

**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-CO

CIVIL ACTION - LAW

**FILED**

OCT 01 2007  
m 12:30/43  
William A. Shaw  
Prothonotary/Clerk of Courts  
I came w/ notice  
to Amy + Ben

PRAECIPE 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.

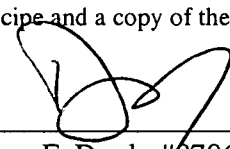
(X)	Amount due	\$2,939.78
	TOTAL	\$2,939.78, plus interest and costs

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

( ) 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. Warholc #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

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)

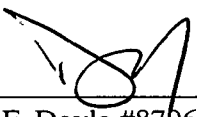
AFFIDAVIT OF NON-MILITARY SERVICE

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.

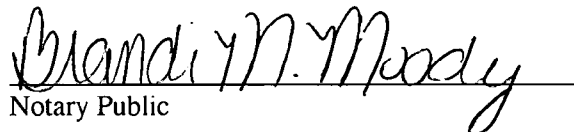
Date:

9/25/07

  
\_\_\_\_\_  
Amy F. Doyle #87062 / Daniel F. Wolfson #20617  
Philip C. Warholik #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

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 25<sup>th</sup> day of September, 2007.

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

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: **CLEARFIELD**

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

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**

PLAINTIFF: **TARGET NATIONAL BANK**  
**4660 TRINDLE ROAD**  
**C/O WOLPOFF & ABRAMSON**  
**CAMP HILL, PA 17011**  
VS.  
DEFENDANT: **COCKRELL, ROSE M**  
**2689 CARSON HILL ROAD**  
**DUBOIS, PA 15801**

**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**

☒ Judgment was entered for: (Name) **TARGET NATIONAL BANK**

☒ Judgment was entered against: (Name) **COCKRELL, ROSE M**  
in the amount of \$ **2,939.78**

☐ Defendants are jointly and severally liable.

☐ Damages will be assessed on Date & Time \_\_\_\_\_

☐ This case dismissed without prejudice.

☐ Amount of Judgment Subject to Attachment/42 Pa.C.S. § 8127  
\$ \_\_\_\_\_

☐ Portion of Judgment for physical damages arising out of  
residential lease \$ \_\_\_\_\_

Amount of Judgment	\$ <b>2,850.78</b>
Judgment Costs	\$ <b>89.00</b>
Interest on Judgment	\$ <b>.00</b>
Attorney Fees	\$ <b>.00</b>
<b>Total</b>	\$ <b>2,939.78</b>
Post Judgment Credits	\$ _____
Post Judgment Costs	\$ _____
<b>Certified Judgment Total</b>	\$ _____

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 882001

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.

3-15-07 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:

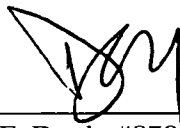
Target National Bank  
3701 Wayzata Blvd  
Mailstop 3C-G  
Minneapolis MN 54416

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:

9/25/17



Amy F. Doyle #87062 / Daniel F. Wolfson #20617  
Philip C. Warholc #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)

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.

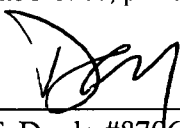
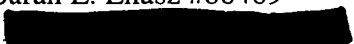
- |   |                                     |  |
|---|-------------------------------------|--|
| <input type="checkbox"/> Decree Nisi in Equity  | <input type="checkbox"/> Confession | <input type="checkbox"/> Verdict           |
| <input type="checkbox"/> Final Decree in Equity | <input type="checkbox"/> Default    | <input type="checkbox"/> Non-suit          |
| <input type="checkbox"/> Judgment of            | <input type="checkbox"/> Non-pros   | <input type="checkbox"/> Arbitration Award |
- (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 E. Wolfson #20617  
Philip C. Warholc #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

VS

ROSE M COCKRELL  
Defendant(s)

:  
: No.   
:  
:  
:  
: CIVIL ACTION - LAW

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

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

vs.

JUDGMENT NO. 2007-1605-CD

ROSE M COCKRELL

PRAECIPE FOR WRIT OF EXECUTION  
(MONEY JUDGMENT)

Defendant(s)

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).

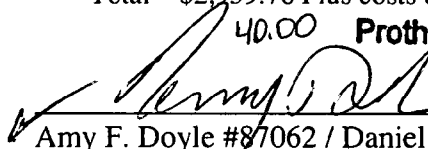
All accounts including but not limited to all savings, checking and other accounts, certificates of deposit, notes  
receivables, collateral, pledges, documents of title, securities, coupons and safe deposit boxes.

Amount due  
Interest from 10/01/2007  
At an interest rate of 6% per year

\$2,939.78  
To Be Determined

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** Atty pd.  
m/12:15/07 20.00  
NOV 01 2007

William A. Shaw  
Prothonotary/Clerk of Courts

4cc 06 writs  
to Sheriff  
(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.

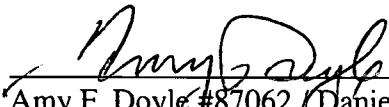
6. REAL OR PERSONAL PROPERTY: At the time you were served or at any subsequent time, state whether or not Defendant(s) owns any personal property that was in your possession and/or control. If so, include a full description of all personal property giving full value and present location. State also whether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

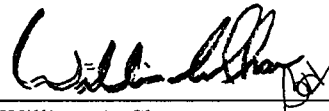
- (1) You are directed to levy upon the property of the defendant(s) and to sell defendant's interest(s) therein:  
Personal Property

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 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.

\_\_\_\_\_  
Sheriff

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

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.  
012:404m  
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 Marilyn Harris*

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):

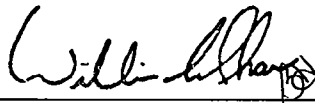
- (1) You are directed to levy upon the property of the defendant(s) and to sell defendant's interest(s) therein:  
Personal Property

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 15<sup>th</sup> day  
of Nov. A.D. 2007  
At 1:30 A.M. (P.M.)

Chester A. Hawley  
Sheriff by Maury Harn

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):

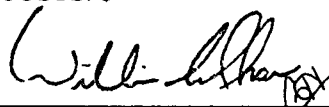
- (1) You are directed to levy upon the property of the defendant(s) and to sell defendant's interest(s) therein:  
Personal Property

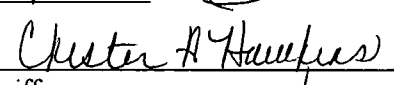
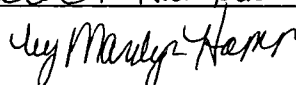
You are also directed to attach the property of the defendant(s) not levied upon in the possession of: National City Bank as garnishee(s): ALL ACCOUNTS INCLUDING BUT NOT LIMITED TO ALL SAVINGS, CHECKING AND OTHER ACCOUNTS, CERTIFICATES OF DEPOSIT, NOTES RECEIVABLES, COLLATERAL, PLEDGES, DOCUMENTS OF 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 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 1<sup>st</sup> day  
of Nov. A.D. 2007  
At 1:30 A.M. (P.M.)  
  
\_\_\_\_\_  
Sheriff 

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

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

vs.

ROSE M COCKRELL

JUDGMENT NO. 2007-1605-CD

Defendant(s)

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.

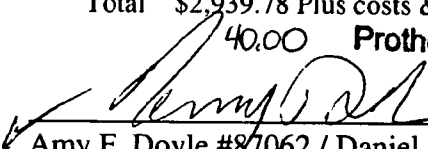
Amount due  
Interest from 10/01/2007  
At an interest rate of 6% per year

\$2,939.78  
To Be Determined

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

Date:

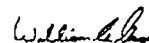
10/29/07

  
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

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

NOV 01 2007

Attest.

  
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.

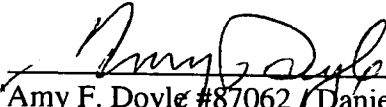
3. If you are a bank or other financial institution, at the time you were served or at any subsequent time did the defendant have funds on deposit in an account in which the funds on deposit, not including any otherwise exempt funds, did not exceed the amount of the general monetary exemption under 42 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. Warholc #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

FILED  
JUL 11 2007  
WILLIAM A. SHAW  
Clerk of Court  
No 9/c (sk)

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.

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

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).

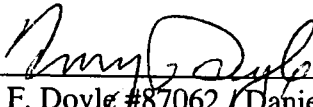
NO

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 F. Doyle #87062 / Daniel F. Wolfson #20617  
Philip C. Warholc #86341 / David R. Galloway #87326  
Tonilye 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 18 Pa. C.S. 4904 relating to unsworn falsification to authorities.

Date

11/26/08

*Roy Shivers*

Attachment Team Leader

Interrogatories submitted by:

*Elisabeta France*

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

Attachment Verification Specialist

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 E. Wolfson #20617  
Philip C. Warholc #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  
cc  
m/12/5/07  
DEC 07 2007 (GA)

William A. Shaw  
Prothonotary/Clerk of Courts