

207-676-CD

Great Seneca vs J. Bertrand

Great Seneca et al vs Joyce Bertrand et al  
207-676-CD

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

GREAT SENECA FINANCIAL CORPORATION  
ASSIGNEE OF NCOP CAPITAL, INC.  
ASSIGNEE OF CITIBANK

Plaintiff

No. 07-676-CD

vs.

CIVIL ACTION - LAW

JOYCE A BERTRAND  
Defendant(s)

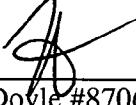
**PRAECIPE FOR ENTRY OF EXEMPLIFIED JUDGMENT**

To the Prothonotary:

Please enter the attached Exemplified record as a civil judgment.

Respectfully Submitted,

Date: 4/13/07

  
Amy F. Doyle #87062 / Daniel F. Wolfson #20617  
Philip C. Warholic #86341 / David R. Galloway #87326  
Tonilyn M. Chippie #87852 / Sarah E. Ehasz #86469  
Robert N. Polas, Jr. #201259 / Bruce H. Cherkis #18837  
Ronald S. Canter #94000 / Ronald M. Abramson #94266  
WOLPOFF & ABRAMSON, L.L.P.  
Attorneys in the Practice of Debt Collection  
One Oxford Centre, 301 Grant Street, Suite 4300  
Pittsburgh, PA 15219  
Telephone: (800) 758-0675  
Counsel for Plaintiff

W&A File No. 126738569

**FILED** *Plff pd.*  
*4/14/07* 20.00  
APR 27 2007  
*W.A.S.* ICC Notice  
to Def.  
William A. Shaw  
Prothonotary/Clerk of Courts  
Statement to  
Atty  
*Atty*

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

GREAT SENECA FINANCIAL CORPORATION  
ASSIGNEE OF NCOP CAPITAL, INC.  
ASSIGNEE OF CITIBANK

Plaintiff

No. 07-676-CD

vs.

JOYCE A BERTRAND  
Defendant(s)

CIVIL ACTION - LAW

PRAECIPE FOR JUDGMENT

Please enter Judgment in favor of Plaintiff and against Defendant(s), Joyce A Bertrand , pursuant to the attached Exemplified Judgment Record.

(X)	Amount due	\$8,540.74
	TOTAL	\$8,540.74, plus interest and costs

(X) I certify that the foregoing assessment of damages is for specified amounts alleged to be due in the complaint and is calculable as a sum certain from the complaint.

(X) Pursuant to Pa.R.C.P. 237 (Notice of Praecipe for final judgment or decree), I certify that a copy of this praecipe has been mailed to each other party who has appeared in the action or to his/her Attorney of Record.

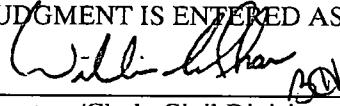
(X) Pursuant to Pa.R.C.P. 237.1, I certify that written notice of the intention to file this praecipe was mailed or delivered to the party against whom judgment is to be entered and to his/her Attorney of Record, if any, after the default occurred and at least ten days prior to the date of the filing of this praecipe and a copy of the notice is attached.

Date: 4/13/07



Amy F. Doyle #87062 / Daniel F. Wolfson #20617  
Philip C. Warholic #86341 / David R. Galloway #87326  
Tonilyn M. Chippie #87852 / Sarah E. Ehasz #86469  
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Ronald S. Canter #94000 / Ronald M. Abramson #94266  
WOLPOFF & ABRAMSON, L.L.P.  
Attorneys in the Practice of Debt Collection  
One Oxford Centre, 301 Grant Street, Suite 4300  
Pittsburgh, PA 15219  
Telephone: (800) 758-0675  
Counsel for Plaintiff

NOW, April 27, 2007, JUDGMENT IS ENTERED AS ABOVE.



\_\_\_\_\_  
Prothonotary/Clerk, Civil Division

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

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

GREAT SENECA FINANCIAL CORPORATION  
ASSIGNEE OF NCOP CAPITAL, INC.

ASSIGNEE OF CITIBANK

Plaintiff

No.

VS

CIVIL ACTION - LAW

JOYCE A BERTRAND

Defendant(s)

CERTIFICATE OF RESIDENCE  
PA. R.C.P. 236

I hereby certify that the precise address of Plaintiff is:

Great Seneca Financial Corporation  
P.O. Box 1651  
Rockville MD 20849-1651

and certify that the last known address of the within Defendant(s) is:

Joyce A Bertrand  
163 Center St # 3  
Millsboro PA 15348

Date: 4/13/08



---

Amy F. Doyle #87062 / Daniel F. Wolfson #20617  
Philip C. Warholic #86341 / David R. Galloway #87326  
Tonilyn M. Chippie #87852 / Sarah E. Ehasz #86469  
Robert N. Polas, Jr. #201259 / Bruce H. Cherkis #18837  
Ronald S. Canter #94000 / Ronald M. Abramson #94266  
WOLPOFF & ABRAMSON, L.L.P.  
Attorneys in the Practice of Debt Collection  
One Oxford Centre, 301 Grant Street, Suite 4300  
Pittsburgh, PA 15219  
Telephone: (800) 758-0675  
Counsel for Plaintiff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

GREAT SENECA FINANCIAL CORPORATION  
ASSIGNEE OF NCOP CAPITAL, INC.  
ASSIGNEE OF CITIBANK

Plaintiff

NO.

