

2007-1081-CD  
Midland Credit et al vs Alicia Forcey

07-1081-CD  
Midland Credit vs Alicia Forcey

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

MIDLAND CREDIT MANAGEMENT, INC.  
AS SERVICER FOR MIDLAND FUNDING LLC  
ASSIGNEE OF BENEFICIAL

Plaintiff

No. 07-1081-CD

VS

CIVIL ACTION - LAW

ALICIA FORCEY

Defendant(s)

PRAECIPE FOR JUDGMENT

Please enter Judgment in favor of Plaintiff and against Defendant(s), ALICIA FORCEY, for want of pursuant to the District Justice Transcript.

(X) Amount due	\$4,046.56
TOTAL	\$4,046.56, 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 Praeclipe 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.

( ) 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: 6/22/02

  
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

NOW, July 11, 2007, JUDGMENT IS ENTERED AS ABOVE.

  
Prothonotary/Clerk, Civil Division

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

**FILED**  
M 11/15/07 20:00  
JUL 11 2007  
William A. Shaw  
Prothonotary/Clerk of Courts  
ICCA Notice to Def.  
Statement to Atty

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: **CLEARFIELD**

4/16/07  
**NOTICE OF JUDGMENT/TRANSCRIPT  
CIVIL CASE**

Mag. Dist. No.:

**46-3-02**

MDJ Name: Hon.

**RICHARD A. IRELAND**  
Address: **650 LEONARD ST  
STE 113  
CLEARFIELD, PA**

Telephone: **(814) 765-5335**      **16830**

PLAINTIFF:

**WOLPOFF & ABRAMSON, LLP**  
**4660 TRINDLE RD**  
**3RD FLOOR**  
**CAMP HILL, PA 17011**

NAME and ADDRESS

DEFENDANT:

**FORCEY, ALICIA**  
**70 KERR AVE**  
**CLEARFIELD, PA 16830**

NAME and ADDRESS

**WOLPOFF & ABRAMSON, LLP**  
**4660 TRINDLE RD**  
**3RD FLOOR**  
**CAMP HILL, PA 17011**

Docket No.: **CV-0000037-07**  
Date Filed: **1/29/07**



**THIS IS TO NOTIFY YOU THAT:**

**DEFAULT JUDGMENT PLTF**

(Date of Judgment) **3/12/07**

<input checked="" type="checkbox"/> Judgment was entered for: (Name) <b>WOLPOFF &amp; ABRAMSON, LLP</b>	Amount of Judgment \$ <b>3,955.06</b>
<input checked="" type="checkbox"/> Judgment was entered against: (Name) <b>FORCEY, ALICIA</b>	Judgment Costs \$ <b>91.50</b>
in the amount of \$ <b>4,046.56</b>	Interest on Judgment \$ <b>.00</b>
<input type="checkbox"/> Defendants are jointly and severally liable.	Attorney Fees \$ <b>.00</b>
<input type="checkbox"/> Damages will be assessed on Date & Time _____	Total \$ <b>4,046.56</b>
<input type="checkbox"/> This case dismissed without prejudice.	Post Judgment Credits \$ _____
<input type="checkbox"/> Amount of Judgment Subject to Attachment/42 Pa.C.S. § 8127 \$ _____	Post Judgment Costs \$ _____
<input type="checkbox"/> Portion of Judgment for physical damages arising out of residential lease \$ _____	Certified Judgment Total \$ _____

ANY PARTY HAS THE RIGHT TO APPEAL WITHIN 30 DAYS AFTER THE ENTRY OF JUDGMENT BY FILING A NOTICE OF APPEAL WITH THE PROTHONOTARY/CLERK OF THE COURT OF COMMON PLEAS, CIVIL DIVISION. YOU MUST INCLUDE A COPY OF THIS NOTICE OF JUDGMENT/TRANSCRIPT FORM WITH YOUR NOTICE OF APPEAL.

EXCEPT AS OTHERWISE PROVIDED IN THE RULES OF CIVIL PROCEDURE FOR MAGISTERIAL DISTRICT JUDGES, IF THE JUDGEMENT HOLDER ELECTS TO ENTER THE JUDGMENT IN THE COURT OF COMMON PLEAS, ALL FURTHER PROCESS MUST COME FROM THE COURT OF COMMON PLEAS AND NO FURTHER PROCESS MAY BE ISSUED BY THE MAGISTERIAL DISTRICT JUDGE.

