

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

CITIBANK (SOUTH DAKOTA) NA

Plaintiff

vs.

MOSES C NORRIS

Defendant

No: 07-1135-CD

COMPLAINT IN CIVIL ACTION

FILED ON BEHALF OF
Plaintiff

COUNSEL OF RECORD OF
THIS PARTY:

James C. Warmbrodt, 42524
WELTMAN, WEINBERG & REIS CO., L.P.A.
436 Seventh Avenue, Suite 2718
Pittsburgh, PA 15219
(412) 434-7955
FAX: 412-338-7130
06029575 C J Pit KXW

FILED ICC Sheriff
JUL 19 2007
William A. Shaw
Prothonotary/Clerk of Courts
Atty pd. 85.00

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

CITIBANK (SOUTH DAKOTA) NA

Plaintiff
vs.

Civil Action No

MOSES C NORRIS

Defendant

COMPLAINT AND 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 an attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

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.

COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
230 EAST MARKET ST., SUITE 228
CLEARFIELD, PA 16830
(814) 765-2641, ext 1300-1301

COMPLAINT

1. Plaintiff is CITIBANK (SOUTH DAKOTA) NA with place of business located at 701 East 50th Street North, Sioux Falls, South Dakota, 57117.

2. Defendant is adult individual(s) residing at the address listed below:

MOSES C NORRIS
913 SHORT CUT RD
IRVONA, PA 16656

3. Plaintiff is a national banking association, engaged in consumer lending through the issuance of credit cards.

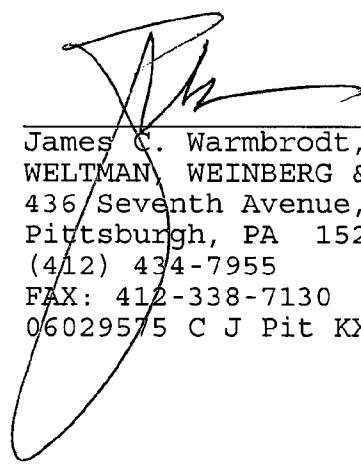
4. Pursuant to Defendant's request, Plaintiff furnished to the Defendant a credit card account (hereinafter account) bearing account number 5424180798359649 .

5. Plaintiff kept accurate running records of all debits and credits to the Account.

6. Plaintiff mailed to Defendant monthly statements for the account including the billing statement attached hereto as Exhibit A. The monthly statements accurately stated the previous balance, the debits and credits to the account for the prior billing period.

7. Defendant's actions as set forth above constituted an account stated between parties for the sum of \$9505.06 , which sum reflects the Exhibit A statement balance less credits, if any, which were applied subsequent to the date of Exhibit A.

Wherefore, the Plaintiff prays for judgment in its favor and against Defendant , MOSES C NORRIS , INDIVIDUALLY , in the amount of \$9505.06 with continuing interest thereon at the rate of 6.000% per annum from date of judgment plus costs.



James C. Warmbrodt, 42524
WELTMAN, WEINBERG & REIS CO., L.P.A.
436 Seventh Avenue, Suite 2718
Pittsburgh, PA 15219
(412) 434-7955
FAX: 412-338-7130
06029575 C J Pit KXW

05/21/07

\$9505.06

\$347.06

SITE:KC-CL

TM:CO-5000

ACID:KCB3104

05/22/07

22:22:36:

CITI CARDS
PO BOX 183068
COLUMBUS, OH
43218-3068

MOSES C NORRIS
ATTNY ACCOUNT-CODE=UCBE
IRVONA
16656-9356000

PA

Citi® Platinum Select® Card



Account Number

5424 1807 9835 9649

Customer Service:

1-800-950-5114

BOX 6500

SIOUX FALLS, SD

57117

Total Credit Line

\$9300

Available Credit Line

\$0

Cash Advance Limit

\$3500

Available Cash Limit

\$0

New Balance

\$9505.06

Statement/
Closing Date

04/26/2007

Amount Over
Credit Line

\$205.06 +

Past Due

\$0.00 +

Purch/Adv
Minimum Due

\$142.00 =

Minimum
Amount Due

\$347.06

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
	4/04	C95SC126	Payments, Credits & Adjustments AGENCY PAYMENT 70 0000 0000	9999 -1,000.00

Your account balance is over the credit line. Please send payment for the Minimum Amount Due shown. If you have already sent us this payment, thank you.

EXHIBIT
A

Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(=) New Balance
PURCHASES	\$9,618.26	\$0.00	\$851.22	\$0.00	\$8,767.04
ADVANCES	\$886.80	\$0.00	\$148.78	\$0.00	\$738.02
TOTAL	\$10,505.06	\$0.00	\$1,000.00	\$0.00	\$9,505.06

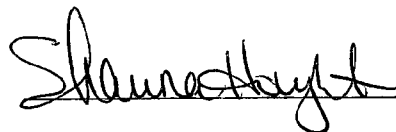
Days This Billing Period: 30

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$0.00	0.08833%(D)	32.240%	32.240%
Offer 4	\$0.00	0.08833%(D)	32.240%	32.240%
Offer 5	\$0.00	0.08833%(D)	32.240%	32.240%
Offer 7	\$0.00	0.08833%(D)	32.240%	32.240%
ADVANCES				
Standard Adv	\$783.07	0.08833%(D)	32.240%	32.240%

Verification

Shauna Houghton

I, _____, am an employee of Citicorp Credit Services, Inc., (USA) which is by contract the service provider for plaintiff CITIBANK (SOUTH DAKOTA) N.A. retained to perform services including but not primarily limited to collecting delinquent debt. I am authorized to make this verification as attorney-in-fact for plaintiff under powers of attorney from plaintiff to Citicorp Credit Services, Inc., (USA) and to me. The foregoing averments of fact in the within pleading are true and correct to the best of my knowledge, information and belief. I understand that the statements made herein are subject to the penalties of 18 Pa. C.S. Section 4904, relating to unsworn falsification to the authorities.

A handwritten signature in cursive script, appearing to read 'Shauna Houghton', written over a horizontal line.

Shauna Houghton

MOSES C NORRIS
5424180798359649
WWR#6029575

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103006
NO: 07-1135-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: CITIBANK (SOUTH DAKOTA) NA
vs.
DEFENDANT: MOSES C. NORRIS

SHERIFF RETURN

FILED
013:00pm
DEC 05 2007
William A. Shaw
Prothonotary/Clerk of Courts

NOW, July 31, 2007 AT 9:35 AM SERVED THE WITHIN COMPLAINT ON MOSES C. NORRIS DEFENDANT AT 913 SHORT CUT RD, IRVONA, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO MELISA RABENSTEIN, ADULT AT RESIDENCE A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

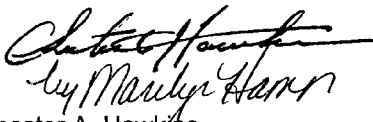
SERVED BY: MORGILLO / DAVIS

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	WELTMAN	2945977	10.00
SHERIFF HAWKINS	WELTMAN	2945977	90.00

Sworn to Before Me This

_____ Day of _____ 2007

So Answers,


Chester A. Hawkins
Sheriff

FILED

APR 10 2008

M/11:30/umg

William A. Shaw
Prothonotary/Clerk of Courts
CENT TO DEPT.

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

w/notice

CITIBANK (SOUTH DAKOTA) NA

Plaintiff

No. 07-1135-CD

vs.

PRAECIPE FOR DEFAULT JUDGMENT

MOSES C NORRIS

Defendant

FILED ON BEHALF OF
Plaintiff

COUNSEL OF RECORD OF
THIS PARTY:

WILLIAM T. MOLCZAN, ESQUIRE
PA I.D.#47437
Weltman, Weinberg & Reis Co., L.P.A.
2718 Koppers Bldg.
436 Seventh Avenue
Pittsburgh, PA 15219
(412) 434-7955

WWR#06029575
Judgment Amount \$ 9505.06

**THIS LAW FIRM IS ATTEMPTING TO COLLECT THIS DEBT FOR ITS CLIENT AND ANY
INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.**

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

CITIBANK (SOUTH DAKOTA) NA

Plaintiff

vs.

Civil Action No. 07-1135-CD

MOSES C NORRIS

Defendant

NOTICE OF JUDGMENT OR ORDER

TO: ☐ Plaintiff
 ☒ Defendant
 ☐ Garnishee

You are hereby notified that the following
Order or Judgment was entered against you
on 4-10-08

(xx) Assumpsit Judgment in the amount
 of \$9505.06 plus costs.

() Trespass Judgment in the amount
 of \$ _____ plus costs.

() If not satisfied within sixty (60)
days, your motor vehicle operator's license and/or registration
will be suspended by the Department of Transportation, Bureau
of Traffic Safety, Harrisburg, PA.

(xx) Entry of Judgment of
 ☐ Court Order
 ☐ Non-Pros
 ☐ Confession
 ☒ Default
 ☐ Verdict
 ☐ Arbitration
 Award

Prothonotary

By: 
PROTHONOTARY (OR DEPUTY)

MOSES C NORRIS
913 SHORT CUT RD
IRVONA, PA 16656

Plaintiff's address is:
c/o Weltman, Weinberg & Reis Co., L.P.A., 2718 Koppers Building, 436 7th Avenue, Pittsburgh, PA 15219
1-888-434-0085

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

CITIBANK (SOUTH DAKOTA) NA

Plaintiff

vs.

Civil Action No. 07-1135-CD

MOSES C NORRIS

Defendant

PRAECIPE FOR DEFAULT JUDGMENT

TO THE PROTHONOTARY:

Kindly enter Judgment against the Defendant, MOSES C NORRIS above named, in the default of an Answer, in the amount of \$9505.06 computed as follows:


Amount claimed in Complaint \$9505.06

Interest from date of judgment
at the legal interest rate of 6% per annum

TOTAL \$9505.06

I hereby certify that appropriate Notices of Default, as attached have been mailed in accordance with PA R.C.P. 237.1 on the dates indicated on the Notices.

WELTMAN, WEINBERG & REIS CO., L.P.A.

By: 
WILLIAM T. MOLCZAN, ESQUIRE
PA I.D.#47437
Weltman, Weinberg & Reis Co., L.P.A.
2718 Koppers Bldg.
436 Seventh Avenue
Pittsburgh, PA 15219
(412) 434-7955

WWR#06029575

Plaintiff's address is:

c/o Weltman, Weinberg & Reis Co., L.P.A., 2718 Koppers Building, 436 7th Avenue, Pittsburgh, PA 15219
And that the last known address of the Defendant is: 913 SHORT CUT ROAD, IRVONA, PA 16656

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

CITIBANK (SOUTH DAKOTA) NA

Plaintiff

Case # 07-1135-CD

MOSES C NORRIS

Defendant(s)

IMPORTANT NOTICE

TO: MOSES C NORRIS
913 SHORT CUT RD
IRVONA, PA 16656

Date of Notice: 03/27/08
WWR#: 06029575

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 PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE FOLLOWING 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.

COURT ADMINSTRATOR
CLEARFIELD COUNTY COURTHOUSE
230 EAST MARKET ST., SUITE 228
CLEARFIELD, PA 16830
(814) 765-2641, ext. 1300-1301

BY: Patrick Thomas Woodman
PATRICK THOMAS WOODMAN
PA I.D. #34507
WELTMAN, WEINBERG & REIS CO., L.P.A.
1400 KOPPERS BLDG, 436 7TH AVE.
PITTSBURGH, PA 15219

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

CITIBANK (SOUTH DAKOTA) NA

Case no: 07-1135-CD

Plaintiff
vs.

NON-MILITARY AFFIDAVIT

MOSES C NORRIS

Defendant

The undersigned, who first being duly sworn, according to law, deposes and states as follows:

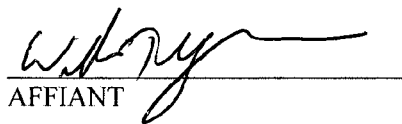
That he/she is the duly authorized agent of the Plaintiff in the within matter.

Affiant further states that the within Affidavit is made pursuant to and in accordance with the Servicemembers' Civil Relief Act (SCRA), 50 U.S.C. App. § 521.

Affiant further states that based upon investigation it is the affiant's belief that the Defendant, MOSES C NORRIS is not in the military service.

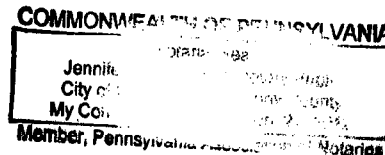
Affiant further states that this belief is supported by the attached certificate from the Defense Manpower Data Center (DMDC), which states that the Defendant, MOSES C NORRIS is not in the military service.

Further Affiant sayeth naught.

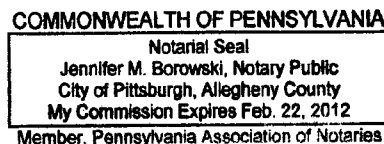

AFFIANT

SWORN TO AND SUBSCRIBED in my presence this 24th day
of March, 2008


NOTARY PUBLIC



This law firm is a debt collector attempting to collect this debt for our client and any information obtained will be used for that purpose.