CIVIL ACTION – LAW

vs.

JOYCE A BERTRAND  
Defendant(s)

AFFIDAVIT OF FOREIGN JUDGMENTS

Commonwealth of Pennsylvania :  
:ss.  
County of CLEARFIELD :

AND NOW, TO WIT, this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, comes the undersigned  
who being duly sworn according to law, deposes and says that they are the Attorney for the Plaintiff in  
the above-captioned action; that the judgment is valid, enforceable and unsatisfied.



Amy F. Doyle #87062 / Daniel F. Wolfson #20617  
Philip C. Warholic #86341 / David R. Galloway #87326  
Tonilyn M. Chippie #87852 / Sarah E. Ehasz #86469  
Robert N. Polas, Jr. #201259 / Bruce H. Cherkis #18837  
Ronald S. Canter #94000 / Ronald M. Abramson #94266  
WOLPOFF & ABRAMSON, L.L.P.  
Attorneys in the Practice of Debt Collection  
4660 Trindle Road, Suite 300  
Camp Hill, PA 17011  
Telephone: (717) 303-6700  
Counsel for Plaintiff

SWORN and SUBSCRIBED to  
before me this \_\_\_\_\_ day  
of \_\_\_\_\_, 20\_\_\_\_.

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

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

GREAT SENECA FINANCIAL CORPORATION  
ASSIGNEE OF NCOP CAPITAL, INC.  
ASSIGNEE OF CITIBANK  
Plaintiff

No.

VS

CIVIL ACTION - LAW

JOYCE A BERTRAND  
Defendant(s)

AFFIDAVIT OF NON-MILITARY SERVICE

COMMONWEALTH OF PENNSYLVANIA : :

COUNTY OF CLEARFIELD : :

The undersigned counsel, being duly sworn according to law, depose and say that I am the Attorney for the Plaintiff in the above-captioned matter, and that to the best of my knowledge, information and belief Defendant, Joyce A Bertrand, above-named, is over 21 years of age; is last known to reside at 163 Center St # 3 Millsboro, County of Washington, Pennsylvania; is not in the military service of the United States or its Allies, or otherwise within the provisions of the Servicemembers Civil Relief Act and its Amendments.

Date: 4/13/07

A  
Amy F. Doyle #87062 / Daniel F. Wolfson #20617  
Philip C. Warholic #86341 / David R. Galloway #87326  
Tonilyn M. Chippie #87852 / Sarah E. Ehasz #86469  
Robert N. Polas, Jr. #201259 / Bruce H. Cherkis #18837  
Ronald S. Canter #94000 / Ronald M. Abramson #94266  
WOLPOFF & ABRAMSON, L.L.P.  
Attorneys in the Practice of Debt Collection  
One Oxford Centre, 301 Grant Street, Suite 4300  
Pittsburgh, PA 15219  
Telephone: (800) 758-0675  
Counsel for Plaintiff

SWORN and SUBSCRIBED to before me this 13<sup>th</sup> day of April, 2007

Amy R. Wise  
Notary Public

IN THE COURT OF COMMON PLEAS OF WASHINGTON COUNTY, PENNSYLVANIA  
OFFICE OF THE PROTHONOTARY

GREAT SENECA FINANCIAL CORPORATION  
ASSIGNEE OF NCOP CAPITAL, INC.  
ASSIGNEE OF CITIBANK,  
Plaintiff,  
vs.  
No. 2006-2882 Term, 19.....  
JOYCE A. BERTRAND, Defendant.

**CERTIFICATION OF DOCKET ENTRIES AND JUDGMENT**

I, PHYLLIS RANKO MATHENY of the Court of Common Pleas of Washington County, Pennsylvania, do hereby certify that the following is a true, correct and full copy of the docket entries in the above captioned case:

I further certify that judgment was entered in favor of GREAT SENECA FINANCIAL CORPORATION, ASSIGNEE OF NCOP CAPITAL, INC., ASSIGNEE OF CITIBANK and against JOYCE A. BERTRAND on the 17th day of July 2006, in the above captioned case in the amount of \$ 8,540.74.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the Seal of the said Court, on the 2nd day of March A. D. 2007

Phyllis Ranko Matheny (DC)  
PROTHONOTARY  
BY: Judy Gater (DC)  
DEPUTY

PHYLLIS RANKO MATHENY, PROTHONOTARY  
My Term Expires First Monday in January, 2008

No. 2006-2882, 19.....

GREAT SENECA FINANCIAL CORPORATION, ET. AL.,

Plaintiff,

vs.

JOYCE A. BERTRAND,

Defendant.

**CERTIFICATION OF DOCKET  
ENTRIES AND JUDGMENT**

JUDGMENT - - - \$ 8,540.74

Int. from - - - - -

Washington Co. Costs \$ 187.16

This Record - - - \$ 10.00.....

TONILYN M. CHIPPIE, ESQUIRE

Attorney for Plaintiff

Court of Common Pleas of Washington County  
Commonwealth of Pennsylvania

Full Docket Print for Case #: C-63-CV-200602882

Case Title: GREAT SENECA VS BERTRAND  
Case Type: COMPLAINT-ARBITRATION  
Status: ARBITRATION LST

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Party Details

PLAINTIFF # 1	GREAT SENECA FINANCIAL CORPORATION PO BOX 1651 ROCKVILLE, MD 20849	
Attorney #: 87326	GALLOWAY DAVID R 4660 TRINDLE RD 3RD FLOOR CAMP HILL, PA 17011	PRIVATE COUNSEL
PLAINTIFF # 2	NCOP CAPITAL INC PO BOX 1651 ROCKVILLE, MD 20849	
Attorney #: 87326	GALLOWAY DAVID R 4660 TRINDLE RD 3RD FLOOR CAMP HILL, PA 17011	PRIVATE COUNSEL
PLAINTIFF # 3	CITIBANK PO BOX 1651 ROCKVILLE, MD 20849	
Attorney #: 87326	GALLOWAY DAVID R 4660 TRINDLE RD 3RD FLOOR CAMP HILL, PA 17011	PRIVATE COUNSEL
DEFENDANT # 1	BERTRAND JOYCE A 163 CENTER ST #3 MILLSBORO, PA 15348	

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Event Summary

04/26/2006 4591 3 COMPLAINT-ARBITRATION  
05/22/2006 4184 1 SERVED  
07/17/2006 4068 2 JUDGMENT ENTERED IN FAVOR OF  
07/17/2006 4091 3 NOTICE OF JUDG SENT-ORD MAIL

JOYCE A. BERTRAND ON 05-19-06.  
THE PLTF. AND AGAINST THE DEFT. (DEFUALT) IN  
THE AMOUNT OF  
\$8,540.74 PLUS INTEREST AND COSTS. AFFIDAVIT  
OF NON-  
MILITARY SERVICE RECEIVED.

Judgment Summary

Judgment seq:	1	Judgement Amt:	\$ 8,540.74
Judgement Date:	7/17/2006	Judgement Code:	DEF

Judgement Text: THE PLTF. AND AGAINST THE DEFT. (DEFUALT) IN THE AMOUNT OF

Party Details

In favor of Party P 1	GREAT SENECA FINANCIAL CORPORATION	(C)orp or (P)erson: C
In favor of Party P 1	GREAT SENECA FINANCIAL CORPORATION	(C)orp or (P)erson: C
In favor of Party P 1	GREAT SENECA FINANCIAL CORPORATION	(C)orp or (P)erson: C
In favor of Party P 2	NCOP CAPITAL INC	(C)orp or (P)erson: C
In favor of Party P 2	NCOP CAPITAL INC	(C)orp or (P)erson: C

Court of Common Pleas of Washington County  
Commonwealth of Pennsylvania

Full Docket Print for Case #:

C-63-CV-200602882

In favor of Party P 2	NCOP CAPITAL INC	(C)orp or (P)erson: C
In favor of Party P 3	CITIBANK	(C)orp or (P)erson: C
In favor of Party P 3	CITIBANK	(C)orp or (P)erson: C
In favor of Party P 3	CITIBANK	(C)orp or (P)erson: C
Against Party D 1	BERTRAND JOYCE A	(C)orp or (P)erson: P
Against Party D 1	BERTRAND JOYCE A	(C)orp or (P)erson: P
Against Party D 1	BERTRAND JOYCE A	(C)orp or (P)erson: P

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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

GREAT SENECA FINANCIAL CORPORATION  
ASSIGNEE OF NCOP CAPITAL, INC.  
ASSIGNEE OF CITIBANK

Plaintiff

No. 07-676-CD

vs.

CIVIL ACTION - LAW

JOYCE A BERTRAND  
Defendant(s)

NOTICE OF JUDGMENT

( x ) Notice is hereby given that a Judgment in the above-captioned matter has been entered against you in the amount of \$8,540.74, plus interest, on April 27, 2007.

( x ) A copy of all documents filed with the Prothonotary in support of the within judgment is/are attached.