UNLESS THE JUDGMENT IS ENTERED IN THE COURT OF COMMON PLEAS, ANYONE INTERESTED IN THE JUDGMENT MAY FILE A REQUEST FOR ENTRY OF SATISFACTION WITH THE MAGISTERIAL DISTRICT JUDGE IF THE JUDGMENT DEBTOR PAYS IN FULL, SETTLES, OR OTHERWISE COMPLIES WITH THE JUDGMENT.

169814300

MAR 12 2007 Date Richard Ireland, Magisterial District Judge

I certify that this is a true and correct copy of the record of the proceedings containing the judgment.

MAY 18 2007 Date Richard Ireland, Magisterial District Judge

My commission expires first Monday of January,

**2012**

SEAL

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

MIDLAND CREDIT MANAGEMENT, INC.  
AS SERVICER FOR MIDLAND FUNDING LLC  
ASSIGNEE OF BENEFICIAL  
Plaintiff

No.

VS

CIVIL ACTION - LAW

ALICIA FORCEY  
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, Alicia Forcey, above-named, is over 21 years of age; is last known to reside at 70 Kerrave Ave Clearfield, County of Clearfield, 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: 6/2/07

  
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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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

COMMONWEALTH OF PENNSYLVANIA  
Notarial Seal  
Amy R. Wise, Notary Public  
Hampden Twp., Cumberland County  
My Commission Expires Nov. 30, 2010  
Member, Pennsylvania Association of Notaries

SWORN and SUBSCRIBED to before me this 22<sup>nd</sup> day of JUNE, 2007

  
Amy R. Wise  
Notary Public

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

MIDLAND CREDIT MANAGEMENT, INC.  
AS SERVICER FOR MIDLAND FUNDING LLC  
ASSIGNEE OF BENEFICIAL  
Plaintiff

No.

VS

CIVIL ACTION - LAW

ALICIA FORCEY  
Defendant(s)

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

I hereby certify that the precise address of Plaintiff is:

Midland Credit Management, Inc.  
5775 Roscoe Court  
San Diego CA 92123

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

Alicia Forcey  
70 Kerrave Ave  
Clearfield PA 16830

Date: 6/22/02

  
Amy F. Doyle #87062 / Daniel F. Wolfson #20617  
Philip C. Warholic #86341 / David R. Galloway #87326  
Tonilyn M. Chippie #87852 / Sarah E. Ehasz #86469  
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4660 Trindle Road, Suite 300  
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Telephone: (717) 303-6700  
Counsel for Plaintiff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

MIDLAND CREDIT MANAGEMENT, INC.  
AS SERVICER FOR MIDLAND FUNDING LLC  
ASSIGNEE OF BENEFICIAL

Plaintiff

No. 07-1081-CD

VS

CIVIL ACTION - LAW

ALICIA FORCEY  
Defendant(s)

OPY

NOTICE OF ORDER, DECREE OR JUDGMENT

TO: ALICIA FORCEY  
70 KERRAVE AVE  
  
CLEARFIELD, PA 16830

You are hereby notified that the following ORDER, DECREE or JUDGMENT has been entered against you on  
July 11, 2007 in accordance with the provisions of Pa. R.C.P. 236.

<input type="checkbox"/> Decree Nisi in Equity	<input type="checkbox"/> Confession	<input type="checkbox"/> Verdict
<input type="checkbox"/> Final Decree in Equity	<input type="checkbox"/> Default	<input type="checkbox"/> Non-suit
<input type="checkbox"/> Judgment of	<input type="checkbox"/> Non-pros	<input type="checkbox"/> Arbitration Award

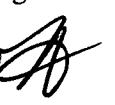
Judgment is in the amount of \$4,046.56, plus costs.  
 District Justice transcript of judgment in civil action in the amount of \$3,346.16, attorney's fees in the amount of \$0.00, interest in the amount of \$608.90, plus costs.  
 If not satisfied within sixty (60) days, your motor vehicle operator's license will be suspended by the Pennsylvania Department of Transportation.