3/27

Department of Defense Manpower Data Center

APR-04-2008 08:15:53



Military Status Report
Pursuant to the Servicemembers Civil Relief Act

← Last Name	First/Middle	Begin Date	Active Duty Status	Service/Agency
NORRIS	MOSES	Based on the information you have furnished, the DMDC does not possess any information indicating that the individual is currently on active duty.		

Upon searching the information data banks of the Department of Defense Manpower Data Center, based on the information that you provided, the above is the current status of the individual as to all branches of the Military.

Mary M. Snavelly-Dixon

Mary M. Snavelly-Dixon, Director
Department of Defense - Manpower Data Center
1600 Wilson Blvd., Suite 400
Arlington, VA 22209-2593

The Defense Manpower Data Center (DMDC) is an organization of the Department of Defense that maintains the Defense Enrollment and Eligibility Reporting System (DEERS) database which is the official source of data on eligibility for military medical care and other eligibility systems.

The Department of Defense strongly supports the enforcement of the Servicemembers Civil Relief Act [50 USCS Appx. §§ 501 et seq] (SCRA) (formerly the Soldiers' and Sailors' Civil Relief Act of 1940). DMDC has issued hundreds of thousands of "does not possess any information indicating that the individual is currently on active duty" responses, and has experienced a small error rate. In the event the individual referenced above, or any family member, friend, or representative asserts in any manner that the individual is on active duty, or is otherwise entitled to the protections of the SCRA, you are strongly encouraged to obtain further verification of the person's active duty status by contacting that person's Military Service via the "defenselink.mil" URL provided below. If you have evidence the person is on active-duty and you fail to obtain this additional Military Service verification, provisions of the SCRA may be invoked against you.

If you obtain further information about the person (e.g., an SSN, improved accuracy of DOB, a middle name), you can submit your request again at this Web site and we will provide a new certificate for that query.

This response reflects current active duty status only. For historical information, please contact the Military Service SCRA points-of-contact.

See: <http://www.defenselink.mil/faq/pis/PC09SLDR.html>

WARNING: This certificate was provided based on a name and Social Security number (SSN) provided

by the requester. Providing an erroneous name or SSN will cause an erroneous certificate to be provided.

Report ID: BQQHLJDNGAV

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

CITIBANK (SOUTH DAKOTA) NA

Plaintiff

No. 07-1135-CD

vs.

**PRAECIPE FOR WRIT OF EXECUTION
(BANK ATTACHMENT and LEVY)**

MOSES C NORRIS

Defendant

NORTHWEST SAVINGS BANK,

Garnishee,

FILED ON BEHALF OF
Plaintiff

COUNSEL OF RECORD OF
THIS PARTY:

William T. Molczan, Esquire
PA I.D. #47437
WELTMAN, WEINBERG & REIS CO., L.P.A.
1400 Koppers Building
436 Seventh Avenue
Pittsburgh, PA 15219
(412) 434-7955

WWR#6029575

FILED *Att. pd.*
7/12:54/84
MAY 07 2008 *0.20.00*
3cc @ Lewin's
William A. Shaw *to Sheriff*
Prothonotary/Clerk of Courts
GP

COPY

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

CITIBANK (SOUTH DAKOTA) NA
Plaintiff

vs.

Civil Action No. 07-1135-CD

MOSES C NORRIS
Defendant

NORTHWEST SAVINGS BANK
Garnishee

WRIT OF EXECUTION

TO THE SHERIFF OF CLEARFIELD COUNTY:

To satisfy the judgment, interest and costs against: MOSES C NORRIS Defendant(s);

- (1) You are directed to levy upon the property of the defendant(s) and to sell his/her/their interest therein;
- (2) You are also directed to attach the property of the defendant not levied upon in the possession of NORTHWEST SAVINGS BANK, as garnishee, 1200 S 2ND ST CLEARFIELD PA 16830 and to notify the garnishee that:
 - a. An attachment has been 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
 - 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 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] such other person that he or she has been added as a garnishee and is enjoined as above sated

Amount due\$ 9719.43

Costs to be added..... \$ 125.00

Prothonotary costs

Prothonotary


5/7/08

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.

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

CITIBANK (SOUTH DAKOTA) NA

Plaintiff

vs.

