

07-311-CD
Edward Scott et al vs Sykes Co Cons.

Edward Scott et al vs Syker-Co Consumer
2007-311-CD

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

EDWARD W. SCOTT and : No. 2007-311-~~8~~CD
Suzanne M. SCOTT, :
Plaintiffs : Type of Pleading:
Vs. : **COMPLAINT**
: Filed on Behalf of:
SYKES-CO, CONSUMER DISCOUNT : PLAINTIFFS
COMPANY, INC., :
Defendant : Counsel of Record for This Party:
: Jeffrey S. DuBois, Esquire
: Supreme Court No. 62074
: 190 West Park Avenue, Suite #5
: DuBois, PA 15801
: (814) 375-5598

FILED *W.A.S.*

MAR 02 2007

0/10/07
William A. Shaw
Prothonotary/Clerk of Courts

3 copy to Attn

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

EDWARD W. SCOTT and : No. _____
SUZANNE M. SCOTT, :
Plaintiffs :
Vs. :
SYKES-CO CONSUMER DISCOUNT :
COMPANY, INC., :
Defendant :
:

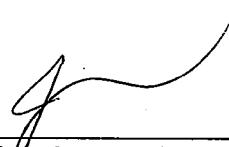
NOTICE

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, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Clearfield County Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
(814) 765-2641



Jeffrey S. DuBois, Esquire
Attorney for Plaintiff

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

EDWARD W. SCOTT and : No. _____
SUZANNE M. SCOTT, :
Plaintiffs :
Vs. :
SYKES-CO CONSUMER DISCOUNT :
COMPANY, INC., :
Defendant :
.

COMPLAINT

AND NOW, comes the Plaintiffs, Edward W. Scott and Suzanne M. Scott, by and through their attorney, Jeffrey S. DuBois, Esquire, who files this Complaint and in support thereof avers the following:

1. Plaintiffs, are adult individuals, Husband and Wife, residing in Treasure Lake, Sandy Township, Clearfield County, Pennsylvania.
2. Defendant, Sykes-Co Consumer Discount Company, Inc., is a company with a business address of Box 63, 6 North Ethel Street, Sykesville, Clearfield County, Pennsylvania.
3. Jurisdiction is proper before this Honorable Court as this is a Quite Title Action involving real property located in Clearfield County, Pennsylvania.
4. Plaintiff's, in July of 2005, purchased property in the Treasure Lake subdivision, Sandy Township, Clearfield County, Pennsylvania, specifically, Section 7C, Lot 213, within the Treasure Lake Subdivision.

5. Said property was received from a deed from John J. Bellomo and Michelle M. Bellomo, in a deed dated July 5, 2005, and recorded on July 26, 2005, to instrument Number 200511383. A copy of said deed is attached hereto and made a part hereof as Exhibit "A".

6. The prior Grantors, the Bellomo's, referenced above, purchased this property through a tax claim sale, under tax claim number 94-6246.

7. Specifically, the Bellomo's received this property from the Tax Claim Bureau, on August 19, 1999, at Instrument 199913715. A copy of the deed from Tax Claim is attached hereto and made a part here of as Exhibit "B".

8. The subject of the property, which was received by the Bellomo's in 1999, was from Tax Claim as the result of Defendant, Sykes-Co Consumer Discount Company, Inc., the previous owner of said property for not paying the taxes owed on said property for several years, and as a consequence, the said property, reverted back to the Tax Claim Bureau.

9. After some time of the property being in the Tax Claim Bureau, it was set for a tax claim sale to which the Bellomo's purchased said property as herein stated.

10. The Tax Claim Bureau complied with all requirements obligated by it under the statutes, and all proper notices were sent out, to include the Defendant.

11. The prior owners, the Bellomo's, received proper title and rightful ownership to this property by virtue of the Deed from and purchase from the Tax Claim Bureau referenced herein.

