

07-1851-CD

Target Natl Bank vs G. Brown

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK/TARGET VISA)

Plaintiff)

) NO. 07-1851-CD

v.)

GAYLENE BROWN)

Defendant(s))

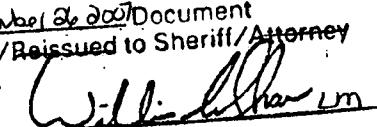
**COMPLAINT IN CIVIL
ACTION**

Filed on behalf of:
TARGET NATIONAL
BANK/TARGET VISA

Counsel of Record for This Party:

Gregg L. Morris, Esquire
Pa I.D. #69006

Patenaude & Felix, A.P.C.
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

December 26, 2007 Document
Reinstated/Reissued to Sheriff/Attorney
for service.

Deputy Prothonotary

FILED *Atty pd \$5.00*
NOV 13 2007 *11:08 AM* *ICC Sheriff*

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK/TARGET VISA)
Plaintiff) NO.
v.)
GAYLENE BROWN)
Defendant(s))

NOTICE TO DEFEND

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within TWENTY (20) DAYS after this Complaint and notice are served, by entering a written appearance personally or by an attorney, and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

Usted ha sido demandado en corte. Si usted desea defendese de las demandas que se presentan mas adelante en las siguientes paginas, debe tomar accion dentro de los proximos veinte (20) dias despues de la notificacion de esta Demanda y Aviso radicando personalmente o por medio de un abogado una comparecencia escrita y radicando en la Corte por escrito sus defensas de, y objeciones a, las demandas presentadas aqui en contra suya. Se le advierte de que si usted fall de tomar accion como se describe anteriormente, el caso pude proceder sin usted y un fallo por cualquier suma de dinero reclamada en la demanda o cualquier reclamacion o remedio solicitado por el demandante puede ser dictado en contra suya por la Corte sin mas aviso adicional. Usted puede perder dinero o propiedad au otros derechos importantes para usted.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER

USTED DEBE LLEVAR ESTE DOCUMENTO A SU
ABOGADO INMEDIATAMENTE. SI USTED NO TIENE
UN ABOGADO, LLAME O VAYA A LA SIGUIENTE
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CLEARFIELD COUNTY COURTHOUSE
DAVID S. MEHOLICK, COURT
ADMINISTRATOR
230 EAST MARKET STREET
CLEARFIELD, PA 16830
814-765-2641

NO COURT PERSONNEL QUE CHIEGAN.
CLEARFIELD COUNTY COURTHOUSE
DAVID S. MEHOLICK, COURT
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230 EAST MARKET STREET
CLEARFIELD, PA 16830
814-765-2641

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PENNSYLVANIA

TARGET NATIONAL BANK/TARGET VISA)
Plaintiff) NO.
v.)
GAYLENE BROWN)
Defendant(s))

COMPLAINT IN CIVIL ACTION

AND NOW, comes Plaintiff, TARGET NATIONAL BANK/TARGET VISA , by and through its attorney, GREGG MORRIS, ESQUIRE and the law offices of PATENAUME & FELIX, A.P.C. and files the following **Complaint in Civil Action**, and in support thereof aver as follows:

1. Plaintiff, TARGET NATIONAL BANK/TARGET VISA , is a corporation and for the purpose of this litigation, maintaining a place of business c/o PATENAUME AND FELIX, A.P.C., 213 East Main St Carnegie, Pennsylvania 15106.
2. Defendant is GAYLENE BROWN, an adult individual, believed to currently reside at 483 HOUTZ ST HOUTZDALE, PA 16651-8506.
3. Heretofore, the Defendant(s) opened a account with Plaintiff being Account No.: 4352376696712017, for the purchase of good and services.
4. The Defendant(s) has/have made or authorized a number of purchases and as of September 25, 2007, Defendant(s) owes \$2,752.69 on said account plus interest at 0.00 %.
5. Plaintiff maintains accurate books of account recording all credits and debits for

this account.

6. The Defendant(s) have/has received monthly billing statements from Plaintiff setting forth the nature and amount of all charges made by Defendant(s), and the transactions between Plaintiff and Defendant(s) give rise to an account stated, upon which Plaintiff has relied.

7. The Defendant(s) made payments, but have/has refused to pay, and now refuses to pay the balance due and owing on the aforesaid account in the sum of \$2,752.69, plus interest and costs.

8. By failing to object or dispute the statements, Defendant(s) have/has assented to and agreed to the correctness of the balance due on the credit card account so as to constitute and account stated.

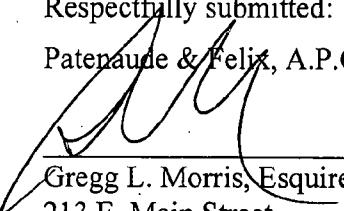
9. Despite repeated demands, Defendant(s) have/has failed to make the required installment payments when due and therefore the full amount of the account is now due and payable.

WHEREFORE, Plaintiff demands Judgment in its favor, and against Defendant(s), in the amount of \$2,752.69, plus legal interest from the date of breach, with continuing interest at the legal rate thereon from the date of Judgment plus costs. The damages requested are less than the maximum amount for compulsory arbitration as set by the Court.

Respectfully submitted:

Patenaude & Felix, A.P.C.

Date: _____



Gregg L. Morris, Esquire
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675



TARGET

UT 16020



00000

Account Number: 4352-3766-9671-2017
GAYLENE BROWN

Statement Closing Date: September 25, 2007
Page 1 of 2

Target Visa Credit Card Account Summary

Total Credit Limit \$0
Cash Limit \$0
Available Credit \$0
Portion Available for Cash \$0
The Cash Limit is a portion of the Total Credit Limit

Previous Balance	\$2,717.69
Payments & Credits	0.00
Purchases & Advances	0.00
Other Charges	35.00
FINANCE CHARGES	0.00
New Balance	\$2,752.69
Amount Past Due	\$729.38
Minimum Payment Due	\$2,752.69
(includes any Amount Past Due)	

Payment Due Date October 20, 2007

Questions? Call Us:

Target Credit Services 1-888-755-5856
TDD/TDY 1-800-347-5842
Outside the U.S. 11-612-307-8622 (Call Collect)

Calling will not preserve your billing-error rights

Payments & Credits

No payments or credits were received last month.

Other Charges

Sep. 19	LATE PAYMENT FEE	\$35.00
	Total Other Charges	\$35.00

Target National Bank, an affiliate of Target Stores

NOTICE: SEE REVERSE SIDE FOR IMPORTANT INFORMATION



TARGET

INCLUDE THIS PORTION WITH YOUR PAYMENT MADE PAYