

**07-628-CD**  
**Target Nat'l Bank vs S. Jackson et al**

**Target National vs Stephanie Jackson et al**  
**2007-628-CD**

GREGG L. MORRIS, ESQ.  
PATENAUME & FELIX, A.P.C.  
213 E. MAIN STREET  
CARNEGIE, PA 15106  
(412) 429-7675  
FACSIMILE (412) 429-7679  
PA ID#69006

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TARGET NATIONAL BANK

Plaintiff,

v.

STEPHANIE E JACKSON A/K/A  
STEPHANIE FLASHER,

Defendant(s).

)  
NO. 07-628-CD  
FILED pd \$85.00 Atty  
M/11:10 am  
APR 23 2007 1CC Shff  
William A. Shaw  
Prothonotary/Clerk of Courts

COMPLAINT IN CIVIL ACTION

Filed on behalf of:  
TARGET NATIONAL BANK,  
Plaintiff

Counsel of Record for This Party:

Gregg L. Morris, Esquire  
Pa I.D. #69006

Patenaude & Felix, A.P.C.  
213 East Main Street  
Carnegie, PA 15106  
(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TARGET NATIONAL BANK, )  
Plaintiff, ) NO.  
v. )  
STEPHANIE E JACKSON A/K/A )  
STEPHANIE FLASHER, )  
Defendant. )

**NOTICE TO DEFEND**

**YOU HAVE BEEN SUED IN COURT.** If you wish to defend against the claims set forth in the following pages, you must take action within TWENTY (20) DAYS after this Complaint 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.

David S. Meholick  
Court Administration  
Clearfield County Courthouse  
Clearfield, PA 16830  
814-765-2641

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TARGET NATIONAL BANK, )  
                          )  
                          )  
Plaintiff            ) NO.  
                          )  
                          )  
v.                    )  
                          )  
                          )  
STEPHANIE E JACKSON A/K/A            )  
STEPHANIE FLASHER,            )  
                          )  
                          )  
Defendant.            )

**COMPLAINT IN CIVIL ACTION**

AND NOW, comes Plaintiff, TARGET NATIONAL BANK, by and through its attorney, GREGG L. MORRIS, ESQUIRE and the law offices of PATENAUME & FELIX, A.P.C. and files the following **Complaint in Civil Action**, and in support thereof aver as follows:

1. Plaintiff, TARGET NATIONAL BANK, is a corporation and for the purpose of this litigation, maintaining a place of business c/o Patenaude and Felix, A.P.C., 213 East Main Street, Carnegie, Pennsylvania 15106.
2. Defendant is STEPHANIE E JACKSON A/K/A STEPHANIE FLASHER, an adult individual, believed to currently reside at 310 WALKER ST , OSCEOLA MILLS, PA 16666.
3. Heretofore, the Defendant opened a TARGET NATIONAL BANK account with Plaintiff being Account No. 4352375056184866 , for the purchase of goods and services.
4. The Defendant has made or authorized a number of purchases and as of 03/09/07, Defendant owes \$2,576.25 on said account plus interest.

5. Plaintiff maintains accurate books of account recording all credits and debits for this account.

6. The Defendant has received monthly billing statements from Plaintiff setting forth the nature and amount of all charges made by Defendant, and the transactions between Plaintiff and Defendant give rise to an account stated, upon which Plaintiff has relied.

7. The Defendant made payments, but has refused to pay, and now refuses to pay the balance due and owing on the aforesaid account in the sum of \$2,576.25, plus interest and costs.

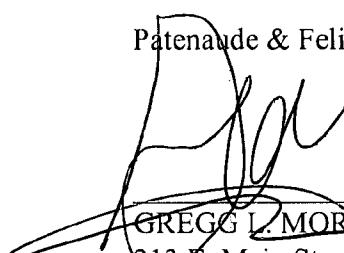
8. By failing to object or dispute to the statements including the statement attached hereto as Plaintiff's Exhibit "A", Defendant has assented to and agreed to the correctness of the balance due on the credit card account so as to constitute and account stated.

9. Despite repeated demands, Defendant has failed to make the required installment payments when due and therefore the full amount of the account is now due and payable.

**WHEREFORE**, Plaintiff demands Judgment in its favor, and against Defendant, in the amount of \$2,576.25, plus legal interest from the date of breach, with continuing interest at the legal rate thereon from the date of Judgment plus costs. The damages requested are less than the maximum amount for compulsory arbitration as set by the Court.

Respectfully Submitted:

Patenaupe & Felix, A.P.C.



GREGG L. MORRIS, ESQUIRE  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675



TARGET

2050.15402



\*00000\*

Account Number: 4352-3750-5618-4866  
STEPHANIE E JACKSON

Statement Closing Date: March 6, 2007  
Page 1 of 2

### Target Visa Account Summary

Total Credit Limit \$0  
Cash Limit \$0  
Available Credit \$0  
Portion Available for Cash \$0

The Cash Limit is a portion of the Total Credit Limit

### Questions? Call Us:

Target Credit Services 1-888-755-5856  
TDD/TDY 1-800-347-5842  
Outside the U.S. 11-612-307-8622 (Call Collect)

Calling will not preserve your billing-error rights

Previous Balance	\$2,541.25
Payments & Credits	0.00
Purchases & Advances	0.00
Other Charges	35.00
<b>FINANCE CHARGES</b>	<b>0.00</b>
<b>New Balance</b>	<b>\$2,576.25</b>
<b>Amount Past Due</b>	<b>\$721.75</b>
<b>Minimum Payment Due (includes any Amount Past Due)</b>	<b>\$2,576.25</b>
<b>Payment Due Date</b>	<b>March 31, 2007</b>

### Payments & Credits

No payments or credits were received last month.

### Other Charges

Mar. 3 LATE PAYMENT FEE	\$35.00
Total Other Charges	\$35.00

Target National Bank, an affiliate of Target Stores

NOTICE: SEE REVERSE SIDE FOR IMPORTANT INFORMATION

INCLUDE THIS PORTION WITH YOUR PAYMENT MADE PAYABLE TO TARGET NATIONAL BANK



Account Number 4352-3750-5618-4866  
New Balance \$2,576.25  
Minimum Payment Due \$2,576.25  
Payment Due Date March 31, 2007



NEW PHONE, HOME OR  
E-MAIL ADDRESS?  
PLEASE UPDATE ON  
REVERSE SIDE.

OFFICE COPY

STATEMENT PAGE NOT PRINTED

\*\*\*\*\*  
TARGET NATIONAL BANK  
P.O. BOX 59317  
MINNEAPOLIS, MN 55459-0317

Amount Enclosed \$

STEPHANIE E JACKSON  
105 ASHLEA GDNS  
NEW HOLLAND, PA 17557-1259



Exhibit "A"

3000600257625025762590435237505618486671



TARGET



\*00000\*

**Account Number:** 4352-3750-5618-4866  
STEPHANIE E JACKSON

**Statement Closing Date:** March 6, 2007  
Page 2 of 2

**Finance Charges**

Days in Billing Period: 28

Balance Type	Daily Periodic Rate	Corresponding Annual Percentage Rate	Average Daily Balance	Periodic FINANCE CHARGE	Transaction FINANCE CHARGE
Purchases	0.07736%	28.24%	\$0.00	\$0.00	\$0.00
Cash	0.07736%	28.24%	\$0.00	\$0.00	\$0.00
<b>Total FINANCE CHARGES:</b>				<b>\$0.00</b>	
<b>Actual ANNUAL PERCENTAGE RATE:</b>					<b>0.00%</b>

There is a minimum **FINANCE CHARGE** of **\$1.00** for any billing period in which a Finance Charge is imposed.

**Special Announcements and Exclusive Offers**

**Put your best Boots forward.**

Boots is Britain's #1 health and beauty brand and is now available at Target. With quality beauty products, delectable scents, and fabulous cosmetics, you'll be in for a nice, new treat. And don't forget to use your REDcard to earn points toward a 10% off shopping day. Subject to Target Rewards program rules.

In \_\_\_\_\_ Court

\_\_\_\_\_  
Judicial (Circuit/District)

Original Creditor Name: TARGET NATIONAL BANK

Debtor Name: JACKSON, STEPHANIE E

Co-Debtor Name:

Account Number: 4352375056184866

#### AFFIDAVIT OF ACCOUNT

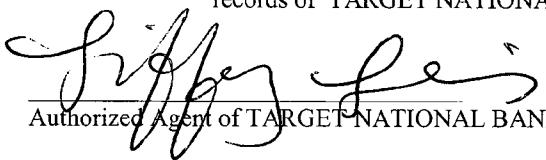
STATE OF MINNESOTA  
COUNTY OF HENNEPIN

ss:

The undersigned, TIFFANY LEWIS states that:

1. I am a representative of TARGET NATIONAL BANK and am authorized to Verify current balances due and owing to TARGET NATIONAL BANK on credit card accounts.
2. As of the date of this affidavit I have reviewed the records of the above listed person and account, and that the amount due and owing to TARGET NATIONAL BANK on this account, over and above all known legal set offs is \$2576.25.
3. That reasonable inquiry has been made to determine if the defendant is in the military service of the United States of America, and to the best of my knowledge that defendant is not in such military service and is therefore not entitled to the rights and privileges provided under the Soldiers and Sailors Civil Relief Act of 1940, as amended.

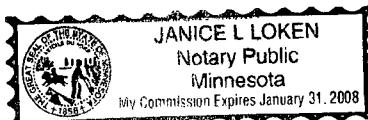
That the above information is true to the best of my knowledge, information and belief, and based upon the books and business records of TARGET NATIONAL BANK.

  
Authorized Agent of TARGET NATIONAL BANK

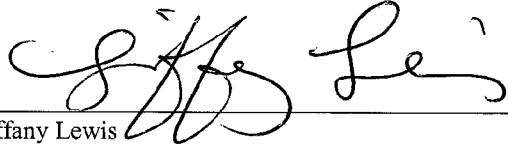
Subscribed and sworn to before  
Me on 13th day of March, 2007

  
Notary public  
My commission expires: 1/31/08

4352375056184866  
A144 PATENAUME & FELIX, A.P.C.



The undersigned does hereby verify subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities, that she is, Tiffany Lewis, Assistant Secretary, of Target National Bank, Plaintiff Herein, that she is duly authorized to make this Declaration, and hat the facts set forth in the foregoing Complaint in Civil Action are true and correct to the best of her knowledge, information and belief.



Tiffany Lewis  
Authorized Agent of Target National Bank/Target Visa

4352375056184866  
A144  
PATENAUX & FELIX, A.P.C

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102720  
NO: 07-628-CD  
SERVICE # 1 OF 1  
COMPLAINT

PLAINTIFF: TARGET NATIONAL BANK

vs.

DEFENDANT: STEPHANIE E. JACKSON aka STEPHANIE FLASHER

FILED

03/03/01  
SEP 28 2007

William A. Shaw  
Prothonotary/Clerk of Courts

SHERIFF RETURN

---

NOW, May 07, 2007, SHERIFF OF CENTRE COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN COMPLAINT ON STEPHANIE E. JACKSON aka STEPHANIE FLASHER.

NOW, May 23, 2007 AT 7:55 AM SERVED THE WITHIN COMPLAINT ON STEPHANIE E. JACKSON aka STEPHANIE FLASHER, DEFENDANT. THE RETURN OF CENTRE COUNTY IS HERETO ATTACHED AND MADE PART OF THIS RETURN.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102720  
NO: 07-628-CD  
SERVICES 1  
COMPLAINT

PLAINTIFF: TARGET NATIONAL BANK

vs.

DEFENDANT: STEPHANIE E. JACKSON aka STEPHANIE FLASHER

**SHERIFF RETURN**

---

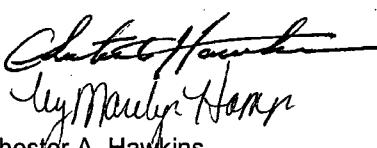
**RETURN COSTS**

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	PATENAUME	13113	10.00
SHERIFF HAWKINS	PATENAUME	13113	40.40
CENTRE CO.	PATENAUME	13287	75.00

Sworn to Before Me This

So Answers,

\_\_\_\_ Day of \_\_\_\_\_ 2007

  
Chester A. Hawkins  
Sheriff

# SHERIFF'S OFFICE

## CENTRE COUNTY

T.W

PATENAude & FELIX

Rm 101 Court House, Bellefonte, Pennsylvania, 16823 (814) 355-6803

### SHERIFF SERVICE PROCESS RECEIPT, AND AFFIDAVIT OF RETURN

INSTRUCTIONS FOR SERVICE OF PROCESS: You must file one instruction sheet for each defendant. Please type or print legibly. Do not detach any copies.

1. Plaintiff(s) Target National Bank	2. Case Number 07-628-CD
3. Defendant(s) Stephanie E Jackson a/k/a Stephanie Flasher	4. Type of Writ or Complaint: Complaint 102390

SERVE → 5. Name of Individual, Company, Corporation, Etc., to Serve or Description of Property to be Levied, Attached or Sold.  
Stephanie E Jackson a/k/a Stephanie Flasher

AT 6. Address (Street or RFD, Apartment No., City, Boro, Twp., State and Zip Code)  
310 Walker Street, Osceola Mills, PA 16666

7. Indicate unusual service:  Reg Mail  Certified Mail  Deputize  Post  Other

Now, 20 I SHERIFF OF CENTRE COUNTY, PA., do hereby depose the Sheriff of County to execute this Writ and make return thereof according to law. This deputation being made at the request and risk of the plaintiff. Sheriff of Centre County

#### 8. SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE

**NOTE ONLY APPLICABLE ON WRIT OF EXECUTION: N.B. WAIVER OF WATCHMAN** -- Any deputy sheriff levying upon or attaching any property under within writ may leave same without a watchman, in custody of whomever is found in possession, after notifying person of levy or attachment, without liability on the part of such deputy or the sheriff to any plaintiff herein for any loss, destruction or removal of any such property before sheriff's sale thereof.

9. Print/Type Name and Address of Attorney/Originator PATENAude & FELIX 213 E. MAIN ST.	10. Telephone Number (412) 429-7675	11. Date
	12. Signature	

CARNEGIE, PA. 15106

#### SPACE BELOW FOR USE OF SHERIFF ONLY - DO NOT WRITE BELOW THIS LINE

13. I acknowledge receipt of the writ or complaint as indicated above.	SIGNATURE of Authorized CCSD Deputy of Clerk and Title	14. Date Filed	15. Expiration/Hearing Date
--	--	----------------	-----------------------------

#### TO BE COMPLETED BY SHERIFF

16. Served and made known to Mike Flasher, on the 23 day of May,  
20 2007, at 7:55 AM o'clock, m. at 310 Walker Street, Osceola Mills, PA 16666, County of Centre

Commonwealth of Pennsylvania, in the manner described below:

Defendant(s) personally served.  
 Adult family member with whom said Defendant(s) resides(s). Relationship is husband  
 Adult in charge of Defendant's residence.  
 Manager/Clerk of place of lodging in which Defendant(s) resides(s).  
 Agent or person in charge of Defendant's office or usual place of business.

and officer of said Defendant company.

Other

On the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock, \_\_\_\_\_ M.

Defendant not found because:

Moved  Unknown  No Answer  Vacant  Other

Remarks:

Advance Costs 75.00	Docket 9.00	Service 9.00	Sur Charge 10.00	Affidavit 2.50	Mileage 44.50	Postage	Misc.	Total Costs 75.00	Costs Due or Refund 0.00
------------------------	----------------	-----------------	---------------------	-------------------	------------------	---------	-------	----------------------	-----------------------------

17. AFFIRMED and subscribed to before me this 4

20. day of June 2007

23. Arne Peters

COMMONWEALTH OF PENNSYLVANIA  
Notarial Seal

My Commission Expires  
December 31, 2009

24. I ACKNOWLEDGE RECEIPT OF THE SHERIFF'S RETURN SIGNATURE  
OF AUTHORIZED ATTORNEY PATENAude & FELIX, 2009

So Answer.

18. Signature of Dep. Sheriff	19. Date
-------------------------------	----------

21. Signature of Sheriff	22. Date
--------------------------	----------

SHERIFF OF CENTRE COUNTY

Amount Pd. Page

25. Date Received



CHESTER A. HAWKINS  
SHERIFF

**Sheriff's Office  
Clearfield County**

COURTHOUSE  
1 NORTH SECOND STREET, SUITE 116  
CLEARFIELD, PENNSYLVANIA 16830

OFFICE (814) 765-2641 EXT. 5986

FAX (814) 765-5915

ROBERT SNYDER

CHIEF DEPUTY

MARILYN HAMM  
DEPT. CLERK

CYNTHIA AUGHENBAUGH  
OFFICE MANAGER

KAREN BAUGHMAN  
CLERK TYPIST

PETER F. SMITH  
SOLICITOR

**DEPUTATION**

**IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA**

PAGE 102720

TERM & NO. 07-628-CD

TARGET NATIONAL BANK

COMPLAINT

VS.

STEPHANIE E. JACKSON aka STEPHANIE FLASHER

**SERVE BY: 05/23/07**

**HEARING:**

**MAKE REFUND PAYABLE TO PATENAUME & FELIX, ESQ.**

**SERVE:** STEPHANIE E. JACKSON aka STEPHANIE FLASHER

**ADDRESS:** 310 WALKER ST., OSCEOLA MILLS, PA 16666

Know all men by these presents, that I, CHESTER A. HAWKINS, HIGH SHERIFF OF CLEARFIELD COUNTY, State of Pennsylvania, do hereby deputize the SHERIFF OF CENTRE COUNTY, Pennsylvania to execute this writ. This Deputation being made at the request and risk of the Plaintiff this day, May 07, 2007.

RESPECTFULLY,

A handwritten signature in black ink, appearing to read "Chester A. Hawkins".

CHESTER A. HAWKINS,  
SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TARGET NATIONAL BANK

)

)

Plaintiff

) NO. 07-628-CD

)

)

v.

)

)

STEPHANIE E JACKSON

)

)

Defendant(s)

)

)

**PRAECIPE FOR DEFAULT  
JUDGMENT**

Filed on behalf of:  
TARGET NATIONAL BANK

Counsel of Record for This Party:

Gregg L. Morris, Esquire  
Pa I.D. #69006

Patenaude & Felix, A.P.C.  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675

**FILED** Atty pd  
m/2:06/07/00  
OCT 18 2007 CC&Notice  
to Def.  
William A. Shaw  
Prothonotary/Clerk of Courts

Statement to

Atty  
(GK)

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TARGET NATIONAL BANK

Plaintiff

)

) NO. 07-628-CD

)

)

)

)

)

)

STEPHANIE E JACKSON

Defendant(s)

)

)

**PLAINTIFF'S PRAECIPE FOR DEFAULT JUDGMENT**

TO: PROTHONOTARY

Please enter a judgment against the defendant, above named, for failure to file an Answer to Plaintiff's complaint.

Amount claimed in Complaint	\$2,576.25
Interest from March 09, 2007	\$0.00
Less payments received	\$0.00
Attorney's fees	\$0.00
<b>TOTAL</b>	<b>\$2,576.25</b>

With continuing interest on the principal amount of \$2,576.25, with interest at the legal rate, plus costs of suit.

I hereby certify that a written notice of intention to file this praecipe was mailed to the defendants and defendants' counsel (if known), after the default had occurred and at least ten (10) days prior to the date of the filing of this praecipe. A copy of the Notice is attached.

Respectfully submitted:

Paterno & Felix, A.P.C.

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

Gregg L. Morris, Esquire  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TARGET NATIONAL BANK

Plaintiff ) NO. 07-628-CD

v.

STEPHANIE E JACKSON

Defendant(s) )

)

**PLAINTIFF'S AFFIDAVIT OF NON-MILITARY SERVICE AND MAILING OF  
NOTICE PURSUANT TO PA.R.C.P. 1037(b)**

COMMONWEALTH OF PENNSYLVANIA )

) SS.

COUNTY OF CLEARFIELD )

Before me, the undersigned authority, a Notary Public in and for said County and State, personally appeared GREGG MORRIS, attorney for and authorized representative of Plaintiff, who being duly sworn according to law, deposes and states that the defendant(s), STEPHANIE E JACKSON, is not in the military service of the United States of America to the best of his knowledge, information and belief and certifies that Notice of Intent to take Default Judgment was mailed in accordance with Pa.R.C.P.237.1, as evidenced by the attached copy.

Respectfully submitted:

Patenaude & Felix, A.P.C.

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

\_\_\_\_\_  
Gregg L. Morris, Esquire  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675

Sworn to and subscribed before me this  
\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_.

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

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TARGET NATIONAL BANK

)

)

Plaintiff

) NO. 07-628-CD

)

)

v.

)

)

STEPHANIE E JACKSON

)

)

Defendant(s)

)

)

**IMPORTANT NOTICE**

Filed on behalf of:  
TARGET NATIONAL BANK

Counsel of Record for This Party:

Gregg L. Morris, Esquire  
Pa I.D. #69006

Patenaude & Felix, A.P.C.  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TARGET NATIONAL BANK )  
Plaintiff ) NO. 07-628-CD  
v. )  
STEPHANIE E JACKSON )  
Defendant(s) )

To: Stephanie E Jackson  
310 Walker St  
Osceola Mills Pennsylvania 16666

Date of Notice: October 04, 2007

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, 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 Courthouse  
David S. Meholic, Court Administrator 230 East Market Street  
Clearfield PA 16830  
814-765-2641

Respectfully submitted:  
Paterno & Felix, A.P.C.

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

\_\_\_\_\_  
Gregg L. Morris, Esquire  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675

I, GREGG MORRIS, attorney for Plaintiff, TARGET NATIONAL BANK , hereby certify that a true and correct copy of foregoing document was served this date by ordinary mail upon the following:

Stephanie E Jackson  
Defendant  
310 Walker St  
Osceola Mills PA 16666

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



\_\_\_\_\_  
Gregg L. Morris, Esquire  
Paternoade & Felix, A.P.C.  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TARGET NATIONAL BANK

)

)

Plaintiff

) NO. 07-628-CD

)

)

)

)

)

)

STEPHANIE E JACKSON

)

)

)

)

)

Defendant(s)

**NOTICE OF ORDER, DECREE  
OR JUDGMENT**

Filed on behalf of:  
TARGET NATIONAL BANK

Counsel of Record for This Party:

Gregg L. Morris, Esquire  
Pa I.D. #69006

Patenaude & Felix, A.P.C.  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TARGET NATIONAL BANK )

Plaintiff )

NO. 07-628-CD

v. )

STEPHANIE E JACKSON )

Defendant(s) )

)

**NOTICE OF ORDER, DECREE OR JUDGMENT**  
**AGAINST STEPHANIE E JACKSON ONLY**

TO: ( ) Plaintiff (x) Defendant ( ) Garnishee ( ) Additional Defendant

You are hereby notified that the following Order, Decree, or Judgment has been entered against you on October 18, 2007.

( ) Decree Nisi in Equity  
( ) Final Decree in Equity  
(X) Judgment of ( ) Confession ( ) Verdict ( ) Court Order  
(X) Default ( ) Non-suit  
( ) Non-Pros ( ) Arbitration Award

(X) Judgment in the amount of \$2,576.25, plus costs.  
( ) District Justice Transcript of Judgment in the amount of \$ \_\_\_\_\_, plus costs.  
( ) If not satisfied within sixty (60) days, your motor vehicle operator's license will be suspended by the Department of Transportation.

Prothonotary

By

Deputy

If you have questions concerning the above, please Contact:

Name of Attorney: GREGG MORRIS, Esquire  
213 East Main St  
Carnegie PA 15106  
(412)-429-7675

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

COPY

Target National Bank  
Plaintiff(s)

No.: 2007-00628-CD

Real Debt: \$2,576.25

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Stephanie E. Jackson  
Defendant(s)

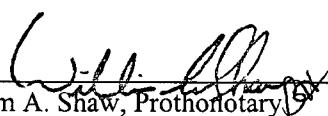
Entry: \$20.00

Instrument: Default Judgment

Date of Entry: October 18, 2007

Expires: October 18, 2012

Certified from the record this 18th day of October, 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

TARGET NATIONAL BANK )  
Plaintiff ) NO. 07-628-CD  
v. )  
STEPHANIE E JACKSON )  
Defendant(s) )  
PENNSYLVANIA STATE EMPL CU )  
Garnishee )

**PRAECIPE FOR WRIT OF  
EXECUTION**

Filed on behalf of:  
TARGET NATIONAL BANK

Counsel of Record for This Party:

Gregg L. Morris, Esquire  
Pa I.D. #69006

Patenaude & Felix, A.P.C.  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675

5  
**FILED** Atty pd. 20.00  
M 11 13 2009 JUN 15 2009 3cc & 3 wirts  
to Atty  
William A. Shaw  
Prothonotary/Clerk of Courts

(60)

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TARGET NATIONAL BANK )  
Plaintiff ) NO. 07-628-CD  
v. )  
STEPHANIE E JACKSON )  
Defendant(s) )  
PENNSYLVANIA STATE EMPL CU )  
Garnishee )

**PRAECIPE FOR WRIT OF EXECUTION**

To The Prothonotary:

Issue writ of execution in the above matter,

- (1) directed to the Sheriff of Clearfield County;
- (2) against, STEPHANIE E JACKSON Defendant(s);
- (3) against, PENNSYLVANIA STATE EMPL CU, Garnishee;
- (4) and index this writ
  - (a) against, Defendant(s) STEPHANIE E JACKSON, Defendant(s); and
  - (b) against PENNSYLVANIA STATE EMPL CU, Garnishee;

as a *lis pendens* against real property of the Defendant(s) in the name of the garnishee as follows:

(5) Amount due	<u>\$2,576.25</u>
Interest from October 18, 2007	<u>\$251.97</u>
At 6.00 % per annum	<u>\$</u>
(Costs to be added)	<u>125.00</u>
	<b>Prothonotary costs</b>
	<u>Attorney for Plaintiff</u>

*(Handwritten note: A large circle is drawn around the amount \$125.00.)*

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TARGET NATIONAL BANK

)

)

Plaintiff

) NO. 07-628-CD

)

)

v.

)

)

STEPHANIE E JACKSON

)

)

Defendant(s)

)

)

PENNSYLVANIA STATE EMPL CU

)

Garnishee

)

**WRIT OF EXECUTION NOTICE**

Filed on behalf of:

TARGET NATIONAL BANK

Counsel of Record for This Party:

Gregg L. Morris, Esquire  
Pa I.D. #69006

Patenaude & Felix, A.P.C.  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TARGET NATIONAL BANK )  
Plaintiff ) NO. 07-628-CD  
v. )  
STEPHANIE E JACKSON )  
Defendant(s) )  
PENNSYLVANIA STATE EMPL CU )  
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. Such property is said to be exempt. There is a debtor's exemption of \$300. There are other exemptions which may be applicable to you. Attached is a summary of some of the major exemptions. You may have other exemptions or other rights.

If you have an exemption, you should do the following promptly: (1) Fill out the attached claim form and demand for a prompt hearing. (2) Deliver the form or mail it to the Sheriff's Office at the address noted.

You should come to court 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.**

LAWYER REFERRAL SERVICE / LANCASTER COUNTY BAR ASSOCIATION  
28 ORANGE STREET  
LANCASTER PA 17602  
717-393-0737

MAJOR EXEMPTIONS UNDER  
PENNSYLVANIA AND  
FEDERAL LAW

- A. \$300 statutory exemption
- B. Bibles, school books, sewing machines, uniforms and equipment
- C. Most wages and unemployment compensation
- D. Social Security Benefits
- E. Certain retirement funds and accounts
- F. Certain veteran and armed forces benefits
- G. Certain insurance proceeds
- H. Such other exemptions as may be provided by law

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TARGET NATIONAL BANK

)

)

Plaintiff

) NO. 07-628-CD

)

)

v.

)

)

STEPHANIE E JACKSON

)

)

Defendant(s)

)

)

PENNSYLVANIA STATE EMPL CU

)

Garnishee

)

CLAIM FOR EXEMPTION  
TO THE SHERIFF:

I, the above named defendant, 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 \$300 statutory exemption be

      (i) set aside in kind (specify the property to be set aside in kind): \_\_\_\_\_  
\_\_\_\_\_

      (ii) paid in cash following exemption (specify the property and basis of the  
exemption): \_\_\_\_\_

(2) From my property which is in the possession of a third party, I claim the following  
exemptions:

(a) my \$300 statutory exemption be        in cash;        in kind (specify the property  
to be set aside in kind): \_\_\_\_\_.

(b) Social Security Benefits on deposit in the amount of \$ \_\_\_\_\_.

(c) other (specify the amount and the basis of the  
exemption): \_\_\_\_\_.

I request a prompt hearing to determine the exemption. Notice of the hearing should be given to 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 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

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

THIS CLAIM TO BE FILED WITH  
THE OFFICE OF THE SHERIFF  
OF CLEARFIELD COUNTY COURT OF COMMON PLEAS  
CLEARFIELD, PA 16830

(814)-76-5-26

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TARGET NATIONAL BANK )  
Plaintiff ) NO. 07-628-CD  
v. )  
STEPHANIE E JACKSON )  
Defendant(s) )  
PENNSYLVANIA STATE EMPL CU )  
Garnishee )

## INTERROGATORIES IN ATTACHMENT EXECUTION

Filed on behalf of:  
**TARGET NATIONAL BANK**

**Counsel of Record for This Party:**

Gregg L. Morris, Esquire  
Pa I.D. #69006

Patenaude & Felix, A.P.C.  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TARGET NATIONAL BANK )  
Plaintiff ) NO. 07-628-CD  
v. )  
STEPHANIE E JACKSON )  
Defendant(s) )  
PENNSYLVANIA STATE EMPL CU )  
Garnishee )

**OFFICES OF PATERNAUDE & FELIX  
BY: GREGG MORRIS, ESQUIRE  
213 East Main St  
Carnegie PA 15106  
858-244-7675**

You are hereby notified to  
plead to the enclosed  
Interrogatories within 20  
days from the date of  
hereof or a default  
judgment may be entered  
against you.

Gregg Morris, Esquire  
Attorney for Plaintiff

## INTERROGATORIES IN ATTACHMENT EXECUTION

You are required to answer the following interrogatories about Defendant(s) whose address is 310 WALKER ST, OSCEOLA MILLS PA 16666. You must file with the Court answers to the following interrogatories within twenty (20) days after service upon you. Failure to do so may result in a default judgment being entered against you. A copy of said answers must be served on the undersigned. If your answer to any of the following interrogatories is affirmative, specify the amount, value and/or nature of the subject property.

1. At the time you were served or at any subsequent time, did you owe the defendant(s) any money or were you liable to defendant(s) on any negotiable or other written instrument, or did defendant(s) claim that you owed them any money or were you liable to them for any reason? If yes, please specify as set forth herein.

2. At the time you were served, or at any subsequent time, was there in your possession, custody or control, or in joint possession, custody or control of yourself or others, any property of any nature owned solely or in party by the Defendant(s)? If yes, please list and describe the property.

3. At the time you were served, or at any subsequent time, did you hold legal title to any property or any nature owned solely or in part by the Defendant(s)? If yes please list and describe the property.

4. At the time you were served, or at any subsequent time, did you hold as fiduciary any property in which the Defendant(s) had an interest? If yes, please list and describe the property.

5. At any time before or after you were served, did the Defendant(s) transfer or deliver any property to you, or to any person, or place pursuant to your directions or consent? If yes, what was the consideration therefore?

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

7. 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, the amount being withheld under each exemption and the entity electronically depositing those funds on a recurring basis.

8. 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. § 8123? If so, identify each account..

Respectfully submitted:  
Patenaude & Felix, A.P.C.

Date: February 20, 2009

\_\_\_\_\_  
Gregg L. Morris, Esquire  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TARGET NATIONAL BANK )  
Plaintiff ) NO. 07-628-CD  
v. )  
STEPHANIE E JACKSON )  
Defendant(s) )  
PENNSYLVANIA STATE EMPL CU )  
Garnishee )

## WRIT OF EXECUTION

Filed on behalf of:  
TARGET NATIONAL BANK

**Counsel of Record for This Party:**

Gregg L. Morris, Esquire  
Pa I.D. #69006

Patenaude & Felix, A.P.C.  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675

**COPY**

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TARGET NATIONAL BANK )  
Plaintiff ) NO. 07-628-CD  
v. )  
STEPHANIE E JACKSON )  
Defendant(s) )  
PENNSYLVANIA STATE EMPL CU )  
Garnishee )

**WRIT OF EXECUTION**

To the Sheriff of Dauphin County:

To satisfy the judgment, interest and costs against STEPHANIE E JACKSON, Defendant(s),

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

(2) You are also directed to attach the property of the defendant(s) not levied upon in the possession of PENNSYLVANIA STATE EMPL CU as Garnishee, and to notify garnishee that

(a) an attachment has issued;

(b) the garnishee is enjoined from paying any debt to or for the account of the defendant and from delivering any property of the defendant 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 a named garnishee, you are directed to notify him that he has been added as a garnishee and is enjoined as above stated.

Amount due	\$2,576.25
Interest from October 18, 2007	
At 6.00 % per annum	\$251.97
(Costs to be added)	\$

125.00 Prothonotary costs

Seal  
BY \_\_\_\_\_

Prothonotary *William L. Hagan* 10/15/09  
*BD*

*m/bm* note. 7.00 pd.  
Atty. Morris.

# FILED

2016 APR 11 AM 11:34

*S* BRIAN K. SPENCER  
PROTHONOTARY &  
CLERK OF COURTS

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TARGET NATIONAL BANK

Plaintiff

) NO. 07-628-CD

v.

STEPHANIE E JACKSON

Defendant

)

## PRAECIPE FOR ASSIGN JUDGMENT

Filed on behalf of:  
TARGET NATIONAL BANK

Counsel of Record for This Party:

Gregg L. Morris, Esquire  
Pa I.D. #69006

Patenaude & Felix, A.P.C.  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TARGET NATIONAL BANK

Plaintiff ) NO. 07-628-CD

v.

STEPHANIE E JACKSON

Defendant )

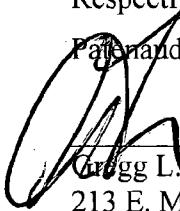
**PRAECIPE TO ASSIGN JUDGMENT FROM PLAINTIFF TO**  
**TD BANK USA, N.A. AS USE as PLAINTIFF**

TO: Prothonotary

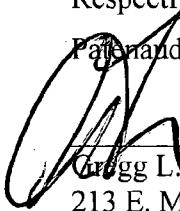
Kindly mark the Judgment plus costs to use of TD BANK USA, N.A. and assign from Plaintiff to TD BANK USA, N.A., 3701 Wayzata Blvd. Minneapolis, MN 55416, upon payment of cost only.

Amount of Judgment: \$2,576.25

Respectfully submitted:

  
Paternoster & Felix, A.P.C.

Date: April 06, 2016

  
\_\_\_\_\_  
Gregg L. Morris, Esquire  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675

EXECUTION COPY

**ASSIGNMENT AND ASSUMPTION AGREEMENT**

This Assignment and Assumption Agreement, dated as of March 13, 2013 (the "Assignment and Assumption") is entered into by (i) Target National Bank, a national banking association; Target Receivables LLC, a Minnesota limited liability company ("TRLLC" and together with Target National Bank, the "Sellers," and each a "Seller"), as the Sellers, and TD Bank USA, N.A., a national banking association (the "Purchaser"), as the Purchaser, pursuant to subsection 3.1(b) of the Purchase and Sale Agreement, dated as of October 22, 2012, as amended by the First Amendment thereto, dated as of March 13, 2013 (as amended, the "Purchase and Sale Agreement"), by and among the Sellers, Target Corporation, a Minnesota corporation (the "Parent") and the Purchaser, and (ii) Target National Bank, as the depositee (in such capacity, the "Depositee") and the Parent, as the depositor (in such capacity, the "Depositor") as parties to the Deposit Account Agreement #1 and Deposit Account Agreement #2, each dated as of April 28, 2009 (collectively, the "Deposit Account Agreement"), pursuant to subsection 3.1(d) of the Purchase and Sale Agreement.

Section 1. Definitions.

Capitalized terms used but not defined in this Assignment and Assumption have the same meaning as set forth in the Purchase and Sale Agreement, or if such term is not defined therein, the Credit Card Program Agreement (the "Credit Card Program Agreement"), dated as of October 22, 2012, by and among the Parent, Target Enterprise, Inc., a Minnesota corporation and the Purchaser.

Section 2. Assignment.

(a) Purchase Agreement.

(i) The Sellers hereby sell, convey and assign to the Purchaser, free and clear of all Liens, the Acquired Assets, including, without limitation, each Private Label Account and Co-Branded Account owned by Target National Bank as of the Cut-Off Time and existing as of the Closing Date, including Closed Accounts and Written-Off Accounts as of the Closing Date (the "Accounts").

(ii) All purchases and cash advances in connection with the Accounts and the Cardholder Indebtedness related to such Accounts outstanding as of the Closing Date or thereafter effected shall create the relationship of debtor and creditor between the Cardholder and the Purchaser, respectively.

(iii) The Sellers acknowledge and agree that, following the Closing Date, (x) they shall have no right, title or interest in or to, any of the Accounts or the Account Documentation related to such Accounts or any

proceeds of the foregoing, and (y) the Purchaser shall extend credit directly to Cardholders.

(b) Deposit Account Agreement.

(i) The Depositee hereby transfers and assigns to the Purchaser all of its rights and obligations under the Deposit Account Agreement, including all deposit Liabilities currently outstanding.

(ii) On the Closing Date, the Depositee hereby pays to the Purchaser an amount equal to the Deposit Liabilities held by the Depositee for the Depositor, as estimated per subsection 3.1(d)(i) of the Purchase and Sale Agreement (which payment shall be made by a deduction from the Purchase Price and is subject to final adjustment as provided in subsection 3.1(d) of the Purchase and Sale Agreement).

(iii) The Depositor and Depositee agree to terminate those two certain Pledge and Security Agreements, each dated as of April 28, 2009, and the pledges therein.

(iv) The Depositor and Depositee agree that notwithstanding any other provision of the Deposit Account Agreement, no interest shall accrue thereunder on or after the Closing Date.

Section 3. Assumption.

(a) Purchase Agreement.

(i) The Purchaser hereby assumes and shall pay, defend, discharge and perform as and when due the Assumed Liabilities upon the terms and conditions set forth in the Purchase and Sale Agreement. For greater certainty, the Purchaser will not be assuming or agreeing to pay, defend, discharge and perform the Excluded Liabilities.

(ii) The Purchaser hereby agrees to purchase all the Acquired Assets and on and after the Closing Date, the Purchaser shall be the sole and exclusive owner of the Accounts and other Acquired Assets, and shall have all rights, powers, and privileges with respect thereto as such owner.

(iii) Except as expressly provided in the Credit Card Program Agreement, the Purchaser shall be entitled to (x) receive all payments made by Cardholders on Accounts, and (y) retain for its account all Cardholder Indebtedness related to Accounts and such other fees and income authorized by the Credit Card Agreements and collected by the Purchaser with respect to the Accounts and the Cardholder Indebtedness related to such Accounts.

(b) Deposit Account Agreement.

(i) The Purchaser hereby assumes all rights and obligations of the Depositee under the Deposit Account Agreement, including all deposit Liabilities thereunder to the extent outstanding as of the Closing Date, as set forth in the Purchase and Sale Agreement.

(ii) On the Business Day following the Closing Date, the Purchaser hereby agrees to pay the amount of such deposit Liabilities assumed, as estimated per subsection 3.1(d) of the Purchase and Sale Agreement, to the Depositor.

**Section 4. Credit Card Program Agreement.**

The terms of the operation of the Program with respect to the Acquired Assets and Assumed Liabilities will be subject to the terms and conditions of the Credit Card Program Agreement. The Parent and/or its Affiliate(s) and the Purchaser shall have the rights set forth in the Credit Card Program Agreement in accordance with the terms thereof.

**Section 5. Counterparts.**

This Assignment and Assumption may be executed in two or more counterparts (and by different parties on separate counterparts), each of which shall be an original, but all of which together shall constitute one and the same instrument.

**Section 6. Effect of Headings.**

The Section headings herein are for convenience only and shall not affect the construction hereof.

**Section 7. Severability.**

In case any provision in this Assignment and Assumption shall be invalid, illegal or unenforceable, the validity, legality, and enforceability of the remaining provisions shall not be affected or impaired thereby.

**Section 8. Governing Law.**

THIS ASSIGNMENT AND ASSUMPTION SHALL BE GOVERNED BY, AND CONSTRUED IN ACCORDANCE WITH, THE LAWS OF THE STATE OF NEW YORK, WITHOUT REFERENCE TO ITS CONFLICT OF LAWS PROVISIONS (OTHER THAN SECTION 5-1401 OF THE GENERAL OBLIGATIONS LAW), AND THE OBLIGATIONS, RIGHTS AND REMEDIES OF THE PARTIES HEREUNDER SHALL BE DETERMINED IN ACCORDANCE WITH SUCH LAWS.

Section 9. Effective Date.

This Assignment and Assumption shall become effective as of the day and year first above written.

[REMAINDER OF THE PAGE BLANK]

IN WITNESS WHEREOF, the parties hereto have caused this Assignment and Assumption to be duly executed by their respective officers as of the day and year first above written.

TARGET CORPORATION,  
as the Parent and as the Depositor

By: Sara Ross  
Name: Sara J. Ross  
Title: Assistant Treasurer

TARGET RECEIVABLES LLC, as a Seller

By: Sara Ross  
Name: Sara J. Ross  
Title: Vice President and Assistant Treasurer

TARGET NATIONAL BANK,  
as a Seller and the Depositee

By: Spencer Johnson  
Name: Spencer Johnson  
Title: Vice President

TD BANK USA, N.A., as the Purchaser

By: Michael S. Collins  
Name: Michael Collins  
Title: President and CEO

12.17

DE:PA/LL/BS

I, GREGG MORRIS, attorney for Plaintiff, TARGET NATIONAL BANK , hereby certify that a true and correct copy of foregoing document was served this date by ordinary mail upon the following:

Stephanie E Jackson  
310 Walker St  
Osceola Mills PA 16666

Date: April 06, 2016

  
\_\_\_\_\_  
Gregg L. Morris, Esquire  
Paterno & Felix, A.P.C.  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675

**FILED**

2016 APR 11 AM 34

**BRIAN K. SPENCER  
PROTHONOTARY &  
CLERK OF COURTS**

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TD BANK USA, N.A., AS SUCCESSOR IN INTEREST TO )  
TARGET NATIONAL BANK )  
Plaintiff ) NO. 07-628-CD  
v. )  
STEPHANIE E JACKSON )  
1109 Kathryn St Boalsburg Pa 16827 )  
Defendant )  
PSECU )  
1 Credit Union Place Harrisburg Pa 17110 )  
Garnishee )

**PRAECIPE FOR WRIT OF  
EXECUTION**

Filed on behalf of:  
TD BANK USA, N.A., AS  
SUCCESSOR IN INTEREST TO  
TARGET NATIONAL BANK

Counsel of Record for This Party:

Gregg L. Morris, Esquire  
Pa I.D. #69006

Patenaude & Felix, A.P.C.  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675

5  
FILED  
2016 APR 21 PM 3:56  
BRIAN K. SPENCER  
PROTHONOTARY &  
CLERK OF COURTS  
JNQ1W  
PA 15406  
PA 15406  
2016 APR 21 PM 3:56  
S. Morris, Atty. Morris

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TD BANK USA, N.A., AS SUCCESSOR IN INTEREST TO )  
TARGET NATIONAL BANK )  
Plaintiff ) NO. 07-628-CD  
v. )  
STEPHANIE E JACKSON )  
1109 Kathryn St Boalsburg Pa 16827 )  
Defendant )  
PSECU )  
1 Credit Union Place Harrisburg Pa 17110 )  
Garnishee )

## **PRAEICE FOR WRIT OF EXECUTION**

## To The Prothonotary:

Issue writ of execution in the above matter,

- (1) directed to the Sheriff of DAUPHIN County;
- (2) against, STEPHANIE E JACKSON Defendant;
- (3) against, PSECU, Garnishee;
- (4) and index this writ
  - (a) against, Defendant STEPHANIE E JACKSON, Defendant; and
  - (b) against PSECU, Garnishee;

as a *lis pendens* against personal property of the Defendant in the name of the garnishee as follows:

(5) Amount due	<u>\$2,576.25</u>
Interest from October 18, 2007	<u>\$1299.06</u>
At 6.00 % per annum on \$2,576.25	<u>\$0.00</u>
Court Cost	<u>\$0.00</u>
Less: Payment	<u>\$0.00</u>
Total	<u>\$3875.21</u>

Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TD BANK USA, N.A., AS SUCCESSOR IN INTEREST TO )  
TARGET NATIONAL BANK )  
Plaintiff ) NO. 07-628-CD  
v. )  
STEPHANIE E JACKSON )  
1109 Kathryn St Boalsburg Pa 16827 )  
Defendant )  
PSECU )  
1 Credit Union Place Harrisburg Pa 17110 )  
Garnishee )

**WRIT OF EXECUTION**

Filed on behalf of:  
TD BANK USA, N.A., AS  
SUCCESSOR IN INTEREST TO  
TARGET NATIONAL BANK

Counsel of Record for This Party:

Gregg L. Morris, Esquire  
Pa I.D. #69006

Patenaude & Felix, A.P.C.  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TD BANK USA, N.A., AS SUCCESSOR IN INTEREST TO )  
TARGET NATIONAL BANK )  
Plaintiff ) NO. 07-628-CD  
v. )  
STEPHANIE E JACKSON )  
1109 Kathryn St Boalsburg Pa 16827 )  
Defendant )  
PSECU )  
1 Credit Union Place Harrisburg Pa 17110 )  
Garnishee )

**WRIT OF EXECUTION**

To the Sheriff of DAUPHIN County:

To satisfy the judgment, interest and costs against STEPHANIE E JACKSON,  
Defendant,

- (1) You are directed to levy upon the property of the defendant and to sell his interest therein;
- (2) You are also directed to attach the property of the defendant not levied upon in the possession of PSECU as Garnishee, and to notify garnishee that
  - (a) an attachment has issued;
  - (b) except as provided in paragraph (c), the garnishee is enjoined from paying any debt to or for the account of the defendant and from delivering any property of the defendant or otherwise disposing thereof;
  - (c) the attachment shall not include [any funds in an account of the defendant with a bank or other financial institution
    - (i) in which funds are deposited electronically on a recurring basis and are identified as being funds that upon deposit are exempt from execution, levy or attachment under Pennsylvania or federal law, or] (i) the first \$10,000 of each account of the defendant in with a bank or other financial institution containing any funds which are deposited electronically on a recurring basis and are identified as being funds that upon deposit are exempt from execution, levy or attachment under Pennsylvania or federal law.
    - (ii) each account of the defendant with a bank or other financial institution in which funds on deposit exceed \$10,000 at any time if all funds are deposited electronically on a recurring basis and are identified as being funds that upon deposit are exempt from execution, levy or attachment under Pennsylvania or federal law.

(iii) any funds in an account of the defendant with a bank or other financial institution that total \$300 or less. If multiple accounts are attached, a total of \$300 in all accounts shall not be subject to levy and attachment as determined by the executing officer. The funds shall be set aside pursuant to the defendant's general exemption provided in 42 Pa.C.S. 8123.

(3) If property of the defendant not levied upon and subject to attachment is found in the possession of anyone other than a named garnishee, you are directed to notify such person that he/she has been added as a garnishee and is enjoined as above stated.

(5) Amount due	<u>\$2,576.25</u>
Interest from October 18, 2007	<u>\$1299.06</u>
At 6.00 % per annum on \$2,576.25	<u>\$0.00</u>
Court Cost	<u>\$0.00</u>
Less: Payment	<u>\$3875.31</u>
Total	

Seal  
BY 4/21/2016

*Mark. Spiale, Esq.*  
Prothonotary

Prothonotary costs \$152.00

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TD BANK USA, N.A., AS SUCCESSOR IN INTEREST TO )  
TARGET NATIONAL BANK )  
Plaintiff ) NO. 07-628-CD  
v. )  
STEPHANIE E JACKSON )  
1109 Kathryn St Boalsburg Pa 16827 )  
Defendant )  
PSECU )  
1 Credit Union Place Harrisburg Pa 17110 )  
Garnishee )

**WRIT OF EXECUTION NOTICE**

Filed on behalf of:  
TD BANK USA, N.A., AS  
SUCCESSOR IN INTEREST TO  
TARGET NATIONAL BANK

Counsel of Record for This Party:

Gregg L. Morris, Esquire  
Pa I.D. #69006

Patenaude & Felix, A.P.C.  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TD BANK USA, N.A., AS SUCCESSOR IN INTEREST TO )  
TARGET NATIONAL BANK )  
Plaintiff ) NO. 07-628-CD  
v. )  
STEPHANIE E JACKSON )  
1109 Kathryn St Boalsburg Pa 16827 )  
Defendant )  
PSECU )  
1 Credit Union Place Harrisburg Pa 17110 )  
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. Such property is said to be exempt. There is a debtor's exemption of \$300. There are other exemptions which may be applicable to you. Attached is a summary of some of the major exemptions. You may have other exemptions or other rights.

If you have an exemption, you should do the following promptly: (1) Fill out the attached claim form and demand for a prompt hearing. (2) Deliver the form or mail it to the Sheriff's Office at the address noted.

You should come to court 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.

CENTRE COUNTY BAR ASSOCIATION  
232 MATCH FACTORY PLACE  
BELLEFONTE PA 16823  
**814-548-0052**

MAJOR EXEMPTIONS UNDER  
PENNSYLVANIA AND  
FEDERAL LAW

- A. \$300 statutory exemption
- B. Bibles, school books, sewing machines, uniforms and equipment
- C. Most wages and unemployment compensation
- D. Social Security Benefits
- E. Certain retirement funds and accounts
- F. Certain veteran and armed forces benefits
- G. Certain insurance proceeds
- H. Such other exemptions as may be provided by law

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TD BANK USA, N.A., AS SUCCESSOR IN INTEREST TO )  
TARGET NATIONAL BANK )  
Plaintiff ) NO. 07-628-CD  
v. )  
STEPHANIE E JACKSON )  
1109 Kathryn St Boalsburg Pa 16827 )  
Defendant )  
PSECU )  
1 Credit Union Place Harrisburg Pa 17110 )  
Garnishee )

CLAIM FOR EXEMPTION  
TO THE SHERIFF:

I, the above named defendant, 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 \$300 statutory exemption be  
\_\_\_\_(i) set aside in kind (specify the property to be set aside in kind): \_\_\_\_\_

\_\_\_\_(ii) paid in cash following the sale of the property levied upon; or  
(b) I claim the following exemption (specify property and basis of exemption): \_\_\_\_\_

(2) From my property which is in the possession of a third party, I claim the following exemptions:

(a) my \$300 statutory exemption be \_\_\_\_ in cash; \_\_\_\_ in kind (specify the property to be set aside in kind): \_\_\_\_\_  
(b) other (specify the amount and the basis of the exemption): \_\_\_\_\_

I request a prompt hearing to determine the exemption. Notice of the hearing should be given to 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 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

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

Defendant

THIS CLAIM TO BE FILED WITH  
THE OFFICE OF THE SHERIFF  
OF DAUPHIN COUNTY  
HARRISBURG PA 17101

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TD BANK USA, N.A., AS SUCCESSOR IN INTEREST TO )  
TARGET NATIONAL BANK )  
Plaintiff ) NO. 07-628-CD  
v. )  
STEPHANIE E JACKSON )  
1109 Kathryn St Boalsburg Pa 16827 )  
Defendant )  
PSECU )  
1 Credit Union Place Harrisburg Pa 17110 )  
Garnishee )

**INTERROGATORIES IN  
ATTACHMENT EXECUTION**

Filed on behalf of:  
TD BANK USA, N.A., AS  
SUCCESSOR IN INTEREST TO  
TARGET NATIONAL BANK

Counsel of Record for This Party:

Gregg L. Morris, Esquire  
Pa I.D. #69006

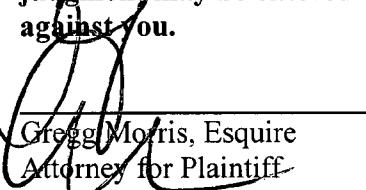
Patenaude & Felix, A.P.C.  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TD BANK USA, N.A., AS SUCCESSOR IN INTEREST TO )  
TARGET NATIONAL BANK )  
Plaintiff ) NO. 07-628-CD  
v. )  
STEPHANIE E JACKSON )  
1109 Kathryn St Boalsburg Pa 16827 )  
Defendant )  
PSECU )  
1 Credit Union Place Harrisburg Pa 17110 )  
Garnishee )

**OFFICES OF PATENAUME & FELIX**  
BY: GREGG MORRIS, ESQUIRE  
213 East Main St  
Carnegie PA 15106  
858-244-7675

You are hereby notified to  
plead to the enclosed  
Interrogatories within 20  
days from the date of  
hereof or a default  
judgment may be entered  
against you.

  
\_\_\_\_\_  
Gregg Morris, Esquire  
Attorney for Plaintiff

**INTERROGATORIES IN ATTACHMENT EXECUTION**

You are required to answer the following interrogatories about Defendant(s) whose address is 310 WALKER ST, OSCEOLA MILLS PA 16666. You must file with the Court answers to the following interrogatories within twenty (20) days after service upon you. Failure to do so may result in a default judgment being entered against you. A copy of said answers must be served on the undersigned. If your answer to any of the following interrogatories is affirmative, specify the amount, value and/or nature of the subject property.

1. At the time you were served or at any subsequent time, did you owe the defendant(s) any money or were you liable to defendant(s) on any negotiable or other written instrument, or did defendant(s) claim that you owed them any money or were you liable to them for any reason? If yes, please specify as set forth herein.

2. At the time you were served, or at any subsequent time, was there in your possession, custody or control, or in joint possession, custody or control of yourself or others, any property of any nature owned solely or in party by the Defendant(s)? If yes, please list and describe the property.

3. At the time you were served, or at any subsequent time, did you hold legal title to any property or any nature owned solely or in part by the Defendant(s)? If yes please list and describe the property.

4. At the time you were served, or at any subsequent time, did you hold as fiduciary any property in which the Defendant(s) had an interest? If yes, please list and describe the property.

5. At any time before or after you were served, did the Defendant(s) transfer or deliver any property to you, or to any person, or place pursuant to your directions or consent? If yes, what was the consideration therefore?

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

7. 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, the amount being withheld under each exemption and the entity electronically depositing those funds on a recurring basis.

8. 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. § 8123? If so, identify each account.

Respectfully submitted:

Penaude & Felix, A.P.C.

  
\_\_\_\_\_  
Gregg L. Morris, Esquire  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675

Date: April 06, 2016

STEBBINS 11/14/13  
P&F FILE NO. 2050.15402  
ESTATE OF ELLIOTT L. STEBBINS  
SCIP 760 51 15 - 07

2016 APR 21 P 12:56

FILED

BRIAN K. SPENCER  
PROTHONOTARY &  
CLERK OF COURTS

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TD BANK USA, N.A., AS SUCCESSOR IN INTEREST TO )  
TARGET NATIONAL BANK )  
Plaintiff ) NO. 07-628-CD  
v. )  
STEPHANIE E JACKSON )  
Defendant )  
PSECU )  
Garnishee )

**PRAECIPE TO SETTLE  
AND DISCONTINUE WITHOUT  
PREJUDICE AS TO  
GARNISHEE ONLY**

Filed on behalf of:  
TD BANK USA, N.A., AS  
SUCCESSOR IN INTEREST TO  
TARGET NATIONAL BANK

Counsel of Record for This Party:

Gregg L. Morris, Esquire  
Pa I.D. #69006

Patenaude & Felix, A.P.C.  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675

BNM  
**FILED**  
M1 BMT/1138a  
**MAY 09 2016**  
**NOCC 87pm**  
**BRIAN K. SPENCER**  
**PROTHONOTARY & CLERK OF COURTS**

S

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TD BANK USA, N.A., AS SUCCESSOR IN INTEREST TO )  
TARGET NATIONAL BANK )  
Plaintiff ) NO. 07-628-CD  
v. )  
STEPHANIE E JACKSON )  
Defendant )

**PRAECIPE TO SETTLE AND DISCONTINUE WITHOUT PREJUDICE AS TO**  
**GARNIShee ONLY**

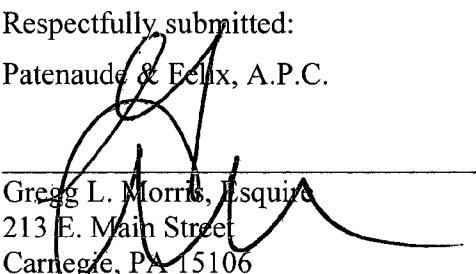
TO: Prothonotary

Please settle and discontinue the matter captioned above without prejudice as to  
Garnishee only. Thank you.

Respectfully submitted:  
Patenaude & Felix, A.P.C.

Date: May 6, 2016

\_\_\_\_\_  
Gregg L. Morris, Esquire  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675



I, GREGG MORRIS, attorney for Plaintiff, TD BANK USA, N.A., AS SUCCESSOR IN  
INTEREST TO TARGET NATIONAL BANK, hereby certify that a true and correct of the  
foregoing document was served this date by US First Class Mail, postage prepaid upon the  
following:

PSECU  
1 CREDIT UNION PLACE  
HARRISBURG PA 17110

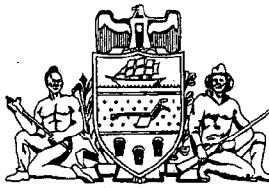
STEPHANIE JACKSON  
1408 TADPOLE RD  
FURNACE PA 16865

Date: May 6, 2016

Gregg L. Morris, Esquire  
Patchaude & Felix, A.P.C.  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675

# Office of the Sheriff

2007-628-CD



Shelley Ruhl  
Real Estate Deputy

David B. Dowling  
Solicitor

Jack Duignan  
Chief Deputy

Dauphin County  
101 Market Street  
Harrisburg, Pennsylvania 17101-2079  
ph: (717) 780-6590 fax: (717) 780-6557

NICHOLAS CHIMENTI JR.  
Sheriff

## Personal Property DOCKET SUMMARY

File #	Case Number	Document Type	Bankruptcy Case Number
	2016-CV-03249-NT	WRIT OF EXECUTION & INTERROGATORIES	

Received From: County  
Date Received: 4/29/2016 Date Expires:

### PEOPLE ASSOCIATED WITH THE CASE

#### Primary Defendant(s)

Name: STEPHANIE E JACKSON DOB:

#### Defendant(s)

Name: PSECU - GARNISHEE DOB:  
Type of Service: PERSON IN CHARGE  
Address: 1500 ELMERTON AVE HARRISBURG, PA 17110

#### Primary Plaintiff(s)

Name: TD BANK USA NA AS SUCCESSOR IN INTEREST TO TARGET DOB:  
NATIONAL BANK  
Attorney: GREGG MORRIS  
Firm: PATENAUME & FELIX, A.P.C.  
Attorney Phone: 412-429-7675  
Attorney Address: 213 E. MAIN ST CARNEGIE, PA 15106

### PERSONAL PROPERTY INFORMATION

Monies Levied: Date of Sale:  
Date of Levy:  
District Justice:

### COMMENTS

4/29/16 SENT GARNISHMENT OUT WITH DEPUTIES  
5/2/16 14:00 - DEPUTY TEETER AND DEPUTY PIERCE COMPLETED  
THE GARNISHMENT.

BT  
MAY 13 A 9:28  
BRIAN K. SPENCER  
PROTHONOTARY &  
CLERK OF COURTS  
FILED S

5/4/16 - SENT THE RETURN LETTER AND WRIT TO STAY TO

ATTORNEY

WRIT IN MAY LETTER FILE

5/6/16 RECEIVED FORMAL REQUEST BACK FROM ATTY; NO  
PAYMENT

5/10/16 RETURNED WRIT TO CLEARFIELD COUNTY PROTHY -  
STAYED

SENT COPY OF DOCKET SUMMARY TO DAUPHIN COUNTY PROTHY

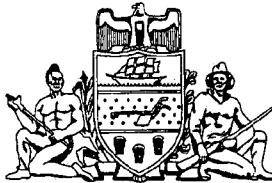
**Cash Accounting**

Amount	Date Added	Category	ID
\$200.00	5/2/2016	Deposit Agency	527360
(\$10.00)	5/10/2016	State Fee	528018
(\$93.00)	5/10/2016	Sheriff Costs	528019
(\$1.86)	5/10/2016	Poundage	528020
(\$95.14)	5/10/2016	Refund to Atty/Pltf	528023

**Total Number of Rows: 5**

**Balance Due: \$0.00**

# Office of the Sheriff



Shelley Ruhl  
Real Estate Deputy

David B. Dowling  
Solicitor

Jack Duignan  
Chief Deputy

Dauphin County  
101 Market Street  
Harrisburg, Pennsylvania 17101-2079  
ph: (717) 780-6590 fax: (717) 780-6557

Nicholas Chimienti Jr.  
Sheriff

**Commonwealth of Pennsylvania**

**County of Dauphin**

TD BANK USA NA AS SUCCESSOR IN  
: INTEREST TO TARGET NATIONAL  
BANK  
VS  
: STEPHANIE E JACKSON

Sheriff's Return  
No. 2016-CV-03249-NT

And now: MAY 2, 2016 at 2:00:00 PM served the within WRIT OF EXECUTION & INTERROGATORIES upon PSECU - GARNISHEE by personally handing to STEPHANIE JOHNSON (SERVICE ADVISOR) 1 true attested copy of the original WRIT OF EXECUTION & INTERROGATORIES and making known to him/her the contents thereof at 1500 ELMERTON AVE HARRISBURG PA 17110

So Answers,

Sheriff of Dauphin County, Pa.

Deputy: JEFFREY TEETER

Plaintiff: TD BANK USA NA AS SUCCESSOR IN INTEREST TO TARGET NATIONAL BANK

Sheriff's Costs: \$104.86 5/10/2016

Out Of County Cost:

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TD BANK USA, N.A., AS SUCCESSOR IN INTEREST TO )  
TARGET NATIONAL BANK )

Plaintiff )

v. )

STEPHANIE E JACKSON )  
1109 Kathryn St Boalsburg Pa 16827 )  
Defendant )

PSECU )  
1 Credit Union Place Harrisburg Pa 17110 )  
Garnishee )

2016-CV-3249-NT

NO. 07-628-CD

DAUPHIN COUNTY  
PENNA

RECEIVED  
PROTHONOTARY

2016 APR 29 AM 10:50

WRIT OF EXECUTION

Filed on behalf of:  
TD BANK USA, N.A., AS  
SUCCESSOR IN INTEREST TO  
TARGET NATIONAL BANK

Counsel of Record for This Party:

Gregg L. Morris, Esquire  
Pa I.D. #69006

Patenaude & Felix, A.P.C.  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675

DAUPHIN COUNTY  
SHERIFF'S OFFICE  
HARRISBURG, PA 17101

RECEIVED  
PROTHONOTARY

2016 APR 29 PM 1:18

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TD BANK USA, N.A., AS SUCCESSOR IN INTEREST TO )  
TARGET NATIONAL BANK ) 2016-CV-3249-NY  
Plaintiff ) NO. 07-628-CD  
v. )  
STEPHANIE E JACKSON )  
1109 Kathryn St Boalsburg Pa 16827 )  
Defendant )  
PSECU )  
1 Credit Union Place Harrisburg Pa 17110 )  
Garnishee )