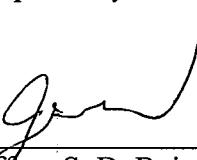
12. The Bellomo's held the property until 2005, and paid all taxes owed on said property, until it was sold to Plaintiff's in July 2005.

13. Since July 2005, until the present time, Plaintiff's have exercised full ownership over said property, paid all property taxes, and are the rightful owners of said property.

14. Plaintiffs, therefore, so as to clear any defects in title on their property, if any, request this Honorable Court to enter an Order declaring them the rightful owners of the aforementioned property, and to deny Defendant the right to claim any right, lien, title, or interest in the subject property.

WHEREFORE, Plaintiffs request this Honorable Court to (a) enter an order declaring them the rightful owners of the subject property; (b) enter an order declaring that Defendant, Sykes-Co Consumer Discount Company, Inc., its successors, and assigns, are barred from asserting any right, lien, title, or interest in the subject property based on the deed set forth in the Complaint; (c) such other relief as deemed just and equitable.

Respectfully submitted,

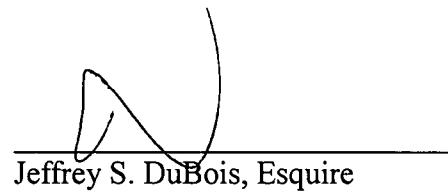


Jeffrey S. DuBois, Esquire
Attorney for Plaintiffs

VERIFICATION

I, JEFFREY S. DUBOIS, Esquire, verify that the statements in the foregoing Complaint are true and correct to the best of my knowledge, information and belief. The undersigned is in possession of this information based on conversations with and representation of Defendant. Defendant is currently unavailable and a signed verification by Defendant will be submitted as soon as Defendant is in contact with the undersigned.

This statement and verification is made subject to the penalties of 18 Pa.C.S. 4904 relating to unsworn falsification to authorities, which provides that if I make knowingly false averments, I may be subject to criminal penalties.



Jeffrey S. DuBois, Esquire

EXHIBIT "A"

THIS DEED,

MADE the 5 day of July in the year two thousand five (2005)

BETWEEN **JOHN J. BELLOMO** a/k/a **JOHN BELLOMO** and **MICHELE M. BELLOMO** a/k/a **MICHELE BELLOMO**, husband and wife, of Treasure Lake, DuBois, Pennsylvania, Parties of the First Part and **GRANTORS**,

-AND-

EDWARD W. SCOTT and **SUZANNE M. SCOTT**, husband and wife, of Prattville, Alabama, Parties of the Second Part and **GRANTEEES**;

WITNESSETH, That in consideration of the sum of Two Hundred Fifty Seven Thousand and 00/100 (\$257,000.00) Dollars, the said Grantors do hereby grant and convey to the said Grantees,

ALL that certain tract of land designated as Lot No. 213 and Lot No. 214, Section No. 7C, in the Treasure Lake Subdivision in Sandy Township, Clearfield County, Pennsylvania, in the Recorder of Deeds Office in Miscellaneous Docket No. 25.

Excepting and reserving therefrom and subject to:

1. All easements, rights of way, reservations, restrictions and limitations shown or contained in prior instruments of record and in the aforesaid recorded plan.
2. The Declaration of Restrictions, Treasure Lake of Pennsylvania, Inc., recorded in Misc. Book Vol. 146, p. 476.
3. All mineral and mining rights of every kind and nature.
4. A lien for all unpaid charges or assessments as may be made by Grantor or Treasure Lake Property Owners Association, Inc.; which lien shall run with the land and be an encumbrance against it.

BEING the same premises conveyed to the above named Grantors, by Repository Deed of The Tax Claim Bureau of Clearfield County, Pennsylvania, Trustee, dated August 19, 1999, and recorded in the Recorder of Deeds of Clearfield County, Pennsylvania, on August 19, 1999, to Instrument No. 199913715. Also described as Lot 213, Section 7C.

BEING the same premises conveyed to the above named Grantors, by deed of James J. Hanslovan and Susan L. Hanslovan dated November 9, 1998, and recorded in the Recorder of Deeds of Clearfield County, Pennsylvania, on November 9, 1998, to Instrument No. 199820352. Also described as Lot 214, Section 7C.

THE GRANTORS HEREIN STATES THAT THE HEREINABOVE DESCRIBED PROPERTY IS NOT PRESENTLY BEING USED FOR THE DISPOSAL OF HAZARDOUS WASTE NOR TO THE BEST OF HIS/HER/THEIR KNOWLEDGE, INFORMATION AND BELIEF HAS IT EVER BEEN USED FOR THE DISPOSAL OF HAZARDOUS WASTE. THIS STATEMENT IS MADE IN COMPLIANCE WITH THE SOLID WASTE MANAGEMENT ACT NO. 1980-97, SECTION 405.

AND the said Grantors will **SPECIALLY WARRANT** the property hereby conveyed.

IN WITNESS WHEREOF, said Grantors have hereunto set their hands and seals, the day and year first above written.


John Bellomo
a/k/a John J. Bellomo


Michele Bellomo
a/k/a Michele M. Bellomo

Commonwealth of Pennsylvania

SS:

County of Clearfield

On this, the 5 day of July, 2005 before me the undersigned officer, a notary public, personally appeared JOHN J. BELLOMO a/k/a JOHN BELLOMO, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that he executed the same for the purpose therein contained.

IN WITNESS WHEREOF, I have hereunto set my hand and official seal.



Notary Public

NOTARIAL SEAL
TAMRA L. MCCLINTICK, NOTARY PUBLIC
CITY OF DUBOIS, CLEARFIELD COUNTY
MY COMMISSION EXPIRES SEPT. 24, 2007

Commonwealth of Pennsylvania

SS:

County of Clearfield

On this, the 5 day of July, 2005 before me the undersigned officer, a notary public, personally appeared MICHELE M. BELLOMO a/k/a MICHELE BELLOMO, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that she executed the same for the purpose therein contained.

IN WITNESS WHEREOF, I have hereunto set my hand and official seal.



Notary Public

NOTARIAL SEAL
TAMRA L. MCCLINTICK, NOTARY PUBLIC
CITY OF DUBOIS, CLEARFIELD COUNTY
MY COMMISSION EXPIRES SEPT. 24, 2007

NOTICE

In accordance with the provisions of "The Bituminous Mine Subsidence and Land Conservation Act of 1966", I/we, the undersigned grantee/grantees, hereby certify that I/we know and understand that I/we may not be obtaining the right of protection against subsidence resulting from coal mining operations and that the purchased property may be protected from damage due to mine subsidence by a private contract with the owners of the economic interest in the coal. I/we further certify that this certification is in a color contrasting with that in the deed proper and is printed in twelve point type preceded by the word "notice" printed in twenty-four point type.

Witness:

Edward W. Scott

Suzanne M. Scott

This _____ day of _____.

THIS DOCUMENT MAY NOT SELL, CONVEY, TRANSFER, INCLUDE OR INSURE THE TITLE OF THE COAL AND RIGHT OF SUPPORT UNDERNEATH THE SURFACE LAND DESCRIBED OR REFERRED TO HEREIN, AND THE OWNER OR OWNERS OF SUCH COAL MAY HAVE THE COMPLETE LEGAL RIGHT TO REMOVE ALL OF SUCH COAL AND, IN THAT CONNECTION, DAMAGE MAY RESULT TO THE SURFACE OF THE LAND AND ANY HOUSE, BUILDING OR STRUCTURE ON OR IN SUCH LAND. THE INCLUSION OF THIS NOTICE DOES NOT ENLARGE, RESTRICT OR MODIFY ANY LEGAL RIGHTS OR ESTATES OTHERWISE CREATED, TRANSFERRED, EXCEPTED OR RESERVED BY THIS INSTRUMENT. (This Notice is set forth pursuant to Act No. 255, approved September 10, 1965, as amended.)

CERTIFICATE OF RESIDENCE

I/we hereby certify, that the precise residence for the Grantee herein is as follows:
102 Timberrill Court, Prattville, AL 36066

Attorney or Agent for Grantee

EXHIBIT "B"

REPOSITORY DEED

AFFIDAVIT No: 30945

THIS DEED made this 19th day of August in the year of our Lord, One Thousand Nine Hundred and Ninety Nine (1999), BETWEEN THE TAX CLAIM BUREAU OF CLEARFIELD COUNTY, PENNSYLVANIA, Trustee under the provisions of the Act of July 7, 1947, P.L. 1368, and amendments thereto, hereinafter referred to as "Grantor".

JOHN J. BELLOMO
AND
MICHELE M. BELLOMO

hereinafter referred to as "grantees".

WHEREAS, the hereinafter described premises were assessed in the name of SYKES-CO, INC. where as taxes were levied which were not paid and which are delinquent; and

WHEREAS, the said delinquent taxes against the said property were filed in the office of the Tax Claim Bureau of Clearfield County, Pennsylvania; and

WHEREAS, after proceeding under the provision of the Act aforesaid, the Tax Claim Bureau did expose the said premises to a tax sale on September 14, 1993, but said premises were not sold at said sale; and

WHEREAS, pursuant to the Act of 1947 P.L. 1368, No. 542, as amended by P.L. 351, No. 81, and Order of Court dated December 28, 1994., filed as M.D. 10 Page 44, said premises were exposed to public Judicial Sale on February 3, 1995; and

WHEREAS, said premises having remained unsold, under provision of the aforesaid Act it was placed in a "Repository For Unsold Properties".

WHEREAS, the said premises were sold at private "REPOSITORY" sale to JOHN J. BELLOMO AND MICHELE M. BELLOMO, for the sum of One Hundred Dollars (\$100.00).

NOW THIS INDENTURE WITNESSETH, that for and in consideration of the sum of One Hundred Dollars (\$100.00), the receipt whereof is hereby acknowledged, the Grantor does hereby grant and convey unto the said Grantee, his heirs, successors or assigns, the following described property, to wit:

SANDY TOWNSHIP
LOT 213 SECTION 7C
128-C02-07C-00213-00-21

Being the same property offered at Judicial Sale, in accordance with the provisions of the Act of Assembly hereinbefore recited, as the property of SYKES-CO, INC. under tax claim # 94-6246.

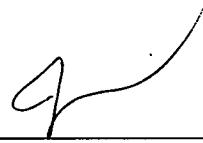
IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

EDWARD W. SCOTT and : No. _____
Suzanne M. SCOTT, :
Plaintiffs :
Vs. :
SYKES-CO CONSUMER DISCOUNT :
COMPANY, INC., :
Defendant :
:

CERTIFICATE OF SERVICE

I do hereby certify that on the 21 day of ^{March} February, 2007, I served a true and correct copy of the within Complaint by first class mail, postage prepaid, on the following:

Sykes-Co Consumer Discount Co., Inc.
c/o Anthony M. Zaffuto
3547 Watson Highway
DuBois, PA 15801



Jeffrey S. DuBois
Attorney for Plaintiff

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

EDWARD W. SCOTT and : No. 2007-311-CD
SUZANNE M. SCOTT, :
Plaintiffs : Type of Pleading:
Vs. : **CONSENT TO ENTER
JUDGMENT**
: Filed on Behalf of:
SYKES-CO, CONSUMER DISCOUNT : PLAINTIFFS
COMPANY, INC., :
Defendant : Counsel of Record for This Party:
: Jeffrey S. DuBois, Esquire
: Supreme Court No. 62074
: 190 West Park Avenue, Suite #5
: DuBois, PA 15801
: (814) 375-5598