MOSES C NORRIS

Defendant

NORTHWEST SAVINGS BANK,

Garnishee,

No. 07-1135-CD

**PRAECIPE FOR WRIT OF EXECUTION
(BANK ATTACHMENT and LEVY)**

FILED ON BEHALF OF
Plaintiff

COUNSEL OF RECORD OF
THIS PARTY:

William T. Molczan, Esquire
PA I.D. #47437
WELTMAN, WEINBERG & REIS CO., L.P.A.
1400 Koppers Building
436 Seventh Avenue
Pittsburgh, PA 15219
(412) 434-7955

WWR#6029575

FILED *Atty pd.*
m/b: 5439
MAY 07 2008 *20.00*
3cc @ Lewis
to Sheriff
William A. Shaw
Prothonotary/Clerk of Courts
@

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

CITIBANK (SOUTH DAKOTA) NA

Plaintiff

vs.

Civil Action No. 07-1135-CD

MOSES C NORRIS

Defendant

NORTHWEST SAVINGS BANK,

Garnishee

PRAECIPE FOR WRIT OF EXECUTION

TO THE PROTHONOTARY:

Kindly issue a Writ of Execution in the above matter...

1. directed to the Sheriff of CLEARFIELD County:
2. against MOSES C NORRIS, Defendant
3. against NORTHWEST SAVINGS BANK, Garnishee

4. Judgment Amount	\$	9505.06
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Interest	\$	9.37
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Costs	\$	205.00
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SUBTOTAL:	\$	9719.43
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Costs (to be added by Prothonotary):	Prothonotary costs	\$ <u>125.00</u>
--------------------------------------	---------------------------	------------------

WELTMAN, WEINBERG & REIS CO., L.P.A.

By: 

William T. Molczan, Esquire

PA I.D. #47437

WELTMAN, WEINBERG & REIS CO., L.P.A.

1400 Koppers Building

436 Seventh Avenue

Pittsburgh, PA 15219

(412) 434-7955

WWR#6029575

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

CITIBANK (SOUTH DAKOTA) NA
Plaintiff

No. 07-1135-CD

vs.

MOSES C NORRIS

Defendant
NORTHWEST SAVINGS BANK
Garnishee

WRIT OF EXECUTION
NOTICE

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

The law provides that certain property cannot be taken and sold by the Sheriff to satisfy your debts. SUCH PROPERTY IS SAID TO BE EXEMPT. No matter what you may owe, there is a DEBTOR'S EXEMPTION established by law. This means that no matter what happens, the Sheriff must give you from the sale at least \$300.00 in cash or property. There are also other exemptions which may be applicable to you. Listed below 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) Complete the claim form on the opposite side and demand a prompt hearing.
- (2) Deliver the form or mail it to the Sheriff's Office at the address noted.

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

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

LAWYER REFERRAL SERVICE
PENNSYLVANIA BAR ASSOCIATION
P.O. BOX 186
HARRISBURG, PA 17108
TELEPHONE NO.: 1-800-692-7375

MAJOR EXEMPTIONS UNDER PENNSYLVANIA AND FEDERAL LAW

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

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 statutory \$300.00 exemption be:
() (1) set aside in kind (specify property, to be set aside in kind: _____

() (2) paid in cash following the sale of the property levied upon; or
- (b) I claim the following exemption: (specify property and basis of exemption): _____

- (2) FROM MY PROPERTY WHICH IS IN THE POSSESSION OF A THIRD PARTY, I CLAIM THE FOLLOWING EXEMPTIONS:
- (a) my \$300.00 statutory exemption: () in cash () in kind
(specify property): _____

- (b) Social Security benefits on deposit in the amount of \$ _____
- (c) Other (specify amount & basis for exemption): _____

I request a prompt court hearing to determine the exemption.

Notice of hearing should be given me at the following:

ADDRESS: _____ TELEPHONE NUMBER: _____

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

Date: _____ Defendant: _____

THIS CLAIM TO BE FILED WITH:

Office of the Sheriff of Clearfield County
1 N. Second Street, Suite 116, Clearfield County Courthouse
Clearfield, Pennsylvania 16830
Telephone Number: (814) 765-2641 ext. 5986

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

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

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

FILED

JUN 11 2008

William A. Shaw
Prothonotary/Clerk of Courts

WWR#6029575

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

CITIBANK (SOUTH DAKOTA) NA

Plaintiff

No. 07-1135-CD

vs.