By:

  
Prothonotary

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

Date: 6/22/07



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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Camp Hill, PA 17011  
Telephone: (717) 303-6700  
Counsel for Plaintiff

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

COPY

Midland Credit Management, Inc.  
Midland Funding, LLC  
Beneficial  
Plaintiff(s)

No.: 2007-01081-CD

Real Debt: \$4,046.56

Atty's Comm: \$

Vs. Costs: \$

Int. From: \$

Alicia Forcey  
Defendant(s)

Entry: \$20.00

Instrument: DJ Judgment

Date of Entry: July 11, 2007

Expires: July 11, 2012

Certified from the record this 11th day of July, 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

MIDLAND CREDIT MANAGEMENT, INC.  
AS SERVICER FOR MIDLAND FUNDING LLC  
ASSIGNEE OF BENEFICIAL

Plaintiff

vs.

ALICIA FORCEY

Defendant(s)

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

ml 2:30/ AUG 06 2007

3 court w/6  
William A. Shaw *W/6*  
Prothonotary/Clerk of Courts  
to Shff.

JUDGMENT NO. 07-1081-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 \$4,046.56.

- (1) Directed to the Sheriff of CLEARFIELD County, Pennsylvania;
- (2) against, ALICIA FORCEY located at 70 KERRAVE AVE , CLEARFIELD, PA 16830, Defendant(s)
- (3) and against, CSB BANK located at 900 RIVERS RD , CLEARFIELD, PA 16830-8432, Garnishee(s);
- (4) and index this writ
  - (a) against, ALICIA FORCEY , Defendant(s) and
  - (b) against, CSB BANK, Garnishee(s),

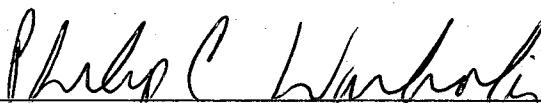
as a lis pendens against the real property of the Defendant(s) in the name of the Garnishee(s) as follows:  
(Specifically describe property) \*\*\*GARNISH ONLY\*\*\*

You are directed to attach the property of the Defendant(s) not levied upon in the possession of  
CSB BANK located at 900 RIVERS RD , CLEARFIELD, PA 16830-8432, 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	\$4,046.56
Interest from 07/11/2007	To Be Determined
At an interest rate of 6% per year	
Total	\$4,046.56 Plus costs & interest

Date: 8/1/07



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  
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

MIDLAND CREDIT MANAGEMENT, INC.  
AS SERVICER FOR MIDLAND FUNDING LLC  
ASSIGNEE OF BENEFICIAL

Plaintiff

No. 07-1081-CD

VS

CIVIL ACTION - LAW

ALICIA FORCEY  
Defendant(s)

INTERROGATORIES TO GARNISHEE IN AID OF EXECUTION

TO: CSB BANK  
900 RIVERS RD  
CLEARFIELD, PA 16830-8432

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) - ALICIA FORCEY

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: 8/1/07

  
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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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**

Midland Credit Management, Inc.,  
Midland Funding, LLC,  
Beneficial,

Vs.

NO.: 2007-01081-CD

Alicia Forcey,

CSB Bank  
Garnishee

**TO THE SHERIFF OF CLEARFIELD COUNTY:**

To satisfy the judgment, interest and costs against MIDLAND CREDIT MANAGEMENT, INC., MIDLAND FUNDING, LLC, BENEFICIAL, Plaintiff(s) from ALICIA FORCEY, , Defendant(s):

- (1) You are directed to levy upon the property of the defendant(s) and to sell defendant's interest(s) therein:
  
- (2) You are also directed to attach the property of the defendant(s) not levied upon in the possession of:  
CSB Bank  
as garnishee(s):  
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: \$4,046.56  
INTEREST FROM: from 07-11-2007, at 6% per year  
ATTY'S COMM: \$  
DATE: 8/6/2007

PROTH. COSTS PAID: \$40.00  
SHERIFF: \$  
OTHER COSTS: \$

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

---

William A. Shaw  
Prothonotary/Clerk Civil Division

Requesting Party: Philip C. Warholic  
4660 Trindle Road, Suite 300  
Camp Hill, PA 17011  
717-303-6700

Sheriff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103075  
NO. 07-1081-CD  
SERVICE # 1 OF 1  
WRIT OF EXECUTION; INTERROGATORIES TO

GARNISHEE

PLAINTIFF: MIDLAND CREDIT MANAGEMENT, INC., MIDLAND FUNDING, LLC, BENEFICIAL,  
vs.

DEFENDANT: ALICAI FORCEY  
TO: CSB BANK, Garnishee

SHERIFF RETURN

---

NOW, August 08, 2007 AT 10:40 AM SERVED THE WITHIN WRIT OF EXECUTION; INTERROGATORIES TO GARNISHEE ON CSB BANK, Garnishee Now: NORTHWEST SAVINGS BANK DEFENDANT AT 900 RIVER RD., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO LAURA MULLIGAN, PERSONAL BANKER A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION; INTERROGATORIES TO GARNISHEE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: HUNTER / DEHAVEN

FILED

08/07/07  
AUG 10 2007

William A. Shaw  
Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	WOLPOFF	211169	10.00
SHERIFF HAWKINS	WOLPOFF	211169	20.00

Sworn to Before Me This

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

So Answers,

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

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

Midland Credit Management, Inc.,  
Midland Funding, LLC,  
Beneficial,

Vs.

NO.: 2007-01081-CD

Alicia Forcey,

CSB Bank  
Garnishee

**TO THE SHERIFF OF CLEARFIELD COUNTY:**

To satisfy the judgment, interest and costs against MIDLAND CREDIT MANAGEMENT, INC., MIDLAND FUNDING, LLC, BENEFICIAL, Plaintiff(s) from ALICIA FORCEY, , Defendant(s):

- (1) You are directed to levy upon the property of the defendant(s) and to sell defendant's interest(s) therein:
  
- (2) You are also directed to attach the property of the defendant(s) not levied upon in the possession of:  
CSB Bank  
as garnishee(s):  
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: \$4,046.56

INTEREST FROM: from 07-11-2007, at 6% per year

ATTY'S COMM: \$

DATE: 8/6/2007

PROTH. COSTS PAID: \$40.00

SHERIFF: \$

OTHER COSTS: \$



William A. Shaw  
Prothonotary/Clerk Civil Division

Received this writ this 6 day  
of Aug A.D. 2007  
At 3:00 A.M./P.M.

Requesting Party: Philip C. Warholic  
4660 Trindle Road, Suite 300  
Camp Hill, PA 17011  
717-303-6700

Philip C. Warholic  
Sheriff Marilyn Hank

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

Midland Credit Management, Inc.,  
Midland Funding, LLC,  
Beneficial,

Vs.

NO.: 2007-01081-CD

Alicia Forcey,

CSB Bank  
Garnishee

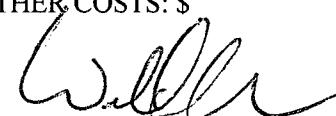
**TO THE SHERIFF OF CLEARFIELD COUNTY:**

To satisfy the judgment, interest and costs against MIDLAND CREDIT MANAGEMENT, INC., MIDLAND FUNDING, LLC, BENEFICIAL, Plaintiff(s) from ALICIA FORCEY, , Defendant(s):

- (1) You are directed to levy upon the property of the defendant(s) and to sell defendant's interest(s) therein:
  
- (2) You are also directed to attach the property of the defendant(s) not levied upon in the possession of:  
CSB Bank  
as garnishee(s):  
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: \$4,046.56  
INTEREST FROM: from 07-11-2007, at 6% per year  
ATTY'S COMM: \$  
DATE: 8/6/2007

PROTH. COSTS PAID: \$40.00  
SHERIFF: \$  
OTHER COSTS: \$



William A. Shaw  
Prothonotary/Clerk Civil Division

Received this writ this 6 day  
of Aug A.D. 2007  
At 3:00 A.M./P.M.  
Chesler A. Hamline  
Sheriff Ray Marley Hamline

Requesting Party: Philip C. Warholic  
4660 Trindle Road, Suite 300  
Camp Hill, PA 17011  
717-303-6700

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

Midland Credit Management, Inc.,  
Midland Funding, LLC,  
Beneficial,

Vs.