FILED
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MAR 15 2007
2cc
Attn:
DeBois
William A. Shaw
Prothonotary/Clerk of Courts
GK

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

EDWARD W. SCOTT and : No. 2007-311-CD
Suzanne M. SCOTT, :
Plaintiffs :
Vs. :
SYKES-CO CONSUMER DISCOUNT :
COMPANY, INC., :
Defendant :
:

CONSENT TO ENTER JUDGMENT

Sykes-Co Consumer Discount Co., Inc., Defendant herein to the above captioned term and number, hereby states and affirms that it acknowledges it has no interest nor title to the real property which is the subject matter of this litigation, specifically Section 7C, Lot 213, in the Treasure Lake Subdivision in Sandy Township, Clearfield County, and Defendant further states that it consents to a ruling from this Honorable Court setting forth that it has no right, title, or interest in said property.

Defendant makes this statement this 12 day of March, 2007.

Sykes-Co Consumer Discount Co., Inc.

By: Anthony M. Zaffuto
Anthony M. Zaffuto, President

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

EDWARD W. SCOTT and : No. 2007-311-CD
SUZANNE M. SCOTT, :
Plaintiffs : Type of Pleading:
Vs. : **PETITION TO ENTER
JUDGMENT**
: Filed on Behalf of:
SYKES-CO, CONSUMER DISCOUNT : PLAINTIFFS
COMPANY, INC., :
Defendant : Counsel of Record for This Party:
: Jeffrey S. DuBois, Esquire
: Supreme Court No. 62074
: 190 West Park Avenue, Suite #5
: DuBois, PA 15801
: (814) 375-5598

FILED *2cc*
M T O O D Atty DuBois
MAR 19 2007



William A. Shaw
Prothonotary/Clerk of Courts

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

EDWARD W. SCOTT and : No. 2007-311-CD
SUZANNE M. SCOTT, :
Plaintiffs :
: Vs. :
: :
SYKES-CO CONSUMER DISCOUNT :
COMPANY, INC., :
Defendant :
:

ORDER

AND NOW, this 19 day of March, 2007, based upon Plaintiffs' Complaint for Quiet Title, and in consideration of Defendant's executed Consent to Enter Judgment, whereby Defendant acknowledges it no longer has any interest or title to the subject property, and consents to the same; therefore,

IT IS HEREBY ORDERED AND DECREED, that Defendant, its successors and assigns, is forever barred from asserting any right, title, lien, or interest in the property in the Treasure Lake Subdivision, Section 7C, Lot 213, Sandy Township, Clearfield County, and Plaintiffs are the rightful owners of said property.

BY THE COURT



Judge

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MAR 19 2007 AttyDeBois
(6K)

William A. Shaw
Prothonotary/Clerk of Courts

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

EDWARD W. SCOTT and	:	No. 2007-311-CD
SUZANNE M. SCOTT,	:	
Plaintiffs	:	
	:	
Vs.	:	
	:	
SYKES-CO CONSUMER DISCOUNT	:	
COMPANY, INC.,	:	
Defendant	:	

PETITION TO ENTER JUDGMENT

AND NOW, comes the Plaintiffs, Edward and Suzanne Scott, by and through their attorney, Jeffrey S. DuBois, Esquire, who files this Petition to Enter Judgment and in support thereof avers the following:

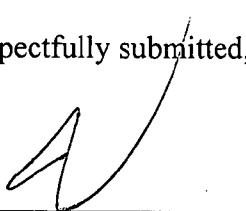
1. Plaintiffs have filed a Complaint in Action to Quiet Title against Defendant in the above captioned term and number.
2. The property relates to a lot located in the Treasure Lake Subdivision, Sandy Township, Clearfield County, Pennsylvania.
3. Defendants lost the property through a tax sale in 1999, and since that time there have been two different owners for said property.
4. For Title purposes, Plaintiffs have filed this action to clear up any clouds in the title with respect to said property.
5. Defendants do not claim any ownership or interest to said property, and have filed a Consent to that effect and they consent to enter into a Judgment against them. A

copy of said Consent to Enter Judgment is attached hereto and made a part hereof as Exhibit "A".

6. Because of the fact Plaintiffs are the rightful owners of said property, and Defendants claim no interest nor right or title to said property, and further consent to Judgment being entered against them with respect to said property, Plaintiffs respectfully request this Honorable Court to enter Judgment in favor of Plaintiffs with respect to said property.

WHEREFORE, Plaintiffs respectfully request this Honorable Court to enter an Order denying Defendants any right, title, or interest in said property and claiming Plaintiffs the rightful owners of said property.

Respectfully submitted,



Jeffrey S. DuBois, Esquire
Attorney for Plaintiffs

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

EDWARD W. SCOTT and SUZANNE M. SCOTT,	:	No. 2007-311-CD
	:	Plaintiffs
Vs.	:	Type of Pleading:
	:	CONSENT TO ENTER JUDGMENT
SYKES-CO, CONSUMER DISCOUNT COMPANY, INC.,	:	Filed on Behalf of: PLAINTIFFS
	:	Defendant
	:	Counsel of Record for This Party:
	:	Jeffrey S. DuBois, Esquire
	:	Supreme Court No. 62074
	:	190 West Park Avenue, Suite #5
	:	DuBois, PA 15801
	:	(814) 375-5598

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

MAR 15 2007

Attest.

William L. Green
Prothonotary/
Clerk of Courts

EXHIBIT "A"

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

EDWARD W. SCOTT and : No. 2007-311-CD
SUZANNE M. SCOTT, :
Plaintiffs :
Vs. :
SYKES-CO CONSUMER DISCOUNT :
COMPANY, INC., :
Defendant :
:

CONSENT TO ENTER JUDGMENT

Sykes-Co Consumer Discount Co., Inc., Defendant herein to the above captioned term and number, hereby states and affirms that it acknowledges it has no interest nor title to the real property which is the subject matter of this litigation, specifically Section 7C, Lot 213, in the Treasure Lake Subdivision in Sandy Township, Clearfield County, and Defendant further states that it consents to a ruling from this Honorable Court setting forth that it has no right, title, or interest in said property.

Defendant makes this statement this 12 day of March, 2007.

Sykes-Co Consumer Discount Co., Inc.

By: Anthony M. Zaffuto
Anthony M. Zaffuto, President

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

EDWARD W. SCOTT and : No. 2007-311-CD
SUZANNE M. SCOTT, :
Plaintiffs : Type of Pleading:
Vs. : **ACCEPTANCE OF SERVICE**
SYKES-CO, CONSUMER DISCOUNT :
COMPANY, INC., : Filed on Behalf of:
Defendant : PLAINTIFFS
: Counsel of Record for This Party:
: Jeffrey S. DuBois, Esquire
: Supreme Court No. 62074
: 190 West Park Avenue, Suite #5
: DuBois, PA 15801
: (814) 375-5598

FILED NO CC
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MAR 21 2007
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William A. Shaw
Prothonotary/Clerk of Courts

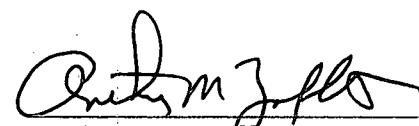
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SYKES-CO, CONSUMER DISCOUNT :
COMPANY, INC., :
Defendant :
:

ACCEPTANCE OF SERVICE

I, ANTHONY M. ZAFFUTO, for Sykes-co Consumer Discount Co., Inc.,
Defendant in the foregoing Complaint action hereby accept service of the Complaint on
the date set forth below filed with the Prothonotary on March 2, 2007.

Date: 3-12-07


Anthony M. Zaffuto
For Sykes-Co Consumer
Discount Company, Inc.