by the Defendant is in the sum of NINE THOUSAND ONE HUNDRED SEVENTY SIX AND 16/100 (\$9,176.16) DOLLARS as of JANUARY 3, 2007.

7. Numerous demands have been made upon Defendant by Plaintiff, but Defendant has failed or refused to pay.

8. Pursuant to the Loan Agreement, Plaintiff is entitled to recover costs of collection and reasonable attorney's fees.

WHEREFORE, Plaintiff claims damages in the sum of NINE THOUSAND ONE HUNDRED SEVENTY SIX AND 16/100 (\$9,176.16) DOLLARS, with interest thereon at the rate of 17.99% from JANUARY 3, 2007, plus court costs and attorney's fees.

Respectfully submitted,
Chromulak & Associates, LLC

By: *Maureen & David*
CATNY ANN CHROMULAK, ESQ.
PA ID NO. 42067
MAUREEN A. DOWD, ESQ.
PA ID NO. 90549
KURT J. WINTER, ESQ.
PA ID NO. 84801

Attorneys for Plaintiff
375 Southpointe Boulevard
4th Floor
Canonsburg, PA 15317

**THIS IS AN ATTEMPT TO
COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL
BE USED FOR THAT PURPOSE.**

LOAN REPAYMENT AND SECURITY AGREEMENT (Page 1 of 3)

LENDER (called "We", "Us", "Our")

BENEFICIAL CONSUMER DISCOUNT COMPANY
90 BEAVER DRIVE
SUITE 114 C
DUBOIS PA 15801

BORROWERS (called "You", "Your")

DORAN JR , ROBERT L
SS# 7514
127 BELL LN
WOODLAND PA 16881

LOAN NO: 5622

DATE OF LOAN	FIRST PAYMENT DUE DATE	OTHERS	SCHEDULED MATURITY	CONTRACT RATE (per year)
11/30/2004	12/30/2004	SAME DAY OF EACH MONTH	11/30/2009	18.000 %
TOTAL OF PAYMENTS	AMOUNT FINANCED			
\$ 11,727.00	\$ 7,695.87			
TOTAL FINANCE CHARGE	SCHEDULED INTEREST	SERVICE CHARGE		OFFICIAL FEES
\$ 4,030.13	\$ 4,030.13	\$.00		\$.00
LIFE INS PREMIUM	DISABILITY INS PREMIUM	IUI PREMIUM		
\$ 255.06	\$ NONE	\$ NONE		
PROPERTY INS (PPI)				
NONE				
NON FILING INSURANCE PREMIUM				
NONE				
FIRST INSTALLMENT	MONTHLY INSTALLMENT		TERM PERIOD	
\$ 195.45	\$ 195.45		60	

YOU ARE GIVING US A SECURITY INTEREST COVERING:

INSURED	YEAR	DESCRIPTION	MAKE/MODEL	SERIAL NUMBER
Y	1996	MOTOR VEHICLE	CHEVY	CAVALIER

REQUIRED INSURANCE. You must obtain insurance for term of loan covering security for this loan as indicated below, naming us as Loss Payee:

Title insurance on real estate security.

Fire and extended coverage insurance on real estate security.

Physical damage insurance on vehicle listed under "Security" above if "Y" appears under "Insured".

Physical damage insurance on other property listed under "Security" above if "Y" appears under "Insured".

You may obtain any required insurance from anyone you choose.

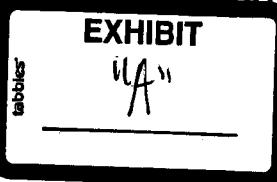
(See "Security" paragraph above for description of security to be insured.)

NOTICE: THE FOLLOWING PAGE CONTAINS ADDITIONAL CONTRACT TERMS.

03-01-00 NRE



*D930F42D5K94CEA8000PA8750110**00



ORIGINAL

PAB75011

LOAN REPAYMENT AND SECURITY AGREEMENT (Page 2 of 3)

PAYMENT. In return for this loan, you will pay us the Total of Payments (the sum of Finance Charges plus Amount Financed), in monthly payments stated on page one. The Finance Charge is the total of Interest plus Service Charge. You may pay more at any time. You will pay us at our business address as stated on page one or other address given you. If more than one Borrower is named on page one, we may enforce this Agreement against all, or any, Borrowers, but not in a combined amount greater than the amount owed.

DATE ON WHICH FINANCE CHARGE BEGINS. Finance Charges begin on the date of disbursement. If this loan is made by mail, the date on which the Finance Charge begins is postponed by the number of days from the date of this Agreement to the date of disbursement. Payment due dates and effective date of any optional insurance purchased are also postponed.

PAY-OUTS. You agree to pay-outs of Amount Financed as shown on Truth-In-Lending disclosure form. If pay-outs change because loan closing is delayed, (a) you shall pay additional amounts due at closing, or (b) your cash or check will be reduced to cover additional pay-outs.

PREPAYMENT. If you fully pay before final payment due date, the amount you owe will be reduced by unearned Finance Charge (but not Service Charge) determined by the "Rule of 78ths".

MATURITY. After the final payment due date stated on page one you will pay interest at the rate of 18% per year.

SECURITY. You agree to give us a security interest in the property identified on page one, which will secure all indebtedness, including future advances under this Agreement.

LATE CHARGE. If you don't pay any payment in 10 days after it's due, you will also pay 1 1/2% per month on the amount overdue (subject to a \$1.00 minimum charge).

BAD CHECK CHARGE. We will charge you a fee of \$20 if any payment check is returned because of insufficient funds or is otherwise dishonored. You agree that we may deduct this charge from a monthly payment.

FAILURE TO PAY. If you don't pay any payment on time or fail to keep any required insurance in force, (a) all your payments may become due at once and without notifying you before bringing suit, we may sue for the total amount you owe less any unearned Finance Charges you would receive if you fully prepaid, and (b) you will also pay our reasonable attorney fees, if the attorney is not our salaried employee, for legal proceedings to collect this loan or realize on security.

EXCHANGE OF INFORMATION. You understand that from time to time we may receive credit information concerning you from others, such as stores, other lenders, and credit reporting agencies. You authorize us to share any information, on a regular basis, we obtain related to your Account, including but not limited to credit reports and insurance information, with any of our affiliated corporations, subsidiaries or other third parties. The uses of this information may include an inquiry to determine if you qualify for additional offers of credit. You also authorize us to share any information regarding your Account with any of our affiliated corporations, subsidiaries or other third parties. You may prohibit the sharing of such information (except for the sharing of information about transactions or experiences between us and you) by sending a written request which contains your full name, Social Security Number and Address to us at P.O. Box 1547, Chesapeake, VA 23320.

If you fail to fulfill the terms of your credit obligation, a negative report reflecting on your credit record may be submitted to a Credit Reporting Agency. You agree that the Department of Motor Vehicles (or your state's equivalent of such department) may release your residence address to us, should it become necessary to locate you. You agree that our supervisory personnel may listen to telephone calls between you and our representatives in order to evaluate the quality of our service to you.

INSURANCE. Optional credit insurance and any required insurance disclosures are attached to this Agreement and are incorporated herein by reference.

ALTERNATIVE DISPUTE RESOLUTION AND OTHER RIDERS. The terms of the Arbitration Agreement and any other Riders signed as part of this loan transaction are incorporated into this Agreement by reference.

APPLICABLE LAW. The Pennsylvania Consumer Discount Company Act (CDCA), Title 7, Purdon's Pennsylvania Statutes, governs this loan.

NOTICE: THE FOLLOWING PAGE CONTAINS ADDITIONAL CONTRACT TERMS.



LOAN REPAYMENT AND SECURITY AGREEMENT (Page 3 of 3)

YOU HAVE RECEIVED A COMPLETE
COPY OF THIS AGREEMENT AND THE
TRUTH-IN-LENDING DISCLOSURES.

BORROWERS:

John D. Doran Jr. (SEAL)

(SEAL)

WITNESS:

J. D. M. M. (SEAL)



TRUTH-IN-LENDING DISCLOSURES (Page 1 of 2)

LENDER (Called "We", "Our", "Us")
 BENEFICIAL CONSUMER DISCOUNT COMPANY
 90 BEAVER DRIVE
 SUITE 114 C
 DUBOIS PA 15801

BORROWERS (Called "You", "Your")

DORAN JR , ROBERT L
 127 BELL LN
 WOODLAND PA 16881

LOAN NO: 5622

• ANNUAL PERCENTAGE RATE The cost of your credit as a yearly rate.	• FINANCE CHARGE The dollar amount the credit will cost you.	Amount Financed The amount of credit provided to you or on your behalf.	Total of Payments The amount you will have paid after you have made all payments as scheduled.	Date of Loan					
18.000%	\$ 4030.13	\$ 7696.87	\$ 11727.00	11/30/04					
Your payment schedule will be:									
Number of Payments	Amount of Payments		When Payments Are Due						
1	\$ 195.45		12/30/04						
059	\$ 195.45		Day 30	of each month thereafter.					
SECURITY: YOU ARE GIVING US A SECURITY INTEREST IN: CHEVY MOTOR VEHICLE									
<u>Late Charge:</u> If you don't pay any payment in 10 days after it's due, you will also pay 1 1/2% per month on the amount overdue (subject to a \$1.00 minimum charge).									
<u>Prepayment:</u> If you pay off early, you may be entitled to a refund of part of the Finance Charge. See the contract documents for any additional information about nonpayment, default, any required repayment in full before the scheduled date, and prepayment refunds.									

NOTICE: The following page(s) contain(s) additional information.



TRUTH-IN-LENDING DISCLOSURES (Page 2 of 2)

ITEMIZATION OF THE AMOUNT FINANCED

TO: BENEFICIAL ACCOUNT # 71172300589688.....	\$ 7440.77
TO: APPLY TO NEW ACCT.....	\$ 1.04
CREDIT LIFE INSURANCE (PAID TO INSURANCE COMPANY).....	\$ 255.06
 AMOUNT FINANCED (EXCLUDING PREPAID FINANCE CHARGE).....	\$ 7696.87

08-14-04 NRE TIL

PAB18122



*D930F42D5K94FED9000PAB181220**DORAN

*

ORIGINAL

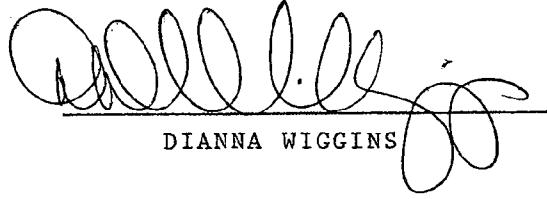
VERIFICATION

DIANNA WIGGINS, Recover Specialist for

BENEFICIAL CONSUMER DISCOUNT COMPANY

Deposes and says subject to the penalties of 18 Pa C.S. Section 4904 relating to unsworn falsification to authorities, that the facts set forth in the forgoing Complaint are true and correct to the best of her knowledge, information and belief.

DIANNA WIGGINS



FILED
FEB 12 2001
William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102447
NO. 07-219-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: BENEFICIAL CONSUMER DISCOUNT COMPANY
vs.
DEFENDANT: ROBERT L. DORAN A/K/A ROBERT L. DORAN JR.