NO.: 2007-01081-CD

Alicia Forcey,

CSB Bank  
Garnishee

**FILED**  
m10:30a.m. no  
AUG 20 2007  
(GR)

William A. Shaw  
Prothonotary/Clerk of Courts

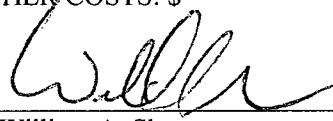
**TO THE SHERIFF OF CLEARFIELD COUNTY:**

To satisfy the judgment, interest and costs against MIDLAND CREDIT MANAGEMENT, INC., MIDLAND FUNDING, LLC, BENEFICIAL, Plaintiff(s) from ALICIA FORCEY, , Defendant(s):

- (1) You are directed to levy upon the property of the defendant(s) and to sell defendant's interest(s) therein:
  
- (2) You are also directed to attach the property of the defendant(s) not levied upon in the possession of:  
CSB Bank  
as garnishee(s):  
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: \$4,046.56  
INTEREST FROM: from 07-11-2007, at 6% per year  
ATTY'S COMM: \$  
DATE: 8/6/2007

PROTH. COSTS PAID: \$40.00  
SHERIFF: \$  
OTHER COSTS: \$



William A. Shaw  
Prothonotary/Clerk Civil Division

Received this writ this 6 day  
of Aug A.D. 2007  
At 3:00 A.M./P.M.

Chuter A. Hawley  
Sheriff Lyman Hark

Requesting Party: Philip C. Warholic  
4660 Trindle Road, Suite 300  
Camp Hill, PA 17011  
717-303-6700

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

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

MIDLAND CREDIT MANAGEMENT, INC.  
AS SERVICER FOR MIDLAND FUNDING LLC  
ASSIGNEE OF BENEFICIAL

Plaintiff

vs.

ALICIA FORCEY

Defendant(s)

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

AUG 06 2007

Attest.

*William C. Warholic*  
Prothonotary/  
Clerk of Courts

JUDGMENT NO. 07-1081-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 \$4,046.56.

- (1) Directed to the Sheriff of CLEARFIELD County, Pennsylvania;
- (2) against, ALICIA FORCEY located at 70 KERRAVE AVE, CLEARFIELD, PA 16830, Defendant(s);
- (3) and against, CSB BANK located at 900 RIVERS RD, CLEARFIELD, PA 16830-8432, Garnishee(s);
- (4) and index this writ
  - (a) against, ALICIA FORCEY, Defendant(s) and
  - (b) against, CSB 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) \*\*\*GARNISH ONLY\*\*\*

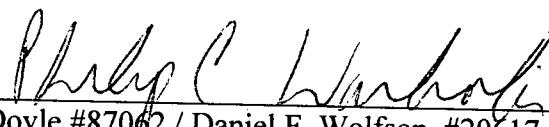
You are directed to attach the property of the Defendant(s) not levied upon in the possession of  
CSB BANK located at 900 RIVERS RD, CLEARFIELD, PA 16830-8432, Garnishee(s).

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	\$4,046.56
Interest from 07/11/2007	To Be Determined
At an interest rate of 6% per year	

Total \$4,046.56 Plus costs & interest

Date: 8/1/07

  
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

MIDLAND CREDIT MANAGEMENT, INC.  
AS SERVICER FOR MIDLAND FUNDING LLC  
ASSIGNEE OF BENEFICIAL

Plaintiff

No. 07-1081-CD

VS

CIVIL ACTION - LAW

ALICIA FORCEY

Defendant(s)

INTERROGATORIES TO GARNISHEE IN AID OF EXECUTION

TO: CSB BANK  
900 RIVERS RD  
CLEARFIELD, PA 16830-8432

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) - ALICIA FORCEY

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. *Yes*

*Checking account - 2866008952 with a balance of 633.30.  
After deducting the \$300.00 exemption and the Northwest  
disclosed processing fee of \$75.00 there is \$258.30  
available for garnishment*

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.

*Yes - 2866008952*

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. *No*

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.

*No*

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? *No*

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.

*No*

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.

No

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.

No

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).

No

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.  
North west charges a disclosed processing fee of \$ 25.00

Date: 8/1/07



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

Midland Credit Management

Plaintiff

vs.

Alicia Forcey

Defendant

v.