OFFICE OF  
CLERK OF  
FRJTHURDAY

2016 APR 29 AM 10:50

DAUPHIN COUNTY  
PENNA

**WRIT OF EXECUTION**

To the Sheriff of DAUPHIN County:

To satisfy the judgment, interest and costs against STEPHANIE E JACKSON,  
Defendant,

- (1) You are directed to levy upon the property of the defendant and to sell his interest therein;
- (2) You are also directed to attach the property of the defendant not levied upon in the possession of PSECU as Garnishee, and to notify garnishee that
  - (a) an attachment has issued;
  - (b) except as provided in paragraph (c), the garnishee is enjoined from paying any debt to or for the account of the defendant and from delivering any property of the defendant or otherwise disposing thereof;
  - (c) the attachment shall not include [any funds in an account of the defendant with a bank or other financial institution
    - (i) in which funds are deposited electronically on a recurring basis and are identified as being funds that upon deposit are exempt from execution, levy or attachment under Pennsylvania or federal law, or] (i) the first \$10,000 of each account of the defendant in with a bank or other financial institution containing any funds which are deposited electronically on a recurring basis and are identified as being funds that upon deposit are exempt from execution, levy or attachment under Pennsylvania or federal law.
    - (ii) each account of the defendant with a bank or other financial institution in which funds on deposit exceed \$10,000 at any time if all funds are deposited electronically on a recurring basis and are identified as being funds that upon deposit are exempt from execution, levy or attachment under Pennsylvania or federal law.

(iii) any funds in an account of the defendant with a bank or other financial institution that total \$300 or less. If multiple accounts are attached, a total of \$300 in all accounts shall not be subject to levy and attachment as determined by the executing officer. The funds shall be set aside pursuant to the defendant's general exemption provided in 42 Pa.C.S. 8123.

(3) If property of the defendant not levied upon and subject to attachment is found in the possession of anyone other than a named garnishee, you are directed to notify such person that he/she has been added as a garnishee and is enjoined as above stated.

(5) Amount due	<u>\$2,576.25</u>
Interest from October 18, 2007	<u>\$1299.06</u>
At 6.00 % per annum on \$2,576.25	<u>\$0.00</u>
Court Cost	<u>\$0.00</u>
Less: Payment	<u>\$3875.31</u>
Total	

Seal  
BY

4/21/2016

*hank. Spaulding*

Prothonotary

Prothonotary costs \$152.00

Dauphin County Proth - \$4425

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TD BANK USA, N.A., AS SUCCESSOR IN INTEREST TO  
TARGET NATIONAL BANK

Plaintiff

v.

STEPHANIE E JACKSON  
1109 Kathryn St Boalsburg Pa 16827  
Defendant

PSECU  
1 Credit Union Place Harrisburg Pa 17110  
Garnishee

2016-CV-3249-NT  
NO. 07-628-CD

DAUPHIN COUNTY  
PENNA

2016 APR 29 AM 10:50

**WRIT OF EXECUTION NOTICE**

Filed on behalf of:  
TD BANK USA, N.A., AS  
SUCCESSOR IN INTEREST TO  
TARGET NATIONAL BANK

Counsel of Record for This Party:

Gregg L. Morris, Esquire  
Pa I.D. #69006

Patenaude & Felix, A.P.C.  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TD BANK USA, N.A., AS SUCCESSOR IN INTEREST TO )  
TARGET NATIONAL BANK ) 2016-CR-3249-NT  
Plaintiff ) NO. 07-628-CD  
v. )  
STEPHANIE E JACKSON )  
1109 Kathryn St Boalsburg Pa 16827 )  
Defendant )  
PSECU )  
1 Credit Union Place Harrisburg Pa 17110 )  
Garnishee )

2016 APR 29 AM10:50  
DAUPHIN COUNTY  
PENNA  
PROBATE  
JUDICATURE  
MONOTARY

**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. Such property is said to be exempt. There is a debtor's exemption of \$300. There are other exemptions which may be applicable to you. Attached is a summary of some of the major exemptions. You may have other exemptions or other rights.

If you have an exemption, you should do the following promptly: (1) Fill out the attached claim form and demand for a prompt hearing. (2) Deliver the form or mail it to the Sheriff's Office at the address noted.

You should come to court 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.**

CENTRE COUNTY BAR ASSOCIATION  
232 MATCH FACTORY PLACE  
BELLEFONTE PA 16823  
**814-548-0052**

**MAJOR EXEMPTIONS UNDER  
PENNSYLVANIA AND  
FEDERAL LAW**

- A. \$300 statutory exemption
- B. Bibles, school books, sewing machines, uniforms and equipment
- C. Most wages and unemployment compensation
- D. Social Security Benefits
- E. Certain retirement funds and accounts
- F. Certain veteran and armed forces benefits
- G. Certain insurance proceeds
- H. Such other exemptions as may be provided by law

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TD BANK USA, N.A., AS SUCCESSOR IN INTEREST TO ) 201b-CV-3249-NT  
TARGET NATIONAL BANK )  
Plaintiff ) NO. 07-628-CD  
v. )  
STEPHANIE E JACKSON )  
1109 Kathryn St Boalsburg Pa 16827 )  
Defendant )  
PSECU )  
1 Credit Union Place Harrisburg Pa 17110 )  
Garnishee )

CLAIM FOR EXEMPTION  
TO THE SHERIFF:

I, the above named defendant, 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 \$300 statutory exemption be \_\_\_\_\_  
(i) set aside in kind (specify the property to be set aside in kind): \_\_\_\_\_

\_\_\_\_\_  
(ii) paid in cash following the sale of the property levied upon; or  
(b) I claim the following exemption (specify property and basis of exemption): \_\_\_\_\_

(2) From my property which is in the possession of a third party, I claim the following exemptions:

(a) my \$300 statutory exemption be \_\_\_\_\_ in cash; \_\_\_\_\_ in kind (specify the property to be set aside in kind): \_\_\_\_\_  
(b) other (specify the amount and the basis of the exemption): \_\_\_\_\_

I request a prompt hearing to determine the exemption. Notice of the hearing should be given to 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 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

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

Defendant

THIS CLAIM TO BE FILED WITH  
THE OFFICE OF THE SHERIFF  
OF DAUPHIN COUNTY  
HARRISBURG PA 17101

I request a prompt hearing to determine the exemption. Notice of the hearing should be given to 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 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

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

Defendant

THIS CLAIM TO BE FILED WITH  
THE OFFICE OF THE SHERIFF  
OF DAUPHIN COUNTY  
HARRISBURG PA 17101

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

APR 21 2016

A TRUE COPY

ATTEST: *Dick. Spur*

PROTHONOTARY-CLERK

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TD BANK USA, N.A., AS SUCCESSOR IN INTEREST TO )  
TARGET NATIONAL BANK )

Plaintiff )

v. )

STEPHANIE E JACKSON )  
1109 Kathryn St Boalsburg Pa 16827 )  
Defendant )

PSECU )  
1 Credit Union Place Harrisburg Pa 17110 )  
Garnishee )

2016-CV-3249-NT

NO. 07-628-CD

2016 APR 29 AM 10:50  
PROTHONOTARY  
DAUPHIN COUNTY  
PENNA

PRAECIPE FOR WRIT OF  
EXECUTION

Filed on behalf of:

TD BANK USA, N.A., AS  
SUCCESSOR IN INTEREST TO  
TARGET NATIONAL BANK

Counsel of Record for This Party:

Gregg L. Morris, Esquire  
Pa I.D. #69006

Patenaude & Felix, A.P.C.  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675

I HEREBY CERTIFY THAT  
THIS IS A TRUE AND  
CORRECT COPY OF  
THE ORIGINAL AS FILED.

*[Signature]*  
GREGG L. MORRIS, ESQUIRE

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TD BANK USA, N.A., AS SUCCESSOR IN INTEREST TO )  
TARGET NATIONAL BANK )

2016-CV-3249-NT  
NO. 07-628-CD

Plaintiff )

v. )

STEPHANIE E JACKSON )

1109 Kathryn St Boalsburg Pa 16827 )

Defendant )

PSECU )

1 Credit Union Place Harrisburg Pa 17110 )

Garnishee )

**PRAECIPE FOR WRIT OF EXECUTION**

To The Prothonotary:

Issue writ of execution in the above matter,

- (1) directed to the Sheriff of DAUPHIN County;
- (2) against, STEPHANIE E JACKSON Defendant;
- (3) against, PSECU, Garnishee;
- (4) and index this writ
  - (a) against, Defendant STEPHANIE E JACKSON, Defendant; and
  - (b) against PSECU, Garnishee;

as a *lis pendens* against personal property of the Defendant in the name of the garnishee as follows:

(5) Amount due	<u>\$2,576.25</u>
Interest from October 18, 2007	<u>\$1299.06</u>
At 6.00 % per annum on \$2,576.25	<u>\$0.00</u>
Court Cost	<u>\$0.00</u>
Less: Payment	<u>\$3875.31</u>
Total	

Attorney for Plaintiff

**FILED**

2016 MAY 13 AM 9:28

BRIAN K. SPENCER  
PROTHONOTARY &  
CLERK OF COURTS

DAUPHIN COUNTY  
SHERIFF'S OFFICE  
HARRISBURG, PA 17101

2016 APR 29 AM 11:46

**RECEIVED**