

07-1605-CD
Target National Bank vs Rose Cockrell

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

TARGET NATIONAL BANK
T/A TARGET VISA
FKA RETAILERS NATIONAL BANK
Plaintiff

VS

ROSE M COCKRELL
Defendant(s)

No. 2007-1605-C0

FILED

OCT 01 2007
RE 12:30 AM
William A. Shaw
Prothonotary/Clerk of Courts
I Cans u/w/one
To Party & Defer

PRAECEIPE FOR JUDGMENT

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

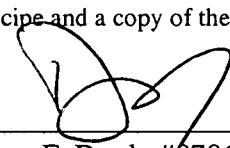
(X)	Amount due	\$2,939.78
	TOTAL	\$2,939.78, plus interest and costs

(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 Praeceipe 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.

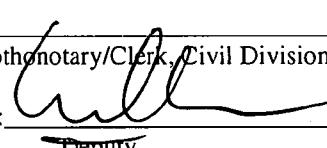
() Pursuant to Pa.R.C.P. 237.1, I certify that written notice of the intention to file this praecipe was mailed or delivered to the party against whom judgment is to be entered and to his/her Attorney of Record, if any, after the default occurred and at least ten days prior to the date of the filing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

Date: 9/25/07


Amy F. Doyle #87062 / Daniel F. Wolfson #20617
Philip C. Wahrholic #86341 / David R. Galloway #87326
Tonilyn M. Chippie #87852 / Sarah E. Ehasz #86469
Robert N. Polas, Jr. #201259
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, OCT. 1, 2007, JUDGMENT IS ENTERED AS ABOVE.

Prothonotary/Clerk, Civil Division

By: 

Deputy

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

TARGET NATIONAL BANK
T/A TARGET VISA
FKA RETAILERS NATIONAL BANK
Plaintiff

No.

VS

CIVIL ACTION - LAW

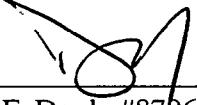
ROSE M COCKRELL
Defendant(s)

AFFIDAVIT OF NON-MILITARY SERVICE

COMMONWEALTH OF PENNSYLVANIA :
: :
COUNTY OF CLEARFIELD :

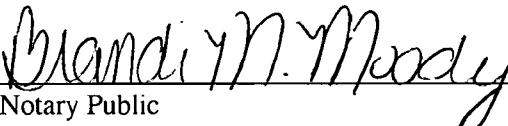
The undersigned counsel, being duly sworn according to law, depose and say that I am the Attorney for the Plaintiff in the above-captioned matter, and that to the best of my knowledge, information and belief Defendant, Rose M Cockrell, above-named, is over 21 years of age; is last known to reside at 2689 Carson Hill Rd Du Bois, 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: 9/25/07


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 [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

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

SWORN and SUBSCRIBED to before me this 25th day of September, 2007.


Brandi M. Moody
Notary Public

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: **CLEARFIELD**

Mag. Dist. No.:

46-3-01

MDJ Name: Hon.

PATRICK N. FORD
Address: **309 MAPLE AVENUE**
PO BOX 452
DUBOIS, PA

Telephone: **(814) 371-5321** **15801**

1/22/07
**NOTICE OF JUDGMENT/TRANSCRIPT
CIVIL CASE**

PLAINTIFF:

TARGET NATIONAL BANK
4660 TRINDLE ROAD
C/O WOLPOFF & ABRAMSON
CAMP HILL, PA 17011

NAME and ADDRESS

DEFENDANT:

COCKRELL, ROSE M
2689 CARSON HILL ROAD
DUBOIS, PA 15801

NAME and ADDRESS

TARGET NATIONAL BANK
4660 TRINDLE ROAD
C/O WOLPOFF & ABRAMSON
CAMP HILL, PA 17011

Docket No.: **CV-0000556-06**
Date Filed: **11/17/06**



THIS IS TO NOTIFY YOU THAT:

Judgment: **DEFAULT JUDGMENT PLTF** (Date of Judgment) **12/18/06**

<input checked="" type="checkbox"/> Judgment was entered for: (Name) TARGET NATIONAL BANK	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;">Amount of Judgment</td> <td style="width: 40%;">\$ 2,850.78</td> </tr> <tr> <td>Judgment Costs</td> <td>\$ 89.00</td> </tr> <tr> <td>Interest on Judgment</td> <td>\$.00</td> </tr> <tr> <td>Attorney Fees</td> <td>\$.00</td> </tr> <tr> <td>Total</td> <td>\$ 2,939.78</td> </tr> <tr> <td>Post Judgment Credits</td> <td>\$ _____</td> </tr> <tr> <td>Post Judgment Costs</td> <td>\$ _____</td> </tr> <tr> <td colspan="2" style="text-align: right;">Certified Judgment Total \$ _____</td> </tr> </table>	Amount of Judgment	\$ 2,850.78	Judgment Costs	\$ 89.00	Interest on Judgment	\$.00	Attorney Fees	\$.00	Total	\$ 2,939.78	Post Judgment Credits	\$ _____	Post Judgment Costs	\$ _____	Certified Judgment Total \$ _____	
Amount of Judgment		\$ 2,850.78															
Judgment Costs	\$ 89.00																
Interest on Judgment	\$.00																
Attorney Fees	\$.00																
Total	\$ 2,939.78																
Post Judgment Credits	\$ _____																
Post Judgment Costs	\$ _____																
Certified Judgment Total \$ _____																	
<input checked="" type="checkbox"/> Judgment was entered against: (Name) COCKRELL, ROSE M in the amount of \$ 2,939.78																	
<input type="checkbox"/> Defendants are jointly and severally liable.	Amount of Judgment																
<input type="checkbox"/> Damages will be assessed on Date & Time _____	Judgment Costs																
<input type="checkbox"/> This case dismissed without prejudice.	Interest on Judgment																
<input type="checkbox"/> Amount of Judgment Subject to Attachment/42 Pa.C.S. § 8127 \$ _____	Attorney Fees																
<input type="checkbox"/> Portion of Judgment for physical damages arising out of residential lease \$ _____	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.

168 882 001

12/18/06 Date *Patrick N. Ford PNF*, Magisterial District Judge

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

3/5/07 Date *Patrick N. Ford*, Magisterial District Judge

My commission expires first Monday of January, **2012**

SEAL

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

TARGET NATIONAL BANK
T/A TARGET VISA
FKA RETAILERS NATIONAL BANK
Plaintiff

No.

VS

CIVIL ACTION - LAW

ROSE M COCKRELL
Defendant(s)

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

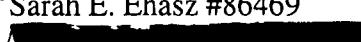
I hereby certify that the precise address of Plaintiff is:

Target National Bank
3701 Wayzata Blvd
Mailstop 3C-G
Minneapolis MN 54416

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

Rose M Cockrell
2689 Carson Hill Rd
Du Bois PA 15801

Date: 9/25/02


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 / 
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

TARGET NATIONAL BANK
FKA RETAILERS NATIONAL BANK
Plaintiff

No.

VS

CIVIL ACTION - LAW

ROSE M COCKRELL
Defendant(s)

NOTICE OF ORDER, DECREE OR JUDGMENT

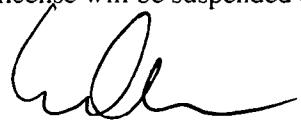
TO: ROSE M COCKRELL
2689 CARSON HILL RD

DU BOIS, PA 15801

You are hereby notified that the following ORDER, DECREE or JUDGMENT has been entered against you on
Oct. 1, 2007 in accordance with the provisions of Pa. R.C.P. 236.

() Decree Nisi in Equity
() Final Decree in Equity
() Judgment of () Confession () Verdict
() Default () Non-suit
() Non-pros () Arbitration Award
(X) Judgment is in the amount of \$2,939.78, plus costs.
(X) District Justice transcript of judgment in civil action in the amount of \$2,850.78, attorney's fees in the amount of \$0.00, interest in the amount of \$0.00, 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: 9/25/17


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

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK
FKA RETAILERS NATIONAL BANK
Plaintiff

: No.

VS

: CIVIL ACTION - LAW

ROSE M COCKRELL
Defendant(s)

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the was
served upon the individual(s) listed below by Regular Mail, Postage Pre-Paid on this 25
day of September, 2007.

ROSE M COCKRELL
2689 CARSON HILL RD
DU BOIS, PA 15801



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 / 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

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

TARGET NATIONAL BANK
T/A TARGET VISA
FKA RETAILERS NATIONAL BANK
Plaintiff

vs.

ROSE M COCKRELL

Defendant(s)

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

JUDGMENT NO. 2007-1605-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 \$2,939.78.

(1) Directed to the Sheriff of CLEARFIELD County, Pennsylvania;
(2) against, ROSE M COCKRELL located at 2689 CARSON HILL RD , DU BOIS, PA 15801, Defendant(s)
(3) and against, NATIONAL CITY BANK located at 200 N BRADY ST , DU BOIS, PA 15801, Garnishee(s);
(4) and index this writ
(a) against, ROSE M COCKRELL , Defendant(s) and
(b) against, NATIONAL CITY 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
NATIONAL CITY BANK located at 200 N BRADY ST , DU BOIS, PA 15801, Garnishee(s).

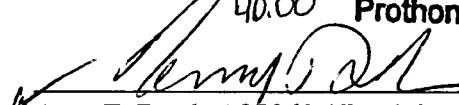
All accounts including but not limited to all savings, checking and other accounts, certificates of deposit, notes
receivables, collateral, pledges, documents of title, securities, coupons and safe deposit boxes.

Amount due \$2,939.78
Interest from 10/01/2007 To Be Determined
At an interest rate of 6% per year

Total \$2,939.78 Plus costs & interest

40.00 Prothonotary costs

Date: 10/29/07


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 / 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
M 12/15/07 20:00
NOV 01 2007
4CC & Lewintz
William A. Shaw to Sheriff
Prothonotary/Clerk of Courts
GK

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

TARGET NATIONAL BANK
T/A TARGET VISA
FKA RETAILERS NATIONAL BANK
Plaintiff

No. 2007-1605-CD

VS

CIVIL ACTION - LAW

ROSE M COCKRELL
Defendant(s)

INTERROGATORIES TO GARNISHEE

TO: NATIONAL CITY BANK
200 N BRADY ST
DU BOIS, PA 15801

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.

**INTERROGATORIES TO GARNISHEE
DEFENDANT(S) - ROSE M COCKRELL**

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.

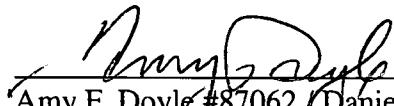
6. REAL OR PERSONAL PROPERTY: At the time you were served or at any subsequent time, state whether or not Defendant(s) owns any personal property that was in your possession and/or control. If so, include a full description of all personal property giving full value and present location. State also whether 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: 10/29/07



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 / 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

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

Target National Bank, T/A Target Visa
f/k/a Retailers National Bank

Vs.

NO.: 2007-01605-CD

copy

Rose M. Cockrell

National City Bank
Garnishee

TO THE SHERIFF OF CLEARFIELD COUNTY:

To satisfy the judgment, interest and costs against TARGET NATIONAL BANK, T/A Target Visa, f/k/a Retailers National Bank, Plaintiff(s) from ROSE M. COCKRELL, Defendant(s):

(1) You are directed to levy upon the property of the defendant(s) and to sell defendant's interest(s) therein:
Personal Property

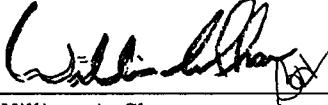
You are also directed to attach the property of the defendant(s) not levied upon in the possession of National City Bank as garnishee(s): ALL ACCOUNTS INCLUDING BUT NOT LIMITED TO ALL SAVINGS, CHECKING AND OTHER ACCOUNTS, CERTIFICATES OF DEPOSIT, NOTES RECEIVABLES, COLLATERAL, PLEDGES, DOCUMENTS OF TITLE, 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.

(2) 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.

(3) **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: \$2,939.78
INTEREST FROM 10/01/2007: To Be Determined
ATTY'S COMM: \$
DATE: 11/01/2007

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



William A. Shaw

Prothonotary/Clerk Civil Division

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

Requesting Party: Amy F. Doyle, Esq.
4660 Trindle Road, Ste. 300
Camp Hill, PA 17011
(717) 303-6700

Sheriff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103379
NO: 07-1605-CD
SERVICE # 1 OF 1
WRIT OF EXECUTION; INTERROGATORIES TO

GARNISHEE

PLAINTIFF: TARGET NATIONAL BANK, T/A Target Visa f/k/a

vs.

DEFENDANT: ROSE M. COCKRELL
TO: NATIONAL CITY BANK, Garnishee

SHERIFF RETURN

NOW, November 02, 2007 AT 10:55 AM SERVED THE WITHIN WRIT OF EXECUTION; INTERROGATORIES TO GARNISHEE ON NATIONAL CITY BANK, Garnishee DEFENDANT AT (WORK) 200 N. BRADY ST., DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO PAM FARRELL, MANAGER A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION; INTERROGATORIES TO GARNISHEE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: COUDRIET / NEVLING

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	WOLPOFF	233931	10.00
SHERIFF HAWKINS	WOLPOFF	233931	36.84

FILED No cc.
0/2:40pm
NOV - 7 2007
CS

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

____ Day of 2007

So Answers,

*Chester A. Hawkins
by Marlynn Hanna*
Chester A. Hawkins
Sheriff

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

Target National Bank, T/A Target Visa
f/k/a Retailers National Bank

Vs.

NO.: 2007-01605-CD

Rose M. Cockrell

National City Bank
Garnishee

TO THE SHERIFF OF CLEARFIELD COUNTY:

To satisfy the judgment, interest and costs against TARGET NATIONAL BANK, T/A Target Visa, f/k/a Retailers National Bank, Plaintiff(s) from ROSE M. COCKRELL, Defendant(s):

(1) You are directed to levy upon the property of the defendant(s) and to sell defendant's interest(s) therein:
Personal Property

You are also directed to attach the property of the defendant(s) not levied upon in the possession of: National City 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.

(2) 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.

(3) **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: \$2,939.78
INTEREST FROM from 10/01/2007: To Be Determined
ATTY'S COMM: \$
DATE: 11/01/2007

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



William A. Shaw

Prothonotary/Clerk Civil Division

Received this writ this 15th day
of Nov. A.D. 2007
At 1:30 A.M. P.M.

Chester A. Hawkes

Sheriff Amy Manley Harr

Requesting Party: Amy F. Doyle, Esq.
4660 Trindle Road, Ste. 300
Camp Hill, PA 17011
(717) 303-6700

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

Target National Bank, T/A Target Visa
f/k/a Retailers National Bank

Vs.

NO.: 2007-01605-CD

Rose M. Cockrell

National City Bank
Garnishee

TO THE SHERIFF OF CLEARFIELD COUNTY:

To satisfy the judgment, interest and costs against TARGET NATIONAL BANK, T/A Target Visa, f/k/a Retailers National Bank, Plaintiff(s) from ROSE M. COCKRELL, Defendant(s):

(1) You are directed to levy upon the property of the defendant(s) and to sell defendant's interest(s) therein:
Personal Property

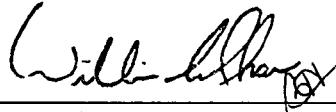
You are also directed to attach the property of the defendant(s) not levied upon in the possession of: National City Bank as garnishee(s): ALL ACCOUNTS INCLUDING BUT NOT LIMITED TO ALL SAVINGS, CHECKING AND OTHER ACCOUNTS, CERTIFICATES OF DEPOSIT, NOTES RECEIVABLES, COLLATERAL, PLEDGES, DOCUMENTS OF 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.

(2) 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.

(3) **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: \$2,939.78
INTEREST FROM 10/01/2007: To Be Determined
ATTY'S COMM: \$
DATE: 11/01/2007

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


William A. Shaw

Prothonotary/Clerk Civil Division

Received this writ this 1st day
of Nov. A.D. 2007
At 1:30 A.M. (P.M.)

Sheriff

Chester A. Haupers
Amy Mandy Haupers

Requesting Party: Amy F. Doyle, Esq.
4660 Trindle Road, Ste. 300
Camp Hill, PA 17011
(717) 303-6700

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

TARGET NATIONAL BANK
T/A TARGET VISA
FKA RETAILERS NATIONAL BANK
Plaintiff

vs.

ROSE M COCKRELL

Defendant(s)

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

JUDGMENT NO. 2007-1605-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 \$2,939.78.

(1) Directed to the Sheriff of CLEARFIELD County, Pennsylvania;
(2) against, ROSE M COCKRELL located at 2689 CARSON HILL RD , DU BOIS, PA 15801, Defendant(s);
(3) and against, NATIONAL CITY BANK located at 200 N BRADY ST , DU BOIS, PA 15801, Garnishee(s);
(4) and index this writ
(a) against, ROSE M COCKRELL , Defendant(s) and
(b) against, NATIONAL CITY 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***

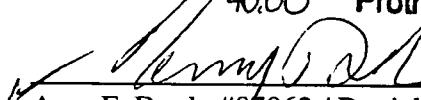
You are directed to attach the property of the Defendant(s) not levied upon in the possession of
NATIONAL CITY BANK located at 200 N BRADY ST , DU BOIS, PA 15801, Garnishee(s).

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	\$2,939.78
Interest from 10/01/2007	To Be Determined
At an interest rate of 6% per year	

Total \$2,939.78 Plus costs & interest
40.00 Prothonotary costs

Date: 10/29/07

 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 / Ronald S. Canter #94000

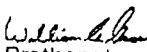
Wolpoff & Abramson, L.L.P.

Attorneys in the Practice of Debt Collection
4660 Trindle Road, Suite 300
Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

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

NOV 01 2007

Attest.


William L. Brown
Prothonotary/
Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

TARGET NATIONAL BANK
T/A TARGET VISA
FKA RETAILERS NATIONAL BANK
Plaintiff

No. 2007-1605-CD

VS

CIVIL ACTION - LAW

ROSE M COCKRELL
Defendant(s)

INTERROGATORIES TO GARNISHEE

TO: NATIONAL CITY BANK
200 N BRADY ST
DU BOIS, PA 15801

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.

INTERROGATORIES TO GARNISHEE
DEFENDANT(S) - ROSE M COCKRELL

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.

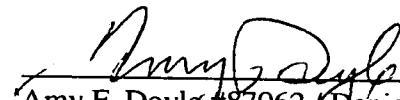
6. **REAL OR PERSONAL PROPERTY:** At the time you were served or at any subsequent time, state whether or not Defendant(s) owns any personal property that was in your possession and/or control. If so, include a full description of all personal property giving full value and present location. State also 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: 10/29/07


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 / 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

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

TARGET NATIONAL BANK
T/A TARGET VISA
FKA RETAILERS NATIONAL BANK
Plaintiff

No. 2007-1605-CD

VS

CIVIL ACTION - LAW

ROSE M COCKRELL
Defendant(s)

INTERROGATORIES TO GARNISHEE

TO: NATIONAL CITY BANK
200 N BRADY ST
DU BOIS, PA 15801

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.

RECEIVED
MAY 11 2007
WILLIAM A. SHAW
Clerk of Court
No. 4/C (6K)

INTERROGATORIES TO GARNISHEE
DEFENDANT(S) - ROSE M COCKRELL

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.

Checking account 102623233 had a balance of \$ 3.23
The account was frozen for the amount of wuit

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.

See #1

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.

See #1

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.

See #1

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?

The balance in checking account is still the same

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.

See 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.

See #1

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.

See #1

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.

No

Date: 10/29/07

Amy 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 / 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

VERIFICATION

I verify that the statements made in these Answers to Interrogatories are true and correct. I understand that false statements herein are made subject to the penalties of 18Pa. C.S. 4904 relating to unsworn falsification to authorities.

Date 11/26/07

Ray Shar

Attachment Team Leader

Interrogatories submitted by:

Elizabeth Fosse

Attachment Verification Specialist

Elizabeth Fosse
Special Services Processor
National City Bank
4100 West 150th Street
Cleveland, OH 44135
216-257-5827

National City Edits

11/28/07

PAGE 1

CLEARFIELD COUNTY
ALLEN D. BIETZ
PROTHONOTARY
COURTHOUSE
2ND & MARKET STREETS
PO BOX 549, CLEARFIELD PA 16335

ITEM NUMBER
325-01-4616050000-004

TO WHOM IT MAY CONCERN

PLEASE FIND ENCLOSED THE ANSWERS TO INTERROGATORIES FROM NATIONAL CITY.

SINCERELY,

VICKIE DAVIS
SPECIAL SERVICES DEPARTMENT
614-887-7792

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

TARGET NATIONAL BANK
FKA RETAILERS NATIONAL BANK
Plaintiff

No. 2007-1605-CD

VS

CIVIL ACTION - LAW

ROSE M COCKRELL
Defendant(s)

PRAECIPE TO DISCONTINUE ATTACHMENT EXECUTION

To the Prothonotary:

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

Respectfully Submitted,

Date: 12/5/07



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 / 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

CC: KATHERINE FORCEY ESQ
211 E LOCUST ST
CLEARFIELD PA 16830

FILED NO
M 10/5/07
DEC 07 2007
GK

William A. Shaw
Prothonotary/Clerk of Courts