NORTHWEST SAVINGS BANK,  
Garnishee

Case No 2007-01081-CD

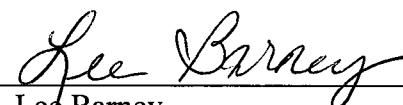
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the within Answers to Interrogatories in Attachment was mailed by first class mail, postage prepaid, or hand delivered this 9th day of August 2007, to unrepresented parties in the above captioned matter as follows:

Alicia Forcey  
70 Kerr Ave  
Clearfield, Pa 16830

Wolpoff & Abramson L.L.P.  
4660 Trindle Rd, Suite 300  
Camp Hill, Pa 17011

By

  
Lee Barney  
Northwest Savings Bank  
100 Liberty St  
PO Box 128  
Warren PA 16365  
(814) 728-7355



# NORTHWEST SAVINGS BANK

Where people make the difference.

100 LIBERTY STREET

P. O. BOX 128

WARREN, PENNSYLVANIA 16365

RE: Midland Credit Management Inc

Vs.

Alicia Forcey  
Commonwealth of Pennsylvania  
County of Clearfield  
Case No 2007-01081-CD

## VERIFICATION

The undersigned does hereby verify under penalty of perjury, that he/she is the legal representative of Northwest Savings Bank, Garnishee herein, that he/she is duly authorized to make this Verification and that the facts set forth in the foregoing INTERROGATORIES are true and correct to the best of his/her knowledge, information and belief.

Please forward all future related documents from the above referenced case number to:

Northwest Savings Bank  
Attn: Lee Barney  
100 Liberty St  
PO Box 128  
Warren PA 16365  
PH: 814-728-7355

Thank you.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

MIDLAND CREDIT MANAGEMENT, INC.  
ASSIGNEE OF BENEFICIAL

Plaintiff

No. 07-1081-CD

VS

CIVIL ACTION - LAW

ALICIA FORCEY  
Defendant(s)

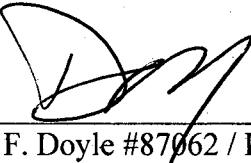
**PRAECIPE TO DISCONTINUE ATTACHMENT EXECUTION**

To the Prothonotary:

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

Respectfully Submitted,

Date: 9/5/07

  
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

FILED  
3/12/2007  
SEP 07 2007  
ICC Atty  
ICC CSB Bank  
William A. Shaw  
Prothonotary/Clerk of Courts  
(60)

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

MIDLAND CREDIT MANAGEMENT, INC.  
ASSIGNEE OF BENEFICIAL

No. 07-1081-CD

Plaintiff

VS

CIVIL ACTION - LAW

ALICIA FORCEY

Defendant(s)

**PRAECIPE TO SETTLE AND SATISFY**

Please mark the judgment in the above-entitled cause as paid and satisfied.

Respectfully Submitted,

By:

Date: 8/23/07

*Amy F. Doyle*  
✓ 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 / [REDACTED]  
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

Cc: ALICIA FORCEY

FILED *1cc'd 1 cert of  
sat to Atty +  
debt*  
m/11:50am  
SEP 13 2007 *2007*  
pd \$7.00 Atty  
William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

MIDLAND CREDIT MANAGEMENT, INC.  
ASSIGNEE OF BENEFICIAL  
Plaintiff

No. 07-1081-CD

vs.

CIVIL ACTION - LAW

ALICIA FORCEY  
Defendant(s)

**CERTIFICATE OF SERVICE**

The undersigned does hereby certify that a copy of the foregoing praecipe was served this date by Regular Mail, Postage Pre-Paid on this 28<sup>th</sup> day of August, 2007.

ALICIA FORCEY  
70 KERR AVE  
CLEARFIELD, PA 16830

Amy R Wise

Amy Wise- Quality Control  
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

CIVIL DIVISION

**CERTIFICATE OF SATISFACTION OF JUDGMENT**

No.: 2007-01081-CD

Midland Credit Management, Inc.  
Midland Funding, LLC  
Beneficial

Debt: \$4046.56

Vs.

Atty's Comm.:

Alicia Forcey

Interest From:

CSB Bank

Cost: \$7.00

NOW, Thursday, September 13, 2007, directions for satisfaction having been received, and all costs having been paid, SATISFACTION was entered of record.

Certified from the record this 13th day of September, A.D. 2007.

  
\_\_\_\_\_  
Prothonotary

lm