By: Will. H. Chang

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

Date: 4/13/07

  
Amy F. Doyle #87062 / Daniel F. Wolfson #20617  
Philip C. Warholic #86341 / David R. Galloway #87326  
Tonilyn M. Chippie #87852 / Sarah E. Ehasz #86469  
Robert N. Polas, Jr. #201259 / Bruce H. Cherkis #18837  
Ronald S. Canter #94000 / Ronald M. Abramson #94266  
WOLPOFF & ABRAMSON, L.L.P.  
Attorneys in the Practice of Debt Collection  
One Oxford Centre, 301 Grant Street, Suite 4300  
Pittsburgh, PA 15219  
Telephone: (800) 758-0675  
Counsel for Plaintiff

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

NOTICE SENT TO: Joyce A Bertrand  
163 Center St # 3  
Millsboro PA 15348

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

COPIED

Great Seneca Financial Corporation  
NCOP Capital, Inc.  
Citibank  
Plaintiff(s)

No.: 2007-00676-CD

Real Debt: \$8,540.74

Atty's Comm: \$

Vs. Costs: \$

Int. From: \$

Joyce A. Bertrand  
Defendant(s)

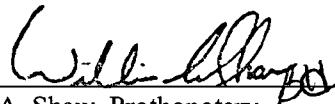
Entry: \$20.00

Instrument: Transferred Judgment-  
Washington Co., PA No. 2006-2882

Date of Entry: April 27, 2007

Expires: April 27, 2012

Certified from the record this 27th day of April, 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

PRAECIPE FOR WRIT OF EXECUTION (MONEY JUDGMENT)  
P.R.C.P. 3101 to 3149

~~GREAT SENDER FINANCIAL CORP~~  
ASSIGNEE OF NCOP CAPITAL, INC.  
ASSIGNEE OF CITIBANK

Plaintiff

vs.

JOYCE A BERTRAND

Defendant(s)

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

William A. Shaw  
Prothonotary/Clerk of Courts  
Atty pd. 20.00  
40099 Writs to  
Sheriff

JUDGMENT NO. 07-676-CD

PRAECIPE FOR WRIT OF EXECUTION  
(MONEY JUDGMENT)

To the Prothonotary: Please issue the Writ of Execution in the above-captioned matter, in the amount of \$8,540.74.

- (1) Directed to the Sheriff of CLEARFIELD County, Pennsylvania;
- (2) against, JOYCE A BERTRAND located at 163 CENTER ST # 3, MILLSBORO, PA 15348, Defendant (s);
- (3) and against, M&T BANK located at 621 SPRING ST, HOUTZDALE, PA 16651, Garnishee (s);
- (4) and index this writ  
(a) against, JOYCE A BERTRAND, Defendant (s) and  
(b) against, M&T BANK, Garnishee (s),

as a lis pendens against the real property of the Defendant (s) in the name of the Garnishee (s) as follows:  
(Specifically describe property) 163 CENTER ST # 3

MILLSBORO, PA 15348

All personal property of any nature located within the household or immediate vicinity of the Defendant(s) address and all other personal property within the dominion and control of the Defendant(s) wherever it is located shall be subject to the levy.

ALSO: You are directed to attach the property of the Defendant (s) not levied upon in the possession of  
M&T BANK located at 621 SPRING ST, HOUTZDALE, PA 16651, Garnishee (s)

All accounts including but not limited to all savings, checking and other accounts, certificates of deposit, notes receivables, collateral, pledges, documents of title, securities, coupons and safe deposit boxes.

Amount due	\$8,540.74
Interest from 4/27/2007	To Be Determined
At an interest rate of 6% per year	

Total \$8,540.74 Plus costs & interest  
40.00 Prothonotary costs

Date: 6/29/07

  
Amy F. Doyle #87062 / Daniel F. Wolfson #20617  
Philip C. Warholic #86341 / David R. Galloway #87326  
Tonilyn M. Chippie #87852 / Sarah E. Ehasz #86469  
Robert N. Polas, Jr. #201259 / Bruce H. Cherkis #18837  
Ronald S. Canter #94000 / Ronald M. Abramson #94266  
Wolpoff & Abramson, L.L.P.  
Attorneys in the Practice of Debt Collection  
4660 Trindle Road, Suite 300  
Camp Hill, PA 17011  
Telephone: (717) 303-6700  
Counsel for Plaintiff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

GREAT SENECA FINANCIAL CORP.  
ASSIGNEE OF NCOP CAPITAL, INC.  
ASSIGNEE OF CITIBANK

Plaintiff

No. 07-676-CD

VS

CIVIL ACTION - LAW

JOYCE A BERTRAND

Defendant(s)

INTERROGATORIES TO GARNISHEE IN AID OF EXECUTION

TO: M&T BANK  
621 SPRING ST  
HOOTZDALE, PA 16651

PURSUANT TO RULE 3253 OF THE RULES OF CIVIL PROCEDURE, THE FOLLOWING  
INTERROGATORIES HAVE BEEN SERVED UPON YOUR INSTITUTION. GARNISHEE IS HEREBY REQUIRED  
TO ANSWER EACH OF THE FOLLOWING INTERROGATORIES SEPARATELY AND FULLY. PLEASE  
COMPLETE THE FOLLOWING INTERROGATORIES TO ASSIST THE CREDITOR'S EFFORTS TO SATISFY  
THE LAWFUL OBLIGATION OF THE ABOVE REFERENCED DEBTOR(S).