INTERROGATORIES IN ATTACHMENT
NORTHWEST SAVINGS BANK

MOSES C NORRIS

Defendant

and

NORTHWEST SAVINGS BANK

Garnishee

FILED ON BEHALF OF:
Plaintiff

COUNSEL OF RECORD OF
THIS PARTY:

William T. Molczan, Esquire
PA I.D. #47437
WELTMAN, WEINBERG & REIS CO., L.P.A.
1400 Koppers Building
436 Seventh Avenue
Pittsburgh, PA 15219
(412) 434-7955
WWR#6029575

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

CITIBANK (SOUTH DAKOTA) NA

Plaintiff

vs.

Civil Action No.: 07-1135-CD

MOSES C NORRIS

Defendant

and

NORTHWEST SAVINGS BANK

Garnishee

TO: NORTHWEST SAVINGS BANK
1200 S 2ND ST
CLEARFIELD PA 16830

Suggested Reference No.: XXX-XX-5660

RE: MOSES C NORRIS
913 SHORT CUT RD
IRVONA PA 16656

IMPORTANT NOTICES 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. Herein, the word "defendant" means any one or more of the defendants against whom the writ of Execution is issued.

C. While service of Writ upon the Garnishee attaches all property of the Defendant subject to attachment which is then in the hands of the garnishee, it also attaches all property of the defendant which comes into the Garnishee's possession thereafter, until Judgment is entered against the Garnishee. For example, the resultant liability of a Garnishee-Bank would not be measured by the balance in the debtor's account, either at the time of service of the Writ or at the time of Judgment against the Garnishee, but rather by the amounts deposited and withdrawn during the intervening period.

VERIFICATION

The undersigned does hereby verify subject to the penalties of 18 PA. C.S. 4904 relating to unsworn falsifications to authorities, that he/she is LEE BARNEY
(Name)

agent of NORTHWEST Savings Bank, garnishee herein,
(Title) (Company)

that he/she is duly authorized to make this verification, and that the facts set forth in the foregoing

Answers to Interrogatories are true and correct to the best of his/her knowledge, information and belief.

Lee Barney
(SIGNATURE)

**NORTHWEST SAVINGS BANK
P O BOX 128
WARREN, PA 16365**



NORTHWEST SAVINGS BANK

Where people make the difference.

100 LIBERTY STREET

P. O. BOX 128

WARREN, PENNSYLVANIA 16365

RE: Citibank (South Dakota)

Vs.

Moses C Norris

Commonwealth of Pennsylvania

County of Clearfield

Case No 07-1135-D

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.

Lee Barney
6-06-08

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

Citibank (South Dakota)
Plaintiff

vs.

Moses C Norris

Defendant

v.

NORTHWEST SAVINGS BANK,
Garnishee

Case No 07-1135-D

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 6th day of June 2008, to unrepresented parties in the above captioned matter as follows:

Moses C Norris
913 Short Cut Rd
Irvona, Pa 16656-9356

Weltman Weinberg & Reis Co LPA
1400 Koppers Building
436 Seventh Ave
Pittsburgh, Pa 15219

By Lee Barney 6-6-08
Lee Barney
Northwest Savings Bank
100 Liberty St
PO Box 128
Warren PA 16365
(814) 728-7355

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

CITIBANK (SOUTH DAKOTA) NA

Plaintiff

No. 07-1135-CD

vs.

**PRAECIPE TO SETTLE, DISCONTINUE
& END AS TO THE GARNISHEE
NORTHWEST SAVINGS BANK ONLY**

MOSES C NORRIS

Defendant

NORTHWEST SAVINGS BANK

Garnishee

FILED ON BEHALF OF
Plaintiff

COUNSEL OF RECORD OF
THIS PARTY:

James C. Warmbrodt
PA I.D. #42524
WELTMAN, WEINBERG & REIS CO., L.P.A.
1400 Koppers Building
436 Seventh Avenue
Pittsburgh, PA 15219
(412) 434-7955

WWR#6029575

FILED acc Atty
m/ 11:55 am Warmbrodt
JUL 11 2008 po \$7.00 Atty
(UN)
William A. Shaw
Prothonotary/Clerk of Courts

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

CITIBANK (SOUTH DAKOTA) NA

Plaintiff

vs.

Civil Action No. 07-1135-CD

MOSES C NORRIS

Defendant

NORTHWEST SAVINGS BANK

Garnishee

PRAECIPE TO SETTLE DISCONTINUE AND END
AS TO THE GARNISHEE , NORTHWEST SAVINGS BANK, ONLY

TO THE PROTHONOTARY OF COUNTY:

Please kindly Settle Discontinue and End the above captioned matter as to Garnishee, NORTHWEST SAVINGS BANK, only, upon the records of the Court and mark the cost paid.

WELTMAN, WEINBERG & REIS CO., L.P.A.

By: 

James C. Warmbrodt

PA I.D #42524

WELTMAN, WEINBERG & REIS CO., L.P.A.

1400 Koppers Building

436 Seventh Avenue

Pittsburgh, PA 15219

(412) 434-7955

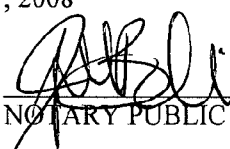
WWR#6029575

Sworn to and subscribed

Before me the 27

Day of JUNE

, 2008


NOTARY PUBLIC

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal

Jennifer M. Borowski, Notary Public
City of Pittsburgh, Allegheny County
My Commission Expires Feb. 22, 2012

Member, Pennsylvania Association of Notaries

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20777
NO: 07-1135-CD

PLAINTIFF: CITIBANK (SOUTH DAKOTA) NA
vs.
DEFENDANT: MOSES C. NORRIS

Execution PERSONAL PROPERTY / INTERROGATORIES

SHERIFF RETURN

DATE RECEIVED WRIT: 5/7/2008

LEVY TAKEN 6/3/2008 @ 2:32 PM

POSTED 6/18/2008 @ 10:01 AM

SALE HELD

SOLD TO

SOLD FOR AMOUNT PLUS COSTS

WRIT RETURNED 2/12/2012

DATE DEED FILED

PROPERTY ADDRESS 913 SHORT CUT ROAD IRVONA , PA 16656

5 FILED
013:31/01
FEB 02 2012
William A. Shaw
Prothonotary/Clerk of Courts

SERVICES

SEE ATTACHED SHEET(S) OF SERVICES

SHERIFF HAWKINS \$144.22

SURCHARGE \$30.00 PAID BY ATTORNEY

Sworn to Before Me This

So Answers,

_____ Day of _____ 2012

Chester A. Hawkins
Jay Cynthia Butler - Cephallus
Chester A. Hawkins
Sheriff

CITIBANK (SOUTH DAKOTA) NA

vs
MOSES C. NORRIS

1 6/3/2008 @ 2:32 PM SERVED MOSES C. NORRIS

SERVED MOSES C. NORRIS, DEFENDANT, AT HIS RESIDENCE 913 SHORT CUT ROAD, IRVONA, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO MOSES C. NORRIS

A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION, NOTICE OF SALE, AND COPY OF THE LEVY AND BY MAKING KNOW TO HIM / HER THE CONTENTS THEREOF.

2 5/30/2008 @ 9:10 AM SERVED NORTHWEST SAVINGS BANK

SERVED NORTHWEST SAVINGS BANK, GARNISHEE, BY HANDING TO ANNETTE LUMADUE, ASSISTANT MANAGER OF NORTHWEST SAVINGS BANK AT HER PLACE OF EMPLOYMENT, NORTHWEST SAVINGS BANK, 1200 S. SECOND

A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION AND INTERROGATORIES TO GARNISHEE.

3 6/18/2008 @ 10:01 AM SERVED MOSES C. NORRIS

SERVED MOSES C. NORRIS, DEFENDANT, AT HIS RESIDENCE 913 SHORT CUT ROAD, IRVONA, CLEARFIELD COUNTY, PENNSYLVANIA

A NOTICE OF SALE AND MADE KNOWN TO HIM THE CONTENTS THEREOF.

@ SERVED

NOW, AUGUST 4, 2008 RECEIVED A FAX LETTER FROM THE PLAINTIFF'S ATTORNEY TO GENERALLY CONTINUE THE SHERIFF SALE SCHEDULED FOR AUGUST 8, 2008 UNTIL FURTHER NOTICE FROM ATTY OFFICE.

@ SERVED

NOW, FEBRUARY 2, 2012 RETURN WRIT AS TIME EXPIRED.

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

CITIBANK (SOUTH DAKOTA) NA
Plaintiff

vs.

Civil Action No. 07-1135-CD

MOSES C NORRIS
Defendant

NORTHWEST SAVINGS BANK
Garnishee

WRIT OF EXECUTION

TO THE SHERIFF OF CLEARFIELD COUNTY:

To satisfy the judgment, interest and costs against: MOSES C NORRIS Defendant(s);

Received this writ this 7th day
of May A.D. 2008
At 3:00 A.M./P.M.

Charles A. Hunsicker
Sheriff of Clearfield County

- (1) You are directed to levy upon the property of the defendant(s) and to sell his/her/their interest therein;
(2) You are also directed to attach the property of the defendant not levied upon in the possession of NORTHWEST SAVINGS BANK, as garnishee, 1200 S 2ND ST CLEARFIELD PA 16830 and to notify the garnishee that:
- a. An attachment has been 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
 - 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 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] such other person that he or she has been added as a garnishee and is enjoined as above sated

Amount due\$ 9719.43

Costs to be added..... \$ 125.00

Prothonotary costs

Prothonotary

William L. Hunsicker
BSA 5/7/08

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.

**PERSONAL PROPERTY SALE
SCHEDULE OF DISTRIBUTION**

NAME MOSES C. NORRIS

NO. 07-1135-CD

NOW, February 02, 2012, 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 Moses C. Norris 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
SERVICE	9.00
MILEAGE	27.27
LEVY	20.00
MILEAGE	27.27
POSTING	9.00
HANDBILLS	
COMMISSION	0.00
POSTAGE	1.68
HANDBILLS	10.00
DISTRIBUTION	
ADVERTISING	
ADD'L SERVICE	9.00
ADD'L POSTING	
ADD'L MILEAGE	2.00
ADD'L LEVY	
BID/ SETTLEMENT AMOUNT	
RETURNS/DEPUTIZE	
COPIES	15.00
BILLING/PHONE/FAX	5.00
CONTINUED SALES	
MISCELLANEOUS	
TOTAL SHERIFF COSTS	\$144.22

DEBT-AMOUNT DUE	9,505.06
INTEREST @ %	0.00
FROM TO	
PROTH SATISFACTION	
LATE CHARGES AND FEES	
COST OF SUIT-TO BE ADDED	205.00
FORECLOSURE FEES	
ATTORNEY COMMISSION	
REFUND OF ADVANCE	
REFUND OF SURCHARGE	30.00
SATISFACTION FEE	
ESCROW DEFICIENCY	
PROPERTY INSPECTIONS	
INTEREST	9.73
MISCELLANEOUS	
TOTAL DEBT AND INTEREST	\$10,019.01

COSTS:

ADVERTISING	0.00
TAXES - COLLECTOR	
TAXES - TAX CLAIM	
DUE	
LIEN SEARCH	
ACKNOWLEDGEMENT	

SHERIFF COSTS	144.22
LEGAL JOURNAL COSTS	0.00
PROTHONOTARY	125.00
MORTGAGE SEARCH	
MUNICIPAL LIEN	

TOTAL COSTS **\$269.22**

TOTAL COSTS **\$10,019.01**

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

WELTMAN, WEINBERG & REIS CO., L.P.A.

ATTORNEYS AT LAW
2718 Koppers Bldg., 436 7th Ave.
Pittsburgh, PA 15219
Main Phone: 412 434-7955
Fax Number: 412 434-7959
www.weltman.com

Fax Transmittal

Date: 8/4/08 No. of Pages: 1
To: Clearfield County Sheriff Fax Number: 814-765-5915
From: Jen Borowski Direct Line: 412-434-7955

Comments

RE: Citibank (South Dakota) NA vs. Moses C Norris Docket No.: 07-1135 CD Our File No.: 6029575

Please GENERALLY CONTINUE the sheriffs sale scheduled for 8/8/08 on the above matter until further notice from our office. If you should have any questions or concerns please contact me. Thanks.



Cincinnati, OH • Cleveland, OH • Columbus, OH • Detroit, MI • Mount Holly, NJ • Philadelphia, PA

CONFIDENTIALITY NOTICE

The documents accompanying this telecopy transmission contain confidential information belonging to the sender which is legally privileged. This information is intended only for the use of the individual or entity named above. If you are not the intended recipient, you are hereby notified that disclosure, copying, distribution or the taking of any action in reliance on the contents of this telecopied information is strictly prohibited. If you have received this telecopy in error, please immediately notify us by telephone to arrange for return of the original documents to us.

TOTAL P.01