SHERIFF RETURN

NOW, February 22, 2007 AT 10:58 AM SERVED THE WITHIN COMPLAINT ON ROBERT L. DORAN aka ROBERT L. DORAN JR. DEFENDANT AT 127 BELL LANE, WOODLAND, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO ROBERT L. DORAN AKA, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: HUNTER /

FILED
03/13/07
MAY 09 2007
William A. Shaw
Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	CHROMULAK	16518	10.00
SHERIFF HAWKINS	CHROMULAK	16518	22.85

Sworn to Before Me This

____ Day of _____ 2007

So Answers,

*Chester A. Hawkins
by Marilyn Hark*
Chester A. Hawkins
Sheriff

FILED

MAY 09 2007

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

BENEFICIAL CONSUMER
DISCOUNT COMPANY,

Plaintiff,

vs.

ROBERT L. DORAN A/K/A
ROBERT L. DORAN JR.,

Defendant.

Plaintiff's Address:
2700 Sanders Road
Prospect Heights, IL 60070

Defendant's Address:
127 BELL LANE
WOODLAND, PA 16881

Dated: MAY 25, 2007

CIVIL DIVISION

No. 2007-219-CD

TYPE OF PLEADING:

Praeclipe for Default Judgment

TYPE OF CASE:

Civil Action

FILED ON BEHALF OF:

BENEFICIAL CONSUMER
DISCOUNT COMPANY

COUNSEL OF RECORD:

CATHY ANN CHROMULAK, ESQUIRE
PA ID NO. 42067
MAUREEN A. DOWD, ESQUIRE
PA ID NO. 90549
BETH ARNOLD HOWELL, ESQUIRE
PA ID NO. 203606
CHRISTINE A. SAUNDERS, ESQUIRE
PA ID NO. 203373

CHROMULAK & ASSOCIATES, L.L.C.
375 Southpointe Boulevard
4th Floor
Canonsburg, PA 15317
(724) 916-2400

**THIS IS AN ATTEMPT TO
COLLECT A DEBT AND
ANY INFORMATION
OBTAINED WILL BE USED
FOR THAT PURPOSE.**

FILED *pa \$20.00 AM*
MAY 10 2007 55 LM *cc & notice to*
MAY 29 2007 *def* *LM* *cc & Statement*
William A. Shaw *No CC & Statement*
Prothonotary/Clerk of Courts *to AM*

TO: PROTHONOTARY

Please enter judgment by default against the within-named defendant, **ROBERT L. DORAN A/K/A ROBERT L. DORAN JR.**, for failure to file an Answer as follows:

Amount Claimed in Complaint:	\$ 9,176.16
Interest from 1/04/07 through 5/25/07:	616.28
Costs of Collection through 5/25/07:	<u>537.85</u>
TOTAL	\$10,330.29

With interest accruing on the total balance of **\$10,330.29** at the rate of 6% per annum, together with additional costs of suit.

BY Beth Arnold Howell
CATHY ANN CHROMULAK, ESQUIRE
MAUREEN A. DOWD, ESQUIRE
BETH ARNOLD HOWELL, ESQUIRE
CHRISTINE A. SAUNDERS, ESQUIRE
Attorneys for Plaintiff

**AFFIDAVIT OF NON-MILITARY SERVICE
AND CERTIFICATION OF MAILING OF NOTICE OF
INTENT TO TAKE DEFAULT JUDGMENT**

COMMONWEALTH OF PENNSYLVANIA)
) SS:
COUNTY OF WASHINGTON)

Before me, the undersigned authority, a Notary Public in and for said County and State, personally appeared, Beth Arnold Howell, ESQUIRE, attorney for and authorized representative of plaintiff who, being duly sworn according to law, deposes and says that the defendant is not in the military service of the United States of America to the best of her knowledge, information and belief and certifies that the Notice of Intent to take Default Judgment was mailed to defendant on **MAY 14, 2007** by certificate of mailing in accordance with Pa.R.C.P. 237.1, as evidenced by the attached copy.

Beth Arnold Howell
CATHY ANN CHROMULAK, ESQUIRE
MAUREEN A. DOWD, ESQUIRE
BETH ARNOLD HOWELL, ESQUIRE
CHRISTINE A. SAUNDERS, ESQUIRE

Sworn to and subscribed before me
This 25th day of May, 2007.

Heather L. Hatfield
Notary Public

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Heather L. Hatfield, Notary Public
Cecil Twp., Washington County
My Commission Expires June 29, 2010

Member, Pennsylvania Association of Notaries

**THIS IS AN ATTEMPT TO
COLLECT A DEBT AND
ANY INFORMATION
OBTAINED WILL BE USED
FOR THAT PURPOSE.**

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

BENEFICIAL CONSUMER
DISCOUNT COMPANY,

CIVIL DIVISION

Plaintiff,

No. 2007-219-CD

Vs.

ROBERT L. DORAN A/K/A
ROBERT L. DORAN JR.,

Defendant(s).

TO: ROBERT L. DORAN A/K/A
ROBERT L. DORAN JR.
127 BELL LANE
WOODLAND, PA 16881

DATE OF NOTICE: MAY 14, 2007

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 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.

DAVID S. MEHOLICK, COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
CLEARFIELD, PA 16830
814-765-2641, EXT. 5982

By:

Beth Arnold Howell
CATHY ANN CHROMULAK, ESQ.
MAUREEN A. DOWD, ESQ.
BETH ARNOLD HOWELL, ESQ.
CHRISTINE A. SAUNDERS, ESQ.
Attorneys for Plaintiff
375 Southpointe Boulevard
4th Floor
Canonsburg, PA 15317

THIS IS AN ATTEMPT TO
COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL
BE USED FOR THAT PURPOSE.

CHROMULAK & ASSOCIATES, L.L.C.

ATTORNEYS AT LAW
375 SOUTHPOINTE BLVD.
4TH FLOOR
CANONSBURG, PA 15317

Line Number	Article	Name of Addressee, Street and Post Office Address	Postage	Fee	Handling (if Regis.)	Act. Value	Insured Value	Check appropriate block for Indicate type of mail			Affix certif adic Postn Due S if C
								<input type="checkbox"/> Registered Insured	<input type="checkbox"/> Return Receipt for Merchandise	<input type="checkbox"/> Registered Mail: With Postal Insurance	
1		Russell J. Yoder 625 Market Street Mifflinburg, PA 17844						<input type="checkbox"/> Int'l Recorded Del.	<input type="checkbox"/> Without Postal Insurance		
2		Darlene E. Yoder 625 Market Street Mifflinburg, PA 17844						<input type="checkbox"/> COD	<input type="checkbox"/> Express Mail		
3	✓	Robert L. Doran a/k/a Robert L. Doran Jr. 127 Bell Lane Woodland, PA 16881						<input type="checkbox"/> Certified			
4		Wachovia Bank (Nelson, E.) 123 South Broad Street Philadelphia, PA 19102									
5		Dawn S. Wiess c/o David Mersky, Esq. 731 North Duke Street Lancaster, PA 17601									
6											
7											
8											
9											
10											
11											
12											
13											
14											
15		Total Number of Pieces Received at Post Office <i>Fifteen</i>	Total Number of Pieces Postmaster, Per (Name of Receiving Employee) <i>R. F. E. R. R.</i>								

The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstruction insurance is \$50,000 per piece subject to a limit of \$500,000 per occurrence. The maximum indemnity payable on Express Mail merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on insured and COD mail. See International Mail Manual for limitations of coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.

FILED

MAY 29 2007

William A. Shaw
Prothonotary/Clerk of Courts

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

COPY

Beneficial Consumer Discount Co.
Plaintiff(s)

No.: 2007-00219-CD

Real Debt: \$10,330.29

Atty's Comm: \$

Vs. Costs: \$

Int. From: \$

Robert L. Doran
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: May 29, 2007

Expires: May 29, 2012

Certified from the record this May 29, 2007



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

BENEFICIAL CONSUMER
DISCOUNT COMPANY,

CIVIL DIVISION

No. 2007-219-CD

Plaintiff,
vs.

ROBERT L. DORAN A/K/A
ROBERT L. DORAN JR.,

Defendant.

COPY

NOTICE OF ORDER, DECREE OR JUDGMENT

TO: **ROBERT L. DORAN A/K/A
ROBERT L. DORAN JR.
127 BELL LANE
WOODLAND, PA 16881**

Defendant

You are hereby notified that an Order, Decree or Judgment was entered in the above captioned proceeding on May 29, 2007.

A copy of the Order or Decree is enclosed, or
 The judgment is as follows: \$10,330.29 plus interest at the rate of 6% per annum and additional costs of suit.

Willie J. Orr, Jr.

Deputy Prothonotary

**THIS IS AN ATTEMPT TO
COLLECT A DEBT AND
ANY INFORMATION
OBTAINED WILL BE USED
FOR THAT PURPOSE.**

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

BENEFICIAL CONSUMER
DISCOUNT COMPANY,

Plaintiff,

vs.

ROBERT L. DORAN a/k/a
ROBERT L. DORAN, JR.,

Defendant,

and

CLEARFIELD BANK &
TRUST COMPANY,

Garnishee.

Plaintiff's Address:
2700 Sanders Road
Prospect Heights, IL 60070

Defendant's Address:
127 BELL LANE
WOODLAND, PA 16881

Garnishee's Address:
11 NORTH 2ND STREET
CLEARFIELD, PA 16830

Date: June 14, 2007

CIVIL DIVISION

No. 2007-219-CD

TYPE OF PLEADING:

PRAECIPE FOR A WRIT OF
EXECUTION

FILED ON BEHALF OF:

BENEFICIAL CONSUMER DISCOUNT
COMPANY

COUNSEL OF RECORD:

CATHY ANN CHROMULAK, ESQ.

PA ID NO. 42067

MAUREEN A. DOWD, ESQ.

PA ID NO. 90549

CHRISTINE A. SAUNDERS, ESQ.

PA ID NO. 203373

BETH ARNOLD HOWELL, ESQ.

PA ID NO. 203606

CHROMULAK & ASSOCIATES, L.L.C.

375 Southpointe Boulevard

4th Floor

Canonsburg, PA 15317

(724) 916-2400

FILED

JUN 18 2007

6/19/07 (u)
William A. Shaw
Prothonotary/Clerk of Courts

No. 219-CD

**6 WRT TO
SHAW,**

**THIS IS AN ATTEMPT TO
COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL
BE USED FOR THAT PURPOSE.**

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

BENEFICIAL CONSUMER
DISCOUNT COMPANY,

CIVIL DIVISION

No. 2007-219-CD

Plaintiff,

vs.

ROBERT L. DORAN a/k/a ROBERT L. DORAN, JR.,
Defendant,

and

CLEARFIELD BANK & TRUST COMPANY,

Garnishee.

PRAECIPE FOR WRIT OF EXECUTION

TO: The Prothonotary

Please issue a Writ of Execution in the above matter,

1. directed to the Sheriff of CLEARFIELD County;
2. against ROBERT L. DORAN a/k/a ROBERT L. DORAN, JR., defendant, and
3. against CLEARFIELD BANK & TRUST COMPANY, garnishee,
4. and index this writ
 - a. against ROBERT L. DORAN a/k/a ROBERT L. DORAN, JR., defendant, and
 - b. against CLEARFIELD BANK & TRUST COMPANY, garnishee, and any property of the defendant in the name of Garnishee:

Said Writ of Execution is pursuant to all monies due defendant in any accounts, individual and joint, personal and business.

5.	Amount of Judgment	\$10,330.29
	Additional Interest to Date	\$ 27.52
	(Costs to be added)	\$ _____
	Pursuant to Writ of Execution And Service of Writ	\$10,357.81

Prothonotary costs 8125.-

**THIS IS AN ATTEMPT TO
COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL
BE USED FOR THAT PURPOSE.**

Beth Arnold Howell
CATHY ANN CHROMULAK, ESQ.
MAUREEN A. DOWD, ESQ.
CHRISTINE A. SAUNDERS, ESQ.
BETH ARNOLD HOWELL, ESQ.

BUCKINGHAM COUNTY

William A. Shaw
Prothonotary/Clerk of Courts

JUN 18 2001

FILED

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

BENEFICIAL CONSUMER
DISCOUNT COMPANY,

Plaintiff,

vs.

ROBERT L. DORAN a/k/a
ROBERT L. DORAN, JR.,

Defendant,

CLEARFIELD BANK &
TRUST COMPANY,

Garnishee.

Plaintiff's Address:
2700 Sanders Road
Prospect Heights, IL 60070

CIVIL DIVISION

No. 2007-219-CD

TYPE OF PLEADING:

Claim for Exemption

TYPE OF CASE:

Civil Action

FILED ON BEHALF OF:

BENEFICIAL CONSUMER DISCOUNT
COMPANY

COUNSEL OF RECORD:

CATHY ANN CHROMULAK, ESQ.
PA ID NO. 42067

MAUREEN A. DOWD, ESQ.
PA ID NO. 90549

CHRISTINE A. SAUNDERS, ESQ.
PA ID NO. 203373

BETH ARNOLD HOWELL, ESQ.
PA ID NO. 203606

CHROMULAK & ASSOCIATES, L.L.C.

375 Southpointe Boulevard
4th Floor
Canonsburg, PA 15317
(724) 916-2400

THIS IS AN ATTEMPT TO
COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL
BE USED FOR THAT PURPOSE.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BENEFICIAL CONSUMER DISCOUNT
COMPANY,

Plaintiff,

CIVIL DIVISION

No. 2007-219-CD

Vs.

ROBERT L. DORAN a/k/a ROBERT L.
DORAN, JR.,

Defendant,

and

CLEARFIELD BANK & TRUST COMPANY,
Garnishee.

**WRIT OF EXECUTION
NOTICE**

This paper is a "Writ of Execution". It has been issued because there is a judgment against you. It may cause your property to be held or taken to pay the judgment. You may have legal rights to prevent your property from being taken. A lawyer can advise you more specifically of these rights. If you wish to exercise your rights, you must act promptly.

The law provides that certain property cannot be taken and sold by the Sheriff to satisfy your debts. **SUCH PROPERTY IS SAID TO BE EXEMPT**. No matter what you owe, there is a **DEBTOR'S EXEMPTION** established by law. This means that no matter what happens, the Sheriff must give you from the sale at least \$300.00 in cash or property. There are also other exemptions that may be applicable to you. Listed below is a summary of some of the major exemptions that may be applicable to you. If you have an exemption, you should do the following promptly:

1. Complete the claim form attached hereto, and demand a prompt hearing.
2. Deliver the form or mail it to the Sheriff's office at the address noted.

You should come to Court when and where you are told to appear ready to explain your exemption. **IF YOU DO NOT COME TO COURT AND PROVE YOUR EXEMPTION, YOU MAY LOSE SOME OF YOUR PROPERTY.**

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.

CLEARFIELD COUNTY LAWYER REFERRAL SERVICE
DAVID S. MEHOLIK
COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
CLEARFIELD, PA 16830

MAJOR EXEMPTIONS UNDER PENNSYLVANIA AND FEDERAL LAW

1. \$300.00 exemption set by law.
2. All wearing apparel used by yourself and all family members.
3. Bibles, school books, sewing machines, uniforms and equipment.
4. Tools of your trade, such as carpenter's tools.
5. Most wages and unemployment benefits.
6. Social Security benefits, certain retirement funds and accounts.
7. Certain Veteran and armed forces benefits.
8. Certain insurance proceeds.
9. Such other exemptions as may be provided by law.

CLAIM FOR EXEMPTION

TO THE SHERIFF:

We, the above-named Defendant(s), claim exemption of property from levy or attachment:

1. FROM MY PERSONAL PROPERTY IN MY POSSESSION WHICH HAS BEEN LEVIED UPON:

a. I desire that my statutory \$300.00 exemption be:

(1) set aside of kind (specify property to be set aside in kind):

(2) paid in cash following the sale of the property levied upon;

OR

b. I claim the following exemption: (specify property and basis or exemption):

2. FROM MY PROPERTY WHICH IS IN THE POSSESSION OF A THIRD PARTY, I CLAIM THE FOLLOWING EXEMPTIONS:

a. My \$300.00 STATUTORY EXEMPTION: in cash in kind (specify property):

b. Social Security benefits on deposit in the amount of

\$;

c. Other (specify amount and basis for exemption):

I request a prompt Court Hearing to determine the exemption. Notice of the Hearing should be given me at the following:

(Address)

(Telephone Number)

I verify that the statements made in this Claim for Exemption are true and correct. I understand that false statements herein are made subject to the penalties of 18 P.A.C.S. § 4904 relating to unsworn falsification to authorities.

Date: _____
Defendant: _____

Date: _____
Defendant: _____

THIS CLAIM TO BE FILED WITH:

CLEARFIELD COUNTY SHERIFF'S DEPARTMENT
P.O. BOX 549
CLEARFIELD, PA 16830
814-765-2641 EXT. 5986

Note: Under paragraphs (1) and (2) of the Writ, a description of specific property to be levied upon or attached may be set forth in the Writ or included in separate direction to the Sheriff.

Under paragraph (2) of the Writ, if attachment of a named Garnishee is desired, his name should be set forth in the space provided.

Under paragraph (3) of the Writ, the Sheriff may, as under prior practice, add as a Garnishee any person not named in this Writ who may be found in possession of property of the Defendant(s). See Rule 3111(a). For limitations on the power to attach tangible personal property, see Rule 3108(a). (b) Each Court shall, by local rule, designate the officer organization or person to be named in the notice.

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

Beneficial Consumer Discount Co.,

Vs.

NO.: 2007-00219-CD

Robert L. Doran, a/k/a
Robert L. Doran, Jr.

Clearfield Bank 7 Trust Company
Garnishee

TO THE SHERIFF OF CLEARFIELD COUNTY:

To satisfy the debt, interest and costs due BENEFICIAL CONSUMER DISCOUNT CO., Plaintiff(s) from ROBERT L. DORAN, a/k/a Robert L. Doran, Jr. , Defendant(s):

- (1) You are directed to levy upon the property of the defendant(s) and to sell interest(s) therein:

- (2) You are also directed to attach the property of the defendant(s) not levied upon in the possession of: Cleaarfild Bank & Trust Company
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 or Supplemental Income funds are directly deposited into an account of the defendant, the levy and attachment shall not include any funds that may be traced to Social Security direct deposits. In addition, the levy and attachment shall not include \$300.00 in the account of the defendant.**

AMOUNT DUE/PRINCIPAL: \$10,357.81
INTEREST: \$
ATTY'S COMM: \$
DATE: 06/18/2007

PROTHONOTARY'S COSTS PAID: \$125.00
SHERIFF: \$
OTHER COSTS: \$

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

Sheriff

William A. Shaw
Prothonotary/Clerk Civil Division

Requesting Party: Beth Arnold Howell, Esq.
375 Southpointe Blvd., 4th Floor
Canonsburg, PA 15317
724-9116-2400

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102915
NO: 07-219-CD
SERVICE # 1 OF 1
WRIT OF EXECUTION; INTERROGATORIES TO

GARNISHEE

PLAINTIFF: BENEFICIAL CONSUMER DISCOUNT COMPANY

vs.

DEFENDANT: ROBERT L. DORAN aka ROBERT L. DORAN JR.
TO: CLEARFIELD BANK & TRUST COMPANY, Garnishee

SHERIFF RETURN

NOW, June 29, 2007 AT 11:22 AM SERVED THE WITHIN WRIT OF EXECUTION; INTERROGATORIES TO GARNISHEE ON CLEARFIELD BANK & TRUST COMPANY, Garnishee DEFENDANT AT 11 N. 2ND ST., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO RON SAYERS, MANAGER A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION; INTERROGATORIES TO GARNISHEE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: HUNTER / DEHAVEN

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	CHROMULAK	18248	10.00
SHERIFF HAWKINS	CHROMULAK	18248	20.00

FILED
07/02/2007
JUL 02 2007
WMH

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

____ Day of _____ 2007

So Answers,

*Chester A. Hawkins
by Marilyn Harris*
Chester A. Hawkins
Sheriff

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

Beneficial Consumer Discount Co.,

Vs.

NO.: 2007-00219-CD

Robert L. Doran, a/k/a
Robert L. Doran, Jr.

Clearfield Bank 7 Trust Company
Garnishee

TO THE SHERIFF OF CLEARFIELD COUNTY:

To satisfy the debt, interest and costs due BENEFICIAL CONSUMER DISCOUNT CO., Plaintiff(s) from ROBERT L. DORAN, a/k/a Robert L. Doran, Jr. , Defendant(s):

- (1) You are directed to levy upon the property of the defendant(s) and to sell interest(s) therein:

- (2) You are also directed to attach the property of the defendant(s) not levied upon in the possession of: Clearfield Bank & Trust Company
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 or Supplemental Income funds are directly deposited into an account of the defendant, the levy and attachment shall not include any funds that may be traced to Social Security direct deposits. In addition, the levy and attachment shall not include \$300.00 in the account of the defendant.**

AMOUNT DUE/PRINCIPAL: \$10,357.81
INTEREST: \$
ATTY'S COMM: \$
DATE: 06/18/2007

PROTHONOTARY'S COSTS PAID: \$125.00
SHERIFF: \$
OTHER COSTS: \$



William A. Shaw
Prothonotary/Clerk Civil Division

Received this writ this 18 day
of June A.D. 2007
At 3:00 A.M./P.M.

Chesler A. Hawkins
Sheriff By Maelyn Hamm

Requesting Party: Beth Arnold Howell, Esq.
375 Southpointe Blvd., 4th Floor
Canonsburg, PA 15317
724-9116-2400

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

Beneficial Consumer Discount Co.,

Vs.

NO.: 2007-00219-CD

Robert L. Doran, a/k/a
Robert L. Doran, Jr.

Clearfield Bank 7 Trust Company
Garnishee

TO THE SHERIFF OF CLEARFIELD COUNTY:

To satisfy the debt, interest and costs due BENEFICIAL CONSUMER DISCOUNT CO., Plaintiff(s) from ROBERT L. DORAN, a/k/a Robert L. Doran, Jr. , Defendant(s):

- (1) You are directed to levy upon the property of the defendant(s) and to sell interest(s) therein:

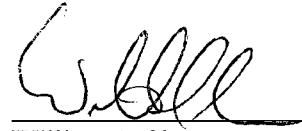
- (2) You are also directed to attach the property of the defendant(s) not levied upon in the possession of: Clearfield Bank & Trust Company
Garnishee(s) as follows:
and to notify the garnishee(s) that: (a) an attachment has been issued; (b) the garnishee(s) is/are enjoined from paying any debt to or 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 or Supplemental Income funds are directly deposited into an account of the defendant, the levy and attachment shall not include any funds that may be traced to Social Security direct deposits. In addition, the levy and attachment shall not include \$300.00 in the account of the defendant.**

AMOUNT DUE/PRINCIPAL: \$10,357.81
INTEREST: \$
ATTY'S COMM: \$
DATE: 06/18/2007

PROTHONOTARY'S COSTS PAID: \$125.00
SHERIFF: \$
OTHER COSTS: \$



William A. Shaw
Prothonotary/Clerk Civil Division

Received this writ this 18 day
of June A.D. 2007
At 3:00 A.M. (P.M.)

Chesley A. Hawley
Sheriff by Marilyn Hens

Requesting Party: Beth Arnold Howell, Esq.
375 Southpointe Blvd., 4th Floor
Canonsburg, PA 15317
724-9116-2400

FILED

JUL 02 2007

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

BENEFICIAL CONSUMER
DISCOUNT COMPANY,

Plaintiff,

vs.

ROBERT L. DORAN a/k/a
ROBERT L. DORAN, JR.,

Defendant,

and

CLEARFIELD BANK &
TRUST COMPANY,

Garnishee.

Plaintiff's Address:
2700 Sanders Road
Prospect Heights, IL 60070

CIVIL DIVISION:

No. 2007-219-CD

TYPE OF PLEADING:

Praeclipe to Discontinue
Against Garnishee, CLEARFIELD
BANK & TRUST COMPANY ONLY

TYPE OF CASE:

Civil Action

FILED ON BEHALF OF:

BENEFICIAL CONSUMER
DISCOUNT COMPANY

COUNSEL OF RECORD:

CATHY ANN CHROMULAK, ESQ.
PA ID NO. 42067
MAUREEN A. DOWD, ESQ.
PA ID NO. 90549
BETH ARNOLD HOWELL, ESQ.
PA ID NO. 203606
CHRISTINE A. SAUNDERS, ESQ.
PA ID NO. 203373

CHROMULAK & ASSOCIATES, L.L.C.
375 Southpointe Boulevard
4th Floor
Canonsburg, PA 15317
(724) 916-2400

THIS IS AN ATTEMPT TO
COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL
BE USED FOR THAT PURPOSE.

pd \$7.00 Atty
FILED m/11/40cm No cc.
AUG 08 2007 (cm)

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

BENEFICIAL CONSUMER
DISCOUNT COMPANY,

vs.

ROBERT L. DORAN a/k/a
ROBERT L. DORAN, JR.,

and

Plaintiff,

CIVIL DIVISION:

No. 2007-219-CD

Defendant,

CLEARFIELD BANK &
TRUST COMPANY,

Garnishee.

PRAECIPE TO DISCONTINUE GARNISHEE,
CLEARFIELD BANK & TRUST COMPANY ONLY

TO THE PROTHONOTARY:

Please discontinue this action against the above garnishee, CLEARFIELD BANK & TRUST COMPANY, and mark the docket accordingly.

Respectfully submitted,

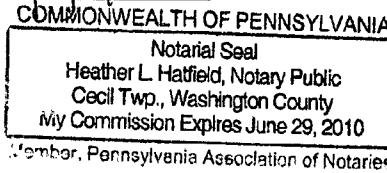
CHROMULAK & ASSOCIATES, L.L.C.

By: Cathy A. Saunders
CATHY ANN CHROMULAK, ESQ.
MAUREEN A. DOWD, ESQ.
BETH ARNOLD HOWELL, ESQ.
CHRISTINE A. SAUNDERS, ESQ.

Attorneys for Plaintiff
375 Southpointe Boulevard
4th Floor
Canonsburg, PA 15317

Sworn to and subscribed
Before me this 6th day
of August, 2007.

Heather L. Hatfield
Notary Public



THIS IS AN ATTEMPT TO
COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL
BE USED FOR THAT PURPOSE.

CERTIFICATE OF SERVICE

I, counsel for BENEFICIAL CONSUMER DISCOUNT COMPANY, hereby certify that a true and correct copy of the foregoing Praeclipe to Discontinue Against Garnishee, CLEARFIELD BANK & TRUST COMPANY Only was served upon the following by First Class Mail, postage prepaid on this 6th day of August, 2007.

CLEARFIELD BANK & TRUST COMPANY
11 NORTH 2ND STREET
CLEARFIELD, PA 16830

ROBERT L. DORAN a/k/a
ROBERT L. DORAN, JR.
127 BELL LANE
WOODLAND, PA 16881

Christina A. Saunders
Cathy Ann Chromulak, Esq.
Maureen A. Dowd, Esq.
Beth Arnold Howell, Esq.
Christine A. Saunders, Esq.

**THIS IS AN ATTEMPT TO
COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL
BE USED FOR THAT PURPOSE.**

FILED

AUG 08 2007

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

BENEFICIAL CONSUMER
DISCOUNT COMPANY,

Plaintiff,

vs.

ROBERT L. DORAN
A/K/A ROBERT L. DORAN JR.,

Defendant,

and

CLEARFIELD BANK &
TRUST COMPANY,

Garnishee.

Plaintiff's Address:
2700 Sanders Road
Prospect Heights, IL 60070

Defendant's Address:
127 BELL LANE
WOODLAND, PA 16881

Garnishee's Address:
11 N 2ND ST
CLEARFIELD, PA 16830

CIVIL DIVISION

No. 2007-219-CD

TYPE OF PLEADING:

PRAECIPE FOR A WRIT OF
EXECUTION

FILED ON BEHALF OF:

BENEFICIAL CONSUMER
DISCOUNT COMPANY

COUNSEL OF RECORD:

CATHY ANN CHROMULAK, ESQ.
PA ID NO. 42067
BETH ARNOLD HOWELL, ESQ.
PA ID NO. 203606
TERESA K. FUCHS, ESQ.
PA ID NO. 205696

CHROMULAK & ASSOCIATES, L.L.C.

375 Southpointe Boulevard
4th Floor
Canonsburg, PA 15317
(724) 916-2400

Date: April 14, 2008

THIS IS AN ATTEMPT TO
COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL
BE USED FOR THAT PURPOSE.

FILED Atty pd. 20.00
M/12/53/01 ICC/06
APR 17 2008
writsw/
William A. Shaw
Prothonotary/Clerk of Courts
Prop. desc.
to Sheriff
(K)

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

BENEFICIAL CONSUMER
DISCOUNT COMPANY,

CIVIL DIVISION

No. 2007-219-CD

Plaintiff,

vs.

ROBERT L. DORAN
A/K/A ROBERT L. DORAN JR.,
Defendant,
and

CLEARFIELD BANK & TRUST COMPANY,

Garnishee.

PRAECIPE FOR WRIT OF EXECUTION

TO: The Prothonotary

Please issue a Writ of Execution in the above matter,

1. directed to the Sheriff of CLEARFIELD County;
2. against ROBERT L. DORAN A/K/A ROBERT L. DORAN JR., defendant, and
3. against CLEARFIELD BANK & TRUST COMPANY, garnishee,
4. and index this writ
 - a. against ROBERT L. DORAN A/K/A ROBERT L. DORAN JR., defendant, and
 - b. against CLEARFIELD BANK & TRUST COMPANY, garnishee, and any property of the defendant in the name of Garnishee:

Said Writ of Execution is pursuant to all monies due defendant in any accounts, individual and joint, personal and business.

5.	Amount of Judgment	\$10,330.29
	Additional Interest to Date	\$ 742.90
	Less	\$ 1,865.49
	(Costs to be added)	\$ _____
	Pursuant to Writ of Execution	\$ 9,207.70
	And Service of Writ	

152.00 Prothonotary costs

Della K. Fuchs
CATHY ANN CHROMULAK, ESQ.
BETH ARNOLD HOWELL, ESQ.
TERESA K. FUCHS, ESQ.

**THIS IS AN ATTEMPT TO
COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL
BE USED FOR THAT PURPOSE.**

三

APR 17 2008

William A. Shaw
Prothonotary/Clerk of Courts

Digitized by srujanika@gmail.com

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BENEFICIAL CONSUMER DISCOUNT COMPANY,

COPY

Plaintiff,

No. 2007-219-CD

vs.

ROBERT L. DORAN A/K/A ROBERT L. DORAN JR.,

Defendant.

WRIT OF EXECUTION

COMMONWEALTH OF PENNSYLVANIA, COUNTY OF CLEARFIELD

TO THE SHERIFF OF CLEARFIELD, COUNTY, PENNSYLVANIA

To satisfy the judgment, interest and costs against defendant(s) ROBERT L. DORAN A/K/A ROBERT L. DORAN JR.;

(1) You are directed to levy upon the property of the defendant(s) and to sell his, her (or their) interest therein;

(2) You are also directed to attach the property of the defendant not levied upon in the possession of CLEARFIELD BANK & TRUST COMPANY as Garnishee(s) per the following description:

and to notify the Garnishee(s) that

(a) an attachment has been issued;

(b) the garnishee(s) is/are enjoined from paying out 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 not levied upon and subject to attachment is found in the possession of anyone other than the named garnishee(s), you are directed to notify them that they have been added as a garnishee and are enjoined as above stated.

COSTS:

Amount Due: \$ 10,330.29

Prothonotary: \$ 152.00

Interest From: \$ 742.90

Less \$ 1,865.49

Sheriff: \$

TOTAL \$ 9,207.70

Plus costs as per endorsement hereon.

If Social Security or Supplemental Income Funds are directly deposited into an account of the defendant, the levy and attachment shall not include any funds that may be traced to Social Security direct deposits. In addition, the levy and attachment shall not include \$300.00 in the account of the defendant.

William H. ...
4/17/08
Agent/Deputy

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104057
NO. 07-219-CD
SERVICE # 1 OF 1
WRIT OF EXECUTION; INTERROGATORIES TO GARNISHEE

PLAINTIFF: BENEFICIAL CONSUMER DISCOUNT COMPANY

VS.

DEFENDANT: ROBERT L. DORAN aka ROBERT L. DORAN JR.

TO: CLEARFIELD BANK & TRUST CO., Garnishee

SHERIFF RETURN

NOW, April 22, 2008 AT 1:05 PM SERVED THE WITHIN WRIT OF EXECUTION; INTERROGATORIES TO GARNISHEE ON CLEARFIELD BANK & TRUST COMPANY, Garnishee DEFENDANT AT 11 N 2ND ST., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO KATHY JACOBSON, MANAGER A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION; INTERROGATORIES TO GARNISHEE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DEHAVEN / HUNTER

FILED

07/28/08
APR 25 2008

William A. Shaw
Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	CHROMULAK	1352	10.00
SHERIFF HAWKINS	CHROMULAK	1352	20.00

Sworn to Before Me This

____ Day of _____ 2008

So Answers,

*Chester A. Hawkins
Marilyn Harris*
Chester A. Hawkins
Sheriff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BENEFICIAL CONSUMER DISCOUNT COMPANY,

Plaintiff,

No. 2007-219-CD

vs.

ROBERT L. DORAN A/K/A ROBERT L. DORAN JR.,

Defendant.

WRIT OF EXECUTION

COMMONWEALTH OF PENNSYLVANIA, COUNTY OF CLEARFIELD

TO THE SHERIFF OF CLEARFIELD, COUNTY, PENNSYLVANIA

To satisfy the judgment, interest and costs against defendant(s) ROBERT L. DORAN A/K/A ROBERT L. DORAN JR.;

(1) You are directed to levy upon the property of the defendant(s) and to sell his, her (or their) interest therein;

(2) You are also directed to attach the property of the defendant not levied upon in the possession of CLEARFIELD BANK & TRUST COMPANY as Garnishee(s) per the following description:

and to notify the Garnishee(s) that

(a) an attachment has been issued;

(b) the garnishee(s) is/are enjoined from paying out 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 not levied upon and subject to attachment is found in the possession of anyone other than the named garnishee(s), you are directed to notify them that they have been added as a garnishee and are enjoined as above stated.

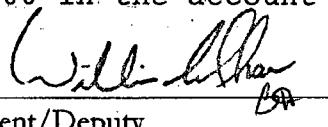
COSTS: Amount Due: \$ 10,330.29

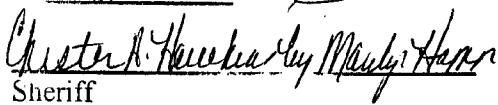
Prothonotary: \$ 152.00 Interest From: \$ 742.90
Sheriff: \$ Less \$ 1,865.49
TOTAL \$ 9,207.70

Plus costs as per endorsement hereon.

If Social Security or Supplemental Income Funds are directly deposited into an account of the defendant, the levy and attachment shall not include any funds that may be traced to Social Security direct deposits. In addition, the levy and attachment shall not include \$300.00 in the account of the defendant.

Received this writ this 17 day
of Apr A.D. 2008
At 2:00 A.M./P.M.


Agent/Deputy


Sheriff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

BENEFICIAL CONSUMER
DISCOUNT COMPANY,

Plaintiff,

vs.

ROBERT L. DORAN
A/K/A ROBERT L. DORAN JR.,

Defendant,

CLEARFIELD BANK &
TRUST COMPANY,

Garnishee.

Plaintiff's Address:
2700 Sanders Road
Prospect Heights, IL 60070

CIVIL DIVISION

No. 2007-219-CD

TYPE OF PLEADING:

Claim for Exemption

TYPE OF CASE:

Civil Action

FILED ON BEHALF OF:

BENEFICIAL CONSUMER
DISCOUNT COMPANY

COUNSEL OF RECORD:

CATHY ANN CHROMULAK, ESQ.
PA ID NO. 42067
BETH ARNOLD HOWELL, ESQ.
PA ID NO. 203606
TERESA K. FUCHS, ESQ.
PA ID NO. 205696

CHROMULAK & ASSOCIATES, L.L.C.

375 Southpointe Boulevard
4th Floor
Canonsburg, PA 15317
(724) 916-2400

THIS IS AN ATTEMPT TO
COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL
BE USED FOR THAT PURPOSE.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

BENEFICIAL CONSUMER
DISCOUNT COMPANY,

Plaintiff,

CIVIL DIVISION

No. 2007-219-CD

Vs.

ROBERT L. DORAN
A/K/A ROBERT L. DORAN JR.,
Defendant,
and

CLEARFIELD BANK & TRUST COMPANY,
Garnishee.

WRIT OF EXECUTION
NOTICE

This paper is a "Writ of Execution". It has been issued because there is a judgment against you. It may cause your property to be held or taken to pay the judgment. You may have legal rights to prevent your property from being taken. A lawyer can advise you more specifically of these rights. If you wish to exercise your rights, you must act promptly.

The law provides that certain property cannot be taken and sold by the Sheriff to satisfy your debts. **SUCH PROPERTY IS SAID TO BE EXEMPT**. No matter what you owe, there is a **DEBTOR'S EXEMPTION** established by law. This means that no matter what happens, the Sheriff must give you from the sale at least \$300.00 in cash or property. There are also other exemptions that may be applicable to you. Listed below is a summary of some of the major exemptions that may be applicable to you. If you have an exemption, you should do the following promptly:

1. Complete the claim form attached hereto, and demand a prompt hearing.
2. Deliver the form or mail it to the Sheriff's office at the address noted.

You should come to Court when and where you are told to appear ready to explain your exemption. **IF YOU DO NOT COME TO COURT AND PROVE YOUR EXEMPTION, YOU MAY LOSE SOME OF YOUR PROPERTY.**

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.

CLEARFIELD COUNTY LAWYER REFERRAL
DAVID S. MEHOLIK
COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
CLEARFIELD, PA 16830

MAJOR EXEMPTIONS UNDER PENNSYLVANIA AND FEDERAL LAW

1. \$300.00 exemption set by law.
2. All wearing apparel used by yourself and all family members.
3. Bibles, school books, sewing machines, uniforms and equipment.
4. Tools of your trade, such as carpenter's tools.
5. Most wages and unemployment benefits.
6. Social Security benefits, certain retirement funds and accounts.
7. Certain Veteran and armed forces benefits.
8. Certain insurance proceeds.
9. Such other exemptions as may be provided by law.

CLAIM FOR EXEMPTION

TO THE SHERIFF:

We, the above-named Defendant(s), claim exemption of property from levy or attachment:

1. FROM MY PERSONAL PROPERTY IN MY POSSESSION WHICH HAS BEEN LEVIED UPON:

a. I desire that my statutory \$300.00 exemption be:

(1) set aside of kind (specify property to be set aside in kind):

(2) paid in cash following the sale of the property levied upon;

OR

b. I claim the following exemption: (specify property and basis or exemption):

2. FROM MY PROPERTY WHICH IS IN THE POSSESSION OF A THIRD PARTY, I CLAIM THE FOLLOWING EXEMPTIONS:

a. My \$300.00 STATUTORY EXEMPTION: in cash in kind (specify property):

b. Social Security benefits on deposit in the amount of
\$;

c. Other (specify amount and basis for exemption):

I request a prompt Court Hearing to determine the exemption. Notice of the Hearing should be given me at the following:

(Address)

(Telephone Number)

I verify that the statements made in this Claim for Exemption are true and correct. I understand that false statements herein are made subject to the penalties of 18 P.A.C.S. § 4904 relating to unsworn falsification to authorities.

Date: _____
Defendant: _____

Date: _____
Defendant: _____

THIS CLAIM TO BE FILED WITH:

CLEARFIELD COUNTY SHERIFF'S OFFICE
P.O. BOX 549
CLEARFIELD, PA 16830
(814) 765-2641

Note: Under paragraphs (1) and (2) of the Writ, a description of specific property to be levied upon or attached may be set forth in the Writ or included in separate direction to the Sheriff.

Under paragraph (2) of the Writ, if attachment of a named Garnishee is desired, his name should be set forth in the space provided.

Under paragraph (3) of the Writ, the Sheriff may, as under prior practice, add as a Garnishee any person not named in this Writ who may be found in possession of property of the Defendant(s). See Rule 3111(a). For limitations on the power to attach tangible personal property, see Rule 3108(a). (b) Each Court shall, by local rule, designate the officer organization or person to be named in the notice.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

BENEFICIAL CONSUMER
DISCOUNT COMPANY,

Plaintiff,

CIVIL DIVISION

No. 2007-219-CD

vs.

ROBERT L. DORAN
A/K/A ROBERT L. DORAN JR.,
xxx-xx-7514

127 BELL LANE
WOODLAND, PA 16881

Defendant,

and

CLEARFIELD BANK & TRUST COMPANY
Garnishee.

TO: CLEARFIELD BANK & TRUST COMPANY
11 N 2ND ST
CLEARFIELD, PA 16830

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.

INTERROGATORIES TO GARNISHEE

FIRST: At the time you were served or at any subsequent time did you owe the Defendant any money or were you liable to him/her on any negotiable or other written instrument, or did he/she claim that you owed him/her any money or that you were liable to him/her for any reason:

RESPONSE:

SECOND: If your response to the previous interrogatory was anything other than an unqualified negative, set forth the amount of the claim, and identify the written instrument, if any, that forms the basis of the claim.

RESPONSE:

THIS IS AN ATTEMPT TO
COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL
BE USED FOR THAT PURPOSE.

THIRTEENTH: If you are a bank or other financial institution, at the time you were served or at any subsequent time did the defendant have funds on deposit in an account in which funds are deposited electronically on a recurring basis and which are identified as being funds that upon deposit are exempt from execution, levy or attachment under Pennsylvania or federal law? If so, identify each account and state the reason for the exemption and the entity electronically depositing those funds on a recurring basis

RESPONSE:

FOURTEENTH: If you are a bank or other financial institution, at the time you were served or at any subsequent time did the defendant have funds on deposit in an account in which the funds on deposit, not including any otherwise exempt funds, did not exceed the amount of the general monetary exemption under 42 Pa.C.S. Section 8123? If so, identify each account

RESPONSE:

Respectfully submitted,
CHROMULAK & ASSOCIATES, L.L.C.

DATE: 4-14-08

By: Teresa K. Fuchs
Cathy Ann Chromulak, Esq.
Beth Arnold Howell, Esq.
Teresa K. Fuchs, Esq.
375 Southpointe Boulevard
4th Floor
Canonsburg, PA 15317
(724) 916-2400

**THIS IS AN ATTEMPT TO
COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL
BE USED FOR THAT PURPOSE.**

FILED

APR 25 2008

William A. Shaw
Prothonotary/Clerk of Courts

**COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA**

**BENEFICIAL CONSUMER
DISCOUNT COMPANY**
(Plaintiff)

CIVIL ACTION

TERESA K. FUCHES
Attorney for Plaintiff
(Street Address)
375 Southpointe Blvd.
4th Floor
(City, State, Zip)
Canonsburg, PA 15317

No. 2007-219-CD

Type Case: CIVIL

Type of Pleading: Answers to
Interrogatories

VS.

Filed on Behalf of:
Clearfield Bank & Trust Company

(Garnishee)

ROBERT L. DORAN A/K/A/
ROBERT L. DORAN JR.
(Defendant)

(Filed by)

Lori A. Kurtz
Asst. Vice President & Collection Manager
11 N. 2nd St., P.O. Box 171
Clearfield, PA 16830
(Address)
814-765-7551 or 814-762-8825
(Phone)


(Signature)

FILED
04/28/2008
APR 28 2008 CB/T
6P

William A. Shaw
Prothonotary/Clerk of Courts

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

BENEFICIAL CONSUMER DISCOUNT :
COMPANY : PLAINTIFF :
VS :
ROBERT L. DORAN A/K/A : No. 2007-219-CD :
ROBERT L. DORAN JR. :
DEFENDANT :
AND :
CLEARFIELD BANK & TRUST COMPANY :
GARNISHEE(s) :

To: The Prothonotary of Clearfield County

The Clearfield Bank & Trust Company, Garnishee, files answers to plaintiff's interrogatories as follows:

The answer to the Plaintiff's interrogatories #1 is NO
The answer to the Plaintiff's interrogatories #2 is N/A
The answer to the Plaintiff's interrogatories #3 is NO
The answer to the Plaintiff's interrogatories #4 is N/A
The answer to the Plaintiff's interrogatories #5 is NO
The answer to the Plaintiff's interrogatories #6 is N/A
The answer to the Plaintiff's interrogatories #7 is NO
The answer to the Plaintiff's interrogatories #8 is N/A
The answer to the Plaintiff's interrogatories #9 is NO
The answer to the Plaintiff's interrogatories #10 is N/A
The answer to the Plaintiff's interrogatories #11 is NO
The answer to the Plaintiff's interrogatories #12 is N/A
The answer to the Plaintiff's interrogatories #13 is NO
The answer to the Plaintiff's interrogatories #14 is NO

Date April 28, 2008



Lori A. Kurtz
Assistant Vice President & Collection Manager
Clearfield Bank & Trust Company

FILED

APR 28 2008

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

Beneficial Consumer Discount Company,
Plaintiff,

CIVIL DIVISION

No. 2007-219-CD

vs.

Robert L. Doran a/k/a Robert L. Doran Jr.,

Defendant,

Praeclipe to Discontinue
Against Garnishee ONLY

and

Clearfield Bank & Trust Company,
Garnishee.

TYPE OF CASE:

Civil Action

FILED ON BEHALF OF:

Plaintiff's Address:
2700 Sanders Road
Prospect Heights, IL 60070

Beneficial Consumer Discount Company

COUNSEL OF RECORD:

CATHY ANN CHROMULAK, ESQ.
PA ID NO. 42067

BETH ARNOLD HOWELL, ESQ.
PA ID NO. 203606

TERESA K. FUCHS, ESQ.
PA ID NO. 205696

JENNIFER M. PALONIS, ESQ.
PA ID NO. 205703

CHROMULAK & ASSOCIATES, L.L.C.

375 Southpointe Boulevard
4th Floor
Canonsburg, PA 15317
(724) 916-2400

**THIS IS AN ATTEMPT TO
COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL
BE USED FOR THAT PURPOSE.**

FILED NO CC.
M 10:42 am
JUN 13 2008
WAS

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

Beneficial Consumer Discount Company,
Plaintiff, **CIVIL DIVISION**
No. 2007-219-CD

vs.

Robert L. Doran a/k/a Robert L. Doran Jr.,

Defendant,
and

Clearfield Bank & Trust Company,
Garnishee.

PRAECIPE TO DISCONTINUE AGAINST GARNISHEE ONLY

TO PROTHONOTARY:

Please discontinue this action against the above garnishee, Clearfield Bank & Trust Company
and mark the docket accordingly.

Respectfully submitted,

CHROMULAK & ASSOCIATES, L.L.C.

By: Beth Arnold Howell

CATHY ANN CHROMULAK, ESQ.
BETH ARNOLD HOWELL, ESQ.

TERESA K. FUCHS, ESQ.
JENNIFER M. PALONIS, ESQ.

Attorneys for Plaintiff
375 Southpointe Boulevard
4th Floor
Canonsburg, PA 15317

Sworn to and subscribed
Before me this 10th day
of June, 2008.

Heather L. Hatfield
Notary Public

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal

Heather L. Hatfield, Notary Public
Cecil Twp., Washington County
My Commission Expires June 29, 2010

Member, Pennsylvania Association of Notaries

**THIS IS AN ATTEMPT TO
COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL
BE USED FOR THAT PURPOSE.**

CERTIFICATE OF SERVICE

I, counsel for Beneficial Consumer Discount Company, hereby certify that a true and correct copy of the foregoing Praeclipe to Discontinue Against Garnishee Only was served upon the following by First Class Mail, postage prepaid on this 10th day of June, 2008.

**Robert L. Doran
127 Bell Lane
Woodland PA 16881-9347**

**Clearfield Bank & Trust Company
11 North 2nd Street
Clearfield, PA 16830**

Beth Arnold Howell

Cathy Ann Chromulak, Esq.
Beth Arnold Howell, Esq.
Teresa K. Fuchs, Esq.
Jennifer M. Palonis, Esq.

**THIS IS AN ATTEMPT TO
COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL
BE USED FOR THAT PURPOSE.**

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

BENEFICIAL CONSUMER
DISCOUNT COMPANY,

Plaintiff,

vs.

ROBERT L. DORAN
A/K/A ROBERT L. DORAN JR.,

Defendant,
and

FIRST COMMONWEALTH BANK,

Garnishee.

Plaintiff's Address:
2700 Sanders Road
Prospect Heights, IL 60070

Defendant's Address:
127 BELL LN.
WOODLAND, PA 16881

Garnishee's Address:
14303 CLEARFIELD SHAWVILLE HWY
CLEARFIELD, PA 16830

Date: OCTOBER 31, 2008

CIVIL DIVISION

No. 2007-219-CD

FILED

NOV 03 2008

S, 1, 2008, w/ 6 months

William A. Shaw TO STAFF
Prothonotary/Clerk of Courts

PRAECIPE FOR A WRIT OF
EXECUTION

FILED ON BEHALF OF:

BENEFICIAL CONSUMER
DISCOUNT COMPANY

COUNSEL OF RECORD:

CATHY ANN CHROMULAK, ESQ.
PA ID NO. 42067

BETH ARNOLD HOWELL, ESQ.
PA ID NO. 203606

TERESA K. FUCHS, ESQ.
PA ID NO. 205696

JENNIFER M. PALONIS, ESQ.
PA ID NO. 205703

CHROMULAK & ASSOCIATES, L.L.C.

375 Southpointe Boulevard
4th Floor
Canonsburg, PA 15317
(724) 916-2400

**THIS IS AN ATTEMPT TO
COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL
BE USED FOR THAT PURPOSE.**

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

BENEFICIAL CONSUMER
DISCOUNT COMPANY,

CIVIL DIVISION

No. 2007-219-CD

Plaintiff,

vs.

ROBERT L. DORAN
A/K/A ROBERT L. DORAN JR.,
Defendant,
and

FIRST COMMONWEALTH BANK,

Garnishee.

PRAECIPE FOR WRIT OF EXECUTION

TO: The Prothonotary

Please issue a Writ of Execution in the above matter,

1. directed to the Sheriff of CLEARFIELD County;
2. against ROBERT L. DORAN A/K/A ROBERT L. DORAN JR., defendant, and
3. against FIRST COMMONWEALTH BANK, garnishee,
4. and index this writ
 - a. against ROBERT L. DORAN A/K/A ROBERT L. DORAN JR., defendant, and
 - b. against FIRST COMMONWEALTH BANK, garnishee, and any property of the defendant in the name of Garnishee:

Said Writ of Execution is pursuant to all monies due defendant in any accounts, individual and joint, personal and business.

5.	Amount of Judgment	\$10,330.29
	Additional Interest to Date	\$ 733.95
	(Costs to be added)	\$ _____
	Less	\$ 1,865.49
	Pursuant to Writ of Execution	\$ 9,198.75
	And Service of Writ	Prothonotary costs 172.00

THIS IS AN ATTEMPT TO
COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL
BE USED FOR THAT PURPOSE.

Beth Arnold Howell

CATHY ANN CHROMULAK, ESQ.
BETH ARNOLD HOWELL, ESQ.
TERESA K. FUCHS, ESQ.
JENNIFER M. PALONIS, ESQ.

LAW OFFICES OF William A. Shaw
Prothonotary/Clerk of Courts

NOV 03 2008

FILED

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BENEFICIAL CONSUMER DISCOUNT COMPANY,

Plaintiff,

No. 2007-219-CD

vs.

ROBERT L. DORAN A/K/A ROBERT L. DORAN JR.,

Defendant.

WRIT OF EXECUTION

COMMONWEALTH OF PENNSYLVANIA, COUNTY OF CLEARFIELD

TO THE SHERIFF OF CLEARFIELD, COUNTY, PENNSYLVANIA

To satisfy the judgment, interest and costs against defendant(s) ROBERT L. DORAN a/k/a ROBERT L. DORAN JR.;

(1) ~~You are directed to levy upon the property of the defendant(s) and to sell his, her (or their) interest therein;~~

(2) You are also directed to attach the property of the defendant not levied upon in the possession of FIRST COMMONWEALTH BANK as Garnishee(s) per the following property description:

SAID WRIT OF EXECUTION IS PURSUANT TO ALL MONIES DUE DEFENDANT IN ANY ACCOUNTS, INDIVIDUAL, AND JOINT, PERSONAL AND BUSINESS.
and to notify the Garnishee(s) that

(a) an attachment has been issued;

(b) the garnishee(s) is/are enjoined from paying out 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 not levied upon and subject to attachment is found in the possession of anyone other than the named garnishee(s), you are directed to notify them that they have been added as a garnishee and are enjoined as above stated.

COSTS: Amount Due: \$ 10,330.29

Less \$ 1,865.49

Prothonotary: \$ Interest From: \$ 733.95

Sheriff: \$ TOTAL \$ 9,198.75

Plus costs as per endorsement hereon.

Prothonotary costs ~~+\$ 172.00~~

Prothonotary SEAL


Agent/Deputy

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
NO: 07-219-CD

BENEFICIAL CONSUMER DISCOUNT COMPANY

vs

ROBERT L. DORAN aka ROBERT L. DORAN, JR.
TO: FIST COMMONWEALTH BANK, Garnishee

SERVICE # 1 OF 1

WRIT OF EXECUTION; INTERROGATORIES TO GARNISHEE

SERVE BY: 11/28/2008 ASAP HEARING: PAGE: 104902

DEFENDANT: FIRST COMMONWEALTH BANK, Garnishee
ADDRESS: 14303 CLEARFIELD SHAWVILLE HWY.
CLEARFIELD, PA 16830

5 **FILED**
013:36871
NOV 21 2008

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: GARNISHEE

William A. Shaw
Prothonotary/Clerk of Courts

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT

OCCUPIED

ATTEMPTS

SHERIFF'S RETURN

NOW, 11/21/08 AT 1142 AM PM SERVED THE WITHIN

WRIT OF EXECUTION; INTERROGATORIES TO GARNISHEE ON FIRST COMMONWEALTH BANK, Garnishee,
DEFENDANT

BY HANDING TO Terri Harvath TSR-2

A TRUE AND ATTESTED COPY OF THE ORIGINAL DOCUMENT AND MADE KNOW TO HIM / HER THE CONTENTS
THEREOF.

ADDRESS SERVED 14303 Clfd-Shawville Hwy Clfd

NOW _____ AT _____ AM / PM POSTED THE WITHIN

WRIT OF EXECUTION; INTERROGATORIES TO GARNISHEE FOR FIRST COMMONWEALTH BANK, Garnishee

AT (ADDRESS) _____

NOW _____ AT _____ AM / PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF **NOT FOUND** AS TO FIRST COMMONWEALTH BANK, Garnishee

REASON UNABLE TO LOCATE _____

SWORN TO BEFORE ME THIS

____ DAY OF _____ 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

Deputy S. Hunter
Deputy Signature

Print Deputy Name

FILED

NOV 21 2008

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BENEFICIAL CONSUMER DISCOUNT COMPANY,

Plaintiff,

No. 2007-219-CD

RECEIVED
NOV 24 2008

vs.

ROBERT L. DORAN A/K/A ROBERT L. DORAN JR.,

Defendant.

Answers

FILED NO CC
M 18, 45/87
DEC 01 2008
LAW

William A. Shaw
Prothonotary/Clerk of Courts

WRIT OF EXECUTION

COMMONWEALTH OF PENNSYLVANIA, COUNTY OF CLEARFIELD

TO THE SHERIFF OF CLEARFIELD, COUNTY, PENNSYLVANIA

To satisfy the judgment, interest and costs against defendant(s) ROBERT L. DORAN a/k/a ROBERT L. DORAN JR.;

(1) You are directed to levy upon the property of the defendant(s) and to sell his, her (or their) interest therein;

(2) You are also directed to attach the property of the defendant not levied upon in the possession of FIRST COMMONWEALTH BANK as Garnishee(s) per the following property description:

SAID WRIT OF EXECUTION IS PURSUANT TO ALL MONIES DUE DEFENDANT IN ANY ACCOUNTS, INDIVIDUAL, AND JOINT, PERSONAL AND BUSINESS. and to notify the Garnishee(s) that

(a) an attachment has been issued;

(b) the garnishee(s) is/are enjoined from paying out 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 not levied upon and subject to attachment is found in the possession of anyone other than the named garnishee(s), you are directed to notify them that they have been added as a garnishee and are enjoined as above stated.

COSTS:

Amount Due: \$ 10,330.29

Less \$ 1,865.49

Interest From: \$ 733.95

Prothonotary: \$

TOTAL \$ 9,198.75

Plus costs as per endorsement hereon.

Sheriff: \$

Prothonotary costs 172.00

Received this writ this 4 day
of November A.D. 2008
At 3:00 A.M. (P.M.)

Robert A. Haupas
Sheriff by Mary Haren

Prothonotary SEAL
W. A. Shaw
Agent/Deputy

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

BENEFICIAL CONSUMER
DISCOUNT COMPANY,

Plaintiff,

CIVIL DIVISION

No. 2007-219-CD

vs.

ROBERT L. DORAN
A/K/A ROBERT L. DORAN JR.,
XXX-XX-7514

127 BELL LN.
WOODLAND, PA 16881

Defendant,

and

FIRST COMMONWEALTH BANK
Garnishee.

TO: FIRST COMMONWEALTH BANK
14303 CLEARFIELD SHAWVILLE HWY
CLEARFIELD, PA 16830

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.

INTERROGATORIES TO GARNISHEE

FIRST: At the time you were served or at any subsequent time did you owe the Defendant any money or were you liable to him/her on any negotiable or other written instrument, or did he/she claim that you owed him/her any money or that you were liable to him/her for any reason:

RESPONSE:

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

SECOND: If your response to the previous interrogatory was anything other than an unqualified negative, set forth the amount of the claim, and identify the written instrument, if any, that forms the basis of the claim.

RESPONSE:

**THIS IS AN ATTEMPT TO
COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL
BE USED FOR THAT PURPOSE.**

THIRD: At the time you were served or at any subsequent time, was there in your possession, custody or control or in the joint possession, custody or control of yourself and one or more persons any property of any nature owned solely or in part by the Defendant? The scope of this interrogatory encompasses, but is not restricted to, the contents of any bank account(s).

RESPONSE:

FOURTH: If your response to the previous interrogatory was anything other than an unqualified negative, identify the property, and in the case of monetary assets, state the amount.

RESPONSE:

FIFTH: At the time you were served or at any subsequent time, did you hold legal title to any property of any nature owned solely or in part by the Defendant (or in which Defendant) held or claimed any interest.

RESPONSE:

SIXTH: If your response to the previous interrogatory was anything other than an unqualified negative, identify the property, and in the case of monetary assets, state the amount.

RESPONSE:

SEVENTH: At the time you were served or at any subsequent time, did you hold as a fiduciary any property in which the Defendant had any interest?

RESPONSE:

**THIS IS AN ATTEMPT TO
COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL
BE USED FOR THAT PURPOSE.**

EIGHTH: If your response to the previous interrogatory was anything other than an unqualified negative, identify the property, and in the case of monetary assets, state the amount.

RESPONSE:

NINTH: At any time before or after you were served, did the Defendant transfer or deliver any property to you or to any person or place pursuant to your direction or consent and, if so, what was the consideration therefore?

RESPONSE:

TENTH: If your response to the previous interrogatory was anything other than an unqualified negative, identify the property, and in the case of monetary assets, state the amount, and state the date of the transfer and the name and address of the transferee(s).

RESPONSE:

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

RESPONSE:

TWELFTH: If your response to the previous interrogatory was anything other than an unqualified negative, identify the property, in the case of monetary assets, state the amount, and state the date of transfer and the name and address of the transferee(s).

RESPONSE:

**THIS IS AN ATTEMPT TO
COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL
BE USED FOR THAT PURPOSE.**

THIRTEENTH: If you are a bank or other financial institution, at the time you were served or at any subsequent time did the defendant have funds on deposit in an account in which funds are deposited electronically on a recurring basis and which are identified as being funds that upon deposit are exempt from execution, levy or attachment under Pennsylvania or federal law? If so, identify each account and state the reason for the exemption and the entity electronically depositing those funds on a recurring basis

RESPONSE:

FOURTEENTH: If you are a bank or other financial institution, at the time you were served or at any subsequent time did the defendant have funds on deposit in an account in which the funds on deposit, not including any otherwise exempt funds, did not exceed the amount of the general monetary exemption under 42 PaC.S. Section 8123? If so, identify each account

RESPONSE:

Respectfully submitted,
CHROMULAK & ASSOCIATES, L.L.C.

DATE: October 31, 2008

By: Beth Arnold Howell

Cathy Ann Chromulak, Esq.

Beth Arnold Howell, Esq.

Teresa K. Fuchs, Esq.

Jennifer M. Palonis, Esq.

375 Southpointe Boulevard

4th Floor

Canonsburg, PA 15317

(724) 916-2400

**THIS IS AN ATTEMPT TO
COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL
BE USED FOR THAT PURPOSE.**

EXHIBIT "A"
ANSWERS TO INTERROGATORIES

1. No

2. N/A

3. No

4. N/A

5. No

6. N/A

7. No

8. N/A

9. No

10. N/A

11. No

12. N/A

13. No

14. No

VERIFICATION

COMMONWEALTH OF PENNSYLVANIA)
COUNTY OF INDIANA)

On this 25th day of November 2008 before me, the undersigned officer, a Notary Public in and for said Commonwealth and County, personally appeared JAMES BOYLE, who being duly sworn according to law, acknowledged that he is Vice President of First Commonwealth Bank, and that the facts set forth in the foregoing Interrogatories are true and correct to the best of his knowledge and belief.

James Boyle, Vice President
First Commonwealth Bank

Sworn and subscribed to before me
This 25th day of November 2008

Susan L. Lindenberg
Notary Public

COMMONWEALTH OF PENNSYLVANIA

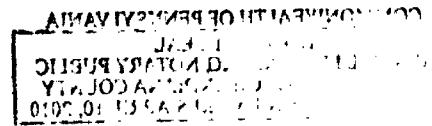
NOTARIAL SEAL.

**SUSAN L LINDENBERG NOTARY PUBLIC
INDIANA BOROUGH, INDIANA COUNTY
MY COMMISSION EXPIRES APRIL 10, 2010**

FILED

DEC 01 2008

William A. Shaw
Prothonotary/Clerk of Courts



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

BENEFICIAL CONSUMER DISCOUNT
COMPANY,

Plaintiff,

vs.

ROBERT L. DORAN A/K/A
ROBERT L. DORAN, JR.,

Defendant,

and

FIRST COMMONWEALTH BANK,
Garnishee.

Plaintiff's Address:
2700 Sanders Road
Prospect Heights, IL 60070

CIVIL DIVISION:

No. 2007-219-CD

TYPE OF PLEADING:

Praeclipe to Settle & Discontinue
Against Garnishee ONLY

TYPE OF CASE:

Civil Action

FILED ON BEHALF OF:

BENEFICIAL CONSUMER DISCOUNT
COMPANY

COUNSEL OF RECORD:

CATHY ANN CHROMULAK, ESQ.
PA ID NO. 42067

BETH ARNOLD HOWELL, ESQ.
PA ID NO. 203606

TERESA K. FUCHS, ESQ.
PA ID NO. 205696

JENNIFER M. PALONIS, ESQ.
PA ID NO. 205703

CHROMULAK & ASSOCIATES, L.L.C.
375 Southpointe Boulevard
4th Floor
Canonsburg, PA 15317
(724) 916-2400

THIS IS AN ATTEMPT TO
COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL
BE USED FOR THAT PURPOSE.

FILED
M 10/02/08 NO CC
DEC 04 2008 (61)

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

BENEFICIAL CONSUMER DISCOUNT
COMPANY,

Plaintiff,

vs.

ROBERT L. DORAN A/K/A
ROBERT L. DORAN, JR.

Defendant,

and

FIRST COMMONWEALTH BANK,
Garnishee.

CIVIL DIVISION:

No. 2007-219-CD

PRAECIPE TO SETTLE & DISCONTINUE AGAINST GARNISHEE ONLY

TO THE PROTHONOTARY:

Please settle & discontinue this action against the above garnishee, FIRST
COMMONWEALTH BANK, and mark the docket accordingly.

Respectfully submitted,

CHROMULAK & ASSOCIATES, L.L.C.

By: Jennifer Palonis
CATHY ANN CHROMULAK, ESQ.
BETH ARNOLD HOWELL, ESQ.
TERESA K. FUCHS, ESQ.
JENNIFER M. PALONIS, ESQ.

Attorneys for Plaintiff
375 Southpointe Boulevard
4th Floor
Canonsburg, PA 15317

Sworn to and subscribed
Before me this 1st day
of December, 2008.

Heather L. Hatfield
Notary Public

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal

Heather L. Hatfield, Notary Public
Cecil Twp., Washington County

My Commission Expires June 29, 2010

Member, Pennsylvania Association of Notaries

THIS IS AN ATTEMPT TO
COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL
BE USED FOR THAT PURPOSE.

CERTIFICATE OF SERVICE

I, counsel for BENEFICIAL CONSUMER DISCOUNT COMPANY, hereby certify that a true and correct copy of the foregoing Praeclipe to Settle & Discontinue Against Garnishee Only was served upon the following by First Class Mail, postage prepaid on this 2ND day of DECEMBER 2008.

FIRST COMMONWEALTH BANK
PHILADELPHIA & 6TH STS., P.O. BOX 400
INDIANA, PA 15701-0400

ROBERT L. DORAN A/K/A
ROBERT L. DORAN, JR.
127 BELL LANE
WOODLAND, PA 16881

Jennifer Palonis

Cathy Ann Chromulak, Esq.
Beth Arnold Howell, Esq.
Teresa K. Fuchs, Esq.
Jennifer M. Palonis, Esq.

**THIS IS AN ATTEMPT TO
COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL
BE USED FOR THAT PURPOSE.**

FILED

DEC 04 2008

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104902
NO: 07-219-CD
SERVICES 1
WRIT OF EXECUTION; INTERROGATORIES TO

GARNISHEE

PLAINTIFF: BENEFICIAL CONSUMER DISCOUNT COMPANY

vs.

DEFENDANT: ROBERT L. DORAN aka ROBERT L. DORAN, JR.
TO: FIST COMMONWEALTH BANK, Garnishee

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	CHROMULAK	3926	10.00
SHERIFF HAWKINS	CHROMULAK	3926	20.00

S
FILED
01/50 cm
DEC 09 2008
LSA
William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

So Answers,

____ Day of _____ 2008



Chester A. Hawkins
Sheriff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BENEFICIAL CONSUMER DISCOUNT COMPANY,

Plaintiff,

No. 2007-219-CD

vs.

ROBERT L. DORAN A/K/A ROBERT L. DORAN JR.,

Defendant.

WRIT OF EXECUTION

COMMONWEALTH OF PENNSYLVANIA, COUNTY OF CLEARFIELD

TO THE SHERIFF OF CLEARFIELD, COUNTY, PENNSYLVANIA

To satisfy the judgment, interest and costs against defendant(s) ROBERT L. DORAN a/k/a ROBERT L. DORAN JR.;

(1) ~~You are directed to levy upon the property of the defendant(s) and to sell his, her (or their) interest therein;~~

(2) You are also directed to attach the property of the defendant not levied upon in the possession of FIRST COMMONWEALTH BANK as Garnishee(s) per the following property description:

SAID WRIT OF EXECUTION IS PURSUANT TO ALL MONIES DUE DEFENDANT IN ANY ACCOUNTS, INDIVIDUAL, AND JOINT, PERSONAL AND BUSINESS.
and to notify the Garnishee(s) that

(a) an attachment has been issued;

(b) the garnishee(s) is/are enjoined from paying out 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 not levied upon and subject to attachment is found in the possession of anyone other than the named garnishee(s), you are directed to notify them that they have been added as a garnishee and are enjoined as above stated.

COSTS:

Amount Due: \$ 10,330.29

Less \$ 1,865.49

Interest From: \$ 733.95

Prothonotary: \$

TOTAL \$ 9,198.75

Plus costs as per endorsement hereon.

Received this writ this 4 day
of Nov. A.D. 2007
At 3:00 A.M./P.M.

Prothonotary costs 112.00

Prothonotary SEAL

Chester A. Hanus
Sheriff by Mallyn Hanus

Willie
Agent/Deputy

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

BENEFICIAL CONSUMER DISCOUNT COMPANY,

Plaintiff,

No. 2007-219-CD

vs.

ROBERT L. DORAN A/K/A ROBERT L. DORAN JR.,

Defendant.

WRIT OF EXECUTION

COMMONWEALTH OF PENNSYLVANIA, COUNTY OF CLEARFIELD

TO THE SHERIFF OF CLEARFIELD, COUNTY, PENNSYLVANIA

To satisfy the judgment, interest and costs against defendant(s) ROBERT L. DORAN a/k/a ROBERT L. DORAN JR.;

(1) ~~You are directed to levy upon the property of the defendant(s) and to sell his, her (or their) interest therein;~~

(2) You are also directed to attach the property of the defendant not levied upon in the possession of FIRST COMMONWEALTH BANK as Garnishee(s) per the following property description:

SAID WRIT OF EXECUTION IS PURSUANT TO ALL MONIES DUE DEFENDANT IN ANY ACCOUNTS, INDIVIDUAL, AND JOINT, PERSONAL AND BUSINESS.
and to notify the Garnishee(s) that

(a) an attachment has been issued;

(b) the garnishee(s) is/are enjoined from paying out 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 not levied upon and subject to attachment is found in the possession of anyone other than the named garnishee(s), you are directed to notify them that they have been added as a garnishee and are enjoined as above stated.

COSTS:

Amount Due: \$ 10,330.29

Less \$ 1,865.49

Interest From: \$ 733.95

Prothonotary: \$

TOTAL \$ 9,198.75

Plus costs as per endorsement hereon.

Sheriff: \$

Prothonotary costs \$ 172.00

Received this writ this 4 day
of July. A.D. 2008
At 3:00 A.M. (P.M.)

Chet A. Hawley
Sheriff by Marly Hahn

Prothonotary SEAL

Weller
Agent/Deputy

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

BENEFICIAL CONSUMER
DISCOUNT COMPANY,

CIVIL DIVISION

Plaintiff,

No. 2007-219-CD

vs.

ROBERT L. DORAN
A/K/A ROBERT L. DORAN JR.,
XXX-XX-7514

127 BELL LN.
WOODLAND, PA 16881

Defendant,

and

FIRST COMMONWEALTH BANK
Garnishee.

TO: FIRST COMMONWEALTH BANK
14303 CLEARFIELD SHAWVILLE HWY
CLEARFIELD, PA 16830

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.

INTERROGATORIES TO GARNISHEE

FIRST: At the time you were served or at any subsequent time did you owe the Defendant any money or were you liable to him/her on any negotiable or other written instrument, or did he/she claim that you owed him/her any money or that you were liable to him/her for any reason:

RESPONSE:

SECOND: If your response to the previous interrogatory was anything other than an unqualified negative, set forth the amount of the claim, and identify the written instrument, if any, that forms the basis of the claim.

RESPONSE:

**THIS IS AN ATTEMPT TO
COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL
BE USED FOR THAT PURPOSE.**

THIRD: At the time you were served or at any subsequent time, was there in your possession, custody or control or in the joint possession, custody or control of yourself and one or more persons any property of any nature owned solely or in part by the Defendant? The scope of this interrogatory encompasses, but is not restricted to, the contents of any bank account(s).

RESPONSE:

FOURTH: If your response to the previous interrogatory was anything other than an unqualified negative, identify the property, and in the case of monetary assets, state the amount.

RESPONSE:

FIFTH: At the time you were served or at any subsequent time, did you hold legal title to any property of any nature owned solely or in part by the Defendant (or in which Defendant) held or claimed any interest.

RESPONSE:

SIXTH: If your response to the previous interrogatory was anything other than an unqualified negative, identify the property, and in the case of monetary assets, state the amount.

RESPONSE:

SEVENTH: At the time you were served or at any subsequent time, did you hold as a fiduciary any property in which the Defendant had any interest?

RESPONSE:

**THIS IS AN ATTEMPT TO
COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL
BE USED FOR THAT PURPOSE.**

EIGHTH: If your response to the previous interrogatory was anything other than an unqualified negative, identify the property, and in the case of monetary assets, state the amount.

RESPONSE:

NINTH: At any time before or after you were served, did the Defendant transfer or deliver any property to you or to any person or place pursuant to your direction or consent and, if so, what was the consideration therefore?

RESPONSE:

TENTH: If your response to the previous interrogatory was anything other than an unqualified negative, identify the property, and in the case of monetary assets, state the amount, and state the date of the transfer and the name and address of the transferee(s).

RESPONSE:

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

RESPONSE:

TWELFTH: If your response to the previous interrogatory was anything other than an unqualified negative, identify the property, in the case of monetary assets, state the amount, and state the date of transfer and the name and address of the transferee(s).

RESPONSE:

**THIS IS AN ATTEMPT TO
COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL
BE USED FOR THAT PURPOSE.**

THIRTEENTH: If you are a bank or other financial institution, at the time you were served or at any subsequent time did the defendant have funds on deposit in an account in which funds are deposited electronically on a recurring basis and which are identified as being funds that upon deposit are exempt from execution, levy or attachment under Pennsylvania or federal law? If so, identify each account and state the reason for the exemption and the entity electronically depositing those funds on a recurring basis

RESPONSE:

FOURTEENTH: If you are a bank or other financial institution, at the time you were served or at any subsequent time did the defendant have funds on deposit in an account in which the funds on deposit, not including any otherwise exempt funds, did not exceed the amount of the general monetary exemption under 42 Pa.C.S. Section 8123? If so, identify each account

RESPONSE:

Respectfully submitted,
CHROMULAK & ASSOCIATES, L.L.C.

DATE: October 31, 2008

By: Beth Arnold Howell
Cathy Ann Chromulak, Esq.
Beth Arnold Howell, Esq.
Teresa K. Fuchs, Esq.
Jennifer M. Palonis, Esq.
375 Southpointe Boulevard
4th Floor
Canonsburg, PA 15317
(724) 916-2400

**THIS IS AN ATTEMPT TO
COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL
BE USED FOR THAT PURPOSE.**

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

**BENEFICIAL CONSUMER
DISCOUNT COMPANY,**

Plaintiff,

vs.

**ROBERT L. DORAN
A/K/A ROBERT L. DORAN JR.,**

Defendant,

FIRST COMMONWEALTH BANK,

Garnishee.

Plaintiff's Address:
2700 Sanders Road
Prospect Heights, IL 60070

CIVIL DIVISION

No. 2007-219-CD

TYPE OF PLEADING:

Claim for Exemption

TYPE OF CASE:

Civil Action

FILED ON BEHALF OF:

**BENEFICIAL CONSUMER
DISCOUNT COMPANY**

COUNSEL OF RECORD:

CATHY ANN CHROMULAK, ESQ.
PA ID NO. 42067
BETH ARNOLD HOWELL, ESQ.
PA ID NO. 203606
TERESA K. FUCHS, ESQ.
PA ID NO. 205696
JENNIFER M. PALONIS, ESQ.
PA ID NO. 205703

CHROMULAK & ASSOCIATES, L.L.C.

375 Southpointe Boulevard
4th Floor
Canonsburg, PA 15317
(724) 916-2400

**THIS IS AN ATTEMPT TO
COLLECT A DEBT AND ANY
INFORMATION OBTAINED WILL
BE USED FOR THAT PURPOSE.**

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

**BENEFICIAL CONSUMER
DISCOUNT COMPANY,**

Plaintiff,
Vs.

CIVIL DIVISION

No. 2007-219-CD

**ROBERT L. DORAN
A/K/A ROBERT L. DORAN JR.,**
Defendant,
and

**FIRST COMMONWEALTH BANK,
Garnishee.**

**WRIT OF EXECUTION
NOTICE**

This paper is a "Writ of Execution". It has been issued because there is a judgment against you. It may cause your property to be held or taken to pay the judgment. You may have legal rights to prevent your property from being taken. A lawyer can advise you more specifically of these rights. If you wish to exercise your rights, you must act promptly.

The law provides that certain property cannot be taken and sold by the Sheriff to satisfy your debts. **SUCH PROPERTY IS SAID TO BE EXEMPT**. No matter what you owe, there is a **DEBTOR'S EXEMPTION** established by law. This means that no matter what happens, the Sheriff must give you from the sale at least \$300.00 in cash or property. There are also other exemptions that may be applicable to you. Listed below is a summary of some of the major exemptions that may be applicable to you. If you have an exemption, you should do the following promptly:

1. Complete the claim form attached hereto, and demand a prompt hearing.
2. Deliver the form or mail it to the Sheriff's office at the address noted.

You should come to Court when and where you are told to appear ready to explain your exemption. **IF YOU DO NOT COME TO COURT AND PROVE YOUR EXEMPTION, YOU MAY LOSE SOME OF YOUR PROPERTY.**

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.

**CLEARFIELD COUNTY LAWYER REFERRAL
DAVID S. MEHOLIK, COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
CLEARFIELD, PA 16830**

CLAIM FOR EXEMPTION

TO THE SHERIFF:

We, the above-named Defendant(s), claim exemption of property from levy or attachment:

1. FROM MY PERSONAL PROPERTY IN MY POSSESSION WHICH HAS BEEN LEVIED UPON:
 - a. I desire that my statutory \$300.00 exemption be:
[] (1) set aside of kind (specify property to be set aside in kind):

[] (2) paid in cash following the sale of the property levied upon;

OR

b. I claim the following exemption: (specify property and basis or exemption):

2. FROM MY PROPERTY WHICH IS IN THE POSSESSION OF A THIRD PARTY, I CLAIM THE FOLLOWING EXEMPTIONS:

a. My \$300.00 STATUTORY EXEMPTION: [] in cash [] in kind (specify property):

b. Social Security benefits on deposit in the amount of
\$ _____;

c. Other (specify amount and basis for exemption):

I request a prompt Court Hearing to determine the exemption. Notice of the Hearing should be given me at the following:

(Address)

(Telephone Number)

I verify that the statements made in this Claim for Exemption are true and correct. I understand that false statements herein are made subject to the penalties of 18 P.A.C.S. § 4904 relating to unsworn falsification to authorities.

Date: _____

Defendant: _____

Date: _____

Defendant: _____

THIS CLAIM TO BE FILED WITH:

CLEARFIELD COUNTY SHERIFF'S OFFICE
P.O. BOX 549
CLEARFIELD, PA 16830
814-765-2641

Note: Under paragraphs (1) and (2) of the Writ, a description of specific property to be levied upon or attached may be set forth in the Writ or included in separate direction to the Sheriff.

Under paragraph (2) of the Writ, if attachment of a named Garnishee is desired, his name should be set forth in the space provided.

Under paragraph (3) of the Writ, the Sheriff may, as under prior practice, add as a Garnishee any person not named in this Writ who may be found in possession of property of the Defendant(s). See Rule 3111(a). For limitations on the power to attach tangible personal property, see Rule 3108(a). (b) Each Court shall, by local rule, designate the officer organization or person to be named in the notice.

FILED

DEC 09 2008

William A. Shaw
Prothonotary/Clerk of Courts