IMPORTANT NOTICES AND INSTRUCTIONS TO GARNISHEE

A. You are required to file answers to the following interrogatories within twenty (20) days after service  
upon you. Failure to do so may result in judgment against you.

B. The term "Defendant(s)" means the individual(s) or entity against whom the Writ of Execution was  
issued.

C. "You" means the main office and all branch offices, representatives, employees, and agents of your  
organization.

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

E. These Interrogatories are considered to be continuing and therefore should be modified or supplemented  
as you receive further or additional information.

F. Where exact information cannot be furnished, estimated information is to be supplied. When an estimate  
is to be used, it should be identified as such; and an explanation should be given as to the basis on which the estimate is  
made, and the reason the exact information cannot be furnished.

G. Where knowledge or information in possession of a party is requested, such request includes knowledge  
of the party's agents, representatives, and attorneys.

PLAINTIFF'S INTERROGATORIES TO GARNISHEE  
DEFENDANT(S) - JOYCE A BERTRAND

1. DEPOSITORY ACCOUNTS: At the time you were served or at any subsequent time, state whether or not the Defendant(s) maintains any checking, savings, lines of credit, certificate of deposit's or other depository accounts with your institution. If so, state the identification numbers of those accounts, and the amount or amounts the Defendant(s) has in each account. If the Defendant(s) maintains any of these jointly with any other person, or persons, give their name and address.

1A. DIRECT DEPOSIT ACCOUNTS: Are any of the accounts you have listed above direct deposit accounts? If yes, please state the identification numbers of those accounts.

2. 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.

3. 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.

4. TRANSFER OF PROPERTY: At any time after you were served did you pay, transfer or deliver any money or property to the defendant or to any person or place pursuant to the defendant's direction or otherwise discharge any claim of the defendant against you?

5. SAFE DEPOSIT BOXES: At the time you were served or at any subsequent time, state whether or not the Defendant(s) maintains any safe deposit box or boxes. If so, include the identification number or other designation of the box or boxes. Include a full description of the contents and also the amount of cash among those contents. If the Defendant(s) maintains any of these jointly with any other person or persons give their full name and address.

6. REAL OR PERSONAL PROPERTY: At the time you were served or at any subsequent time, state whether or not Defendant(s) owns any personal property that was in your possession and/or control. If so, include a full description of all personal property giving full value and present location. State also whether or not there are any encumbrances or liens holders, the present balance of the encumbrance. State where and when the encumbrances or liens was recorded. If the Defendant(s) owns any personal property jointly with any person or persons, give names and address.

7. OTHER ASSETS: At the time you were served or at any subsequent time, did you know of the existence of any other asset(s) of the Defendant(s) which are not disclosed in the preceding Interrogatories. If so, please set forth all details concerning those asset.

8. PROPERTY HELD AS A FIDUCIARY: At the time you were served or at any subsequent time, did you hold as a fiduciary any property in which any Defendant(s) had an interest? If so, please describe for each Defendant(s) the nature of the property including its value and the interest of Defendant(s).

9. FEES OUTSTANDING TO GARNISHEE: Are there any attorneys fees or processing fees charged by you against the Defendant(s) or account(s) of the Defendant(s) for the completion of this Answer. If yes, outline the exact amount of any fees due and owing to the garnishee or the attorney for the garnishee for the preparation of the Answer.

Date: 6/29/02

  
Amy F. Doyle #87062 / Daniel F. Wolfson #20617  
Philip C. Warholic #86341 / David R. Galloway #87326  
Tonilyn M. Chippie #87852 / Sarah E. Ehasz #86469  
Robert N. Polas, Jr. #201259 / Bruce H. Cherkis #18837  
Ronald S. Canter #94000 / Ronald M. Abramson #94266  
Wolpoff & Abramson, L.L.P.  
Attorneys in the Practice of Debt Collection  
4660 Trindle Road, Suite 300  
Camp Hill, PA 17011  
Telephone: (717) 303-6700  
Counsel for Plaintiff

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

Great Seneca Financial Corporation,  
Assignee of NCOP Capital, Inc.,  
Assignee of Citibank

**COPY**

Vs.

NO.: 2007-00676-CD

Joyce A. Bertrand

M & T Bank  
Garnishee

**TO THE SHERIFF OF CLEARFIELD COUNTY:**

To satisfy the judgment, interest and costs against GREAT SENECA FINANCIAL CORPORATION, Assignee of NCOP CAPITAL, INC., Assignee of CITIBANK, Plaintiff(s) from JOYCE A. BERTRAND, Defendant(s):

- (1) You are directed to levy upon the property of the defendant(s) and to sell defendant's interest(s) therein:  
All personal property of any nature located within the household or immediate vicinity of the Defendant's address and all other personal property within the dominion and control of the Defendant wherever it is located shall be subject to the levy.
- (2) You are also directed to attach the property of the defendant(s) not levied upon in the possession of:  
M & T Bank as garnishee(s): All accounts including but not limited to all savings, checking and other accounts, certificates of deposit, notes receivables, collateral, pledges, documents of title, securities, coupons and safe deposit boxes.  
and to notify the garnishee(s) that: (a) an attachment has been issued; (b) except as provided in paragraph (c), the garnishee(s) is/are enjoined from paying any debt to or for the account of the defendant(s) and from delivering any property of the defendant(s) or otherwise disposing thereof; (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 (ii) 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(s) not levied upon and subject to attachment is found in the possession of anyone other than a named garnishee, you are directed to notify such other person that he or she has been added as a garnishee and is enjoined as above stated.
- (4) **If Social Security or Supplemental Income funds are directly deposited into an account of the defendant, the levy and attachment shall not include any funds that may be traced to Social Security direct deposits. In addition, the levy and attachment shall not include \$300.00 in the account of the defendant.**

AMOUNT DUE/PRINCIPAL: \$8,540.74  
INTEREST FROM 4/27/2007 at an interest rate  
of 6% per year: To Be Determined  
ATTY'S COMM: \$

PROTH. COSTS PAID: \$40.00

SHERIFF: \$

OTHER COSTS: \$

DATE: 07/09/2007



William A. Shaw  
Prothonotary/Clerk Civil Division

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

Sheriff

Requesting Party: David R. Galloway, Esq.  
4660 Trindle Rd., Ste. 300  
Camp Hill, PA 17011  
(717) 303-6700

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20637  
NO: 07-676-CD

PLAINTIFF: GREAT SENECA FINANCIAL CORP ASSIGNEE OF NCOP CAPITAL, INC. ASSIGNEE OF CITIBANK  
vs.  
DEFENDANT: JOYCE A. BERTRAND

Execution PERSONAL PROPERTY / INTERROGATORIES

**SHERIFF RETURN**

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DATE RECEIVED WRIT: 07/09/2007

LEVY TAKEN @

POSTED @

SALE HELD

SOLD TO

SOLD FOR AMOUNT PLUS COSTS

WRIT RETURNED 08/23/2007

DATE DEED FILED

PROPERTY ADDRESS 163 CENTER STREET #3 MILLSBORO , PA 15348

**SERVICES**

@ SERVED JOYCE A. BERTRAND

ATTORNEY WILL INDEX EXECUTON IN WASHINGTON COUNTY.

08/22/2007 @ 9:08 AM SERVED M & T BANK

SERVED M&T BANK, GARNISHEE, BY HANDING TO CHERYL PERNA, TELLER FOR M&T BANK, AT HER PLACE OF EMPLOYMENT M&T BANK, 621 SPRING STREET, HOUTZDALE, CLEARFIELD COUNTY, PENNSYLVANIA

A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION AND INTERROGATORIES TO GARNISHEE AND BY MAKING KNOWN TO HER THE CONTENTS THEREOF.

*FILED  
08/24/2007  
AUG 23 2007  
WAS  
William A. Shaw  
Prothonotary/Clerk of Courts*

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

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Execution PERSONAL PROPERTY / INTERROGATORIES

**SHERIFF RETURN**

---

SHERIFF HAWKINS \$47.10

SURCHARGE \$10.00 PAID BY ATTORNEY

Sworn to Before Me This

So Answers,

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

*Chester Hawkins*  
*Joy Cynthia Butler-Clephane-C*  
Chester A. Hawkins  
Sheriff

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

Great Seneca Financial Corporation,  
Assignee of NCOP Capital, Inc.,  
Assignee of Citibank

Vs.

NO.: 2007-00676-CD

Joyce A. Bertrand

M & T Bank  
Garnishee

**TO THE SHERIFF OF CLEARFIELD COUNTY:**

To satisfy the judgment, interest and costs against GREAT SENECA FINANCIAL CORPORATION, Assignee of NCOP CAPITAL, INC., Assignee of CITIBANK, Plaintiff(s) from JOYCE A. BERTRAND, Defendant(s):

- (1) You are directed to levy upon the property of the defendant(s) and to sell defendant's interest(s) therein:  
All personal property of any nature located within the household or immediate vicinity of the Defendant's address and all other personal property within the dominion and control of the Defendant wherever it is located shall be subject to the levy.
- (2) You are also directed to attach the property of the defendant(s) not levied upon in the possession of:  
M & T Bank as garnishee(s): All accounts including but not limited to all savings, checking and other accounts, certificates of deposit, notes receivables, collateral, pledges, documents of title, securities, coupons and safe deposit boxes.  
and to notify the garnishee(s) that: (a) an attachment has been issued; (b) except as provided in paragraph (c), the garnishee(s) is/are enjoined from paying any debt to or for the account of the defendant(s) and from delivering any property of the defendant(s) or otherwise disposing thereof; (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 (ii) 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(s) not levied upon and subject to attachment is found in the possession of anyone other than a named garnishee, you are directed to notify such other person that he or she has been added as a garnishee and is enjoined as above stated.
- (4) If Social Security or Supplemental Income funds are directly deposited into an account of the defendant, the levy and attachment shall not include any funds that may be traced to Social Security direct deposits. In addition, the levy and attachment shall not include \$300.00 in the account of the defendant.

AMOUNT DUE/PRINCIPAL: \$8,540.74  
INTEREST FROM 4/27/2007 at an interest rate  
of 6% per year: To Be Determined  
ATTY'S COMM: \$

PROTH. COSTS PAID: \$40.00

SHERIFF: \$

**OTHER COSTS: \$**

DATE: 07/09/2007

William Shaffer

William A. Shaw  
Prothonotary/Clerk Civil Division

Received this writ this 9th day  
of July A.D. 2011  
At 2:50 A.M./P.M.

Requesting Party: David R. Galloway, Esq.  
4660 Trindle Rd., Ste. 300  
Camp Hill, PA 17011  
(717) 303-6700

**PERSONAL PROPERTY SALE  
SCHEDULE OF DISTRIBUTION**

NAME JOYCE A. BERTRAND NO. 07-676-CD

NOW, August 23, 2007, by virtue of the Writ hereunto attached, after having given due and legal notice of time and place of sale by handbills posted on the premises setting forth the date, time and place of sale, I exposed the within described real estate of Joyce A. Bertrand to public venue or outcry at which time and place I sold the same to he/she being the highest bidder, for the sum of and made the following appropriations, viz:

## **SHERIFF COSTS:**

## **PLAINTIFF COSTS, DEBT AND INTEREST:**

RDR	9.00	DEBT-AMOUNT DUE	
SERVICE	9.00	INTEREST @ %	0.00
MILEAGE	17.46	FROM TO	
LEVY			
MILEAGE		PROTH SATISFACTION	
POSTING		LATE CHARGES AND FEES	
HANDBILLS		COST OF SUIT-TO BE ADDED	
COMMISSION	0.00	FORECLOSURE FEES	
POSTAGE	1.64	ATTORNEY COMMISSION	
HANDBILLS		REFUND OF ADVANCE	10.00
DISTRIBUTION		REFUND OF SURCHARGE	
ADVERTISING		SATISFACTION FEE	
ADD'L SERVICE		ESCROW DEFICIENCY	
ADD'L POSTING		PROPERTY INSPECTIONS	
ADD'L MILEAGE		INTEREST	
ADD'L LEVY		MISCELLANEOUS	
BID AMOUNT		TOTAL DEBT AND INTEREST	\$57.10
RETURNS/DEPUTIZE			
COPIES	5.00	COSTS:	
BILLING/PHONE/FAX	5.00	ADVERTISING	0.00
CONTINUED SALES		TAXES - COLLECTOR	
MISCELLANEOUS		TAXES - TAX CLAIM	
TOTAL SHERIFF COSTS	\$47.10	DUE	
		LIEN SEARCH	
		ACKNOWLEDGEMENT	
		SHERIFF COSTS	47.10
		LEGAL JOURNAL COSTS	0.00
		PROTHONOTARY	
		MORTGAGE SEARCH	
		MUNICIPAL LIEN	
		TOTAL COSTS	\$47.10
		TOTAL COSTS	\$57.10

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

CHESTER A. HAWKINS, Sheriff

CLEARFIELD COUNTY

FILED  
M 11 14 2001  
AUG 30 2001  
NO CC  
GP

Re: **Writ of Garnishment on Garnishee received by  
Manufacturers and Traders Trust Company, Garnishee  
Great Seneca Financial Corp. Vs Joyce Bertrand  
No. 07-676-CD**

William A. Shaw  
Prothonotary/Clerk of Courts

**Responses to Interrogatories**

MANUFACTURERS AND TRADERS TRUST COMPANY, *pro se*, for its answer to the Interrogatories states:

**[Questions and Answers Pursuant to 14 Pa C.S.A. Rule 3253]**

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 any money or were liable to defendant(s) for any reason?

Answer: **NO** Yes #  
**No open accounts**  
Denies knowledge or information sufficient to form a belief as to the answer to the question.

2. At the time you were served or at any subsequent time, was there in your possession, custody or control or in the joint possession, custody or control of yourself or one or more other persons any property of any nature owned solely or in part by the defendant(s)?

Answer:  Yes  
 No  
 Denies knowledge or information sufficient to form a belief as to the answer to the question.

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

Answer:  Yes  
 No  
 Denies knowledge or information sufficient to form a belief as to the answer to the question.

4. At any time you were served or at any subsequent time, did you hold as a fiduciary any property in which the defendant(s) had an interest?

Answer:  Yes  
 No  
 Denies knowledge or information sufficient to form a belief as to the answer to the question.

**M & T BANK  
HAS NO OPEN ACCOUNTS  
FOR ABOVE NAMED**

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 direction or consent and, if so, what was the consideration therefor?

Answer:  Yes. The consideration was \_\_\_\_\_

No  
 Denies knowledge or information sufficient to form a belief as to the answer to the question.

6. At the time you were served or at any subsequent time, did you pay, transfer or deliver any money or property to the defendant(s) or to any person or place pursuant to the direction of defendant(s) against you?

Answer:  Yes

No  
 Denies knowledge or information sufficient to form a belief as to the answer to the question.

**[Additional Questions and Answer (if any)]**

If any of the following reasons are checked, the account(s) in question are not subject to attachment because:

Account(s) No(s). \_\_\_\_\_  
are escrow account(s) for real estate taxes and insurance.

[Field 12] has a right of set off against the account(s) which it hereby elects to assert.

Other: [Consult with Counsel's Office and type in reason]

MANUFACTURERS AND TRADERS  
TRUST COMPANY

Dated: AUG 28 2007  
By: Lorrie Maska  
Name: Lorrie Maska  
Title: Legal Document Analyst  
M&T Bank - Legal Document Processing  
PO Box 844  
Buffalo New York 14240  
Phone (716) 635-7721  
Fax (716)635-7725

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES ACQUISITION XVI, LLC  
ASSIGNEE OF GREAT SENECA FINANCIAL CORP.  
ASSIGNEE OF NCOP CAPITAL, INC.  
ASSIGNEE OF CITIBANK

No. 07-676-CD

Plaintiff

VS

CIVIL ACTION - LAW

JOYCE A BERTRAND

Defendant(s)

**PRAECIPE TO DISCONTINUE ATTACHMENT EXECUTION**

To the Prothonotary:

Kindly mark the attachment against the Garnishee, M&T BANK, discontinued, upon payment of your costs only.

Respectfully Submitted,

Date: 12/6/07

  
Amy F. Doyle #87062 / Daniel E. Wolfson #20617  
Philip C. Warholic #86341 / David R. Galloway #87326  
Tonilyn M. Chippie #87852 / Sarah E. Ehasz #86469  
Robert N. Polas, Jr. #201259 / Ronald S. Canter #94000  
Wolpoff & Abramson, L.L.P.  
Attorneys in the Practice of Debt Collection  
4660 Trindle Road, Suite 300  
Camp Hill, PA 17011  
Telephone: (717) 303-6700  
Counsel for Plaintiff

FILED 1cc m+t Bank  
m/11/45 cm, 2cc AAAy.  
DEC 10 2007  
William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

Great Seneca Financial Corp. :  
Assignee of NCOP Capital, Inc. :  
Assignee of Citibank :  
Plaintiff  
v.  
Joyce A. Bertrand  
Defendant

: Civil Action  
: Case No. 07-676-CD

FILED *ICC Atty*  
m/11/30 am NOV 08 2010  
S Pereira

William A. Shaw  
Prothonotary/Clerk of Courts

**WITHDRAWAL OF APPEARANCE**

TO THE PROTHONOTARY OF SAID COURT:

Please withdraw my appearance on behalf of the Plaintiff, Great Seneca Financial Corp. et al.

Respectfully submitted:

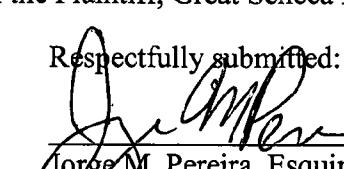
  
Tonilyn Marie Chippie  
WOLPOFF & ABRAMSON, LLP  
4660 Trindle Road, Floor 3  
Camp Hill, PA 17011  
Attorney I.D. #87852  
(717) 303-6700

**ENTRY OF APPEARANCE**

TO THE PROTHONOTARY OF SAID COURT:

Please enter my appearance on behalf of the Plaintiff, Great Seneca Financial Corp. et al.

Respectfully submitted:

  
Jorge M. Pereira, Esquire  
DOUGLAS M. MARINOS & ASSOCIATES, P.C.  
101 North Cedar Crest Boulevard  
Allentown, PA 18104  
Attorney I.D. #75242  
(610) 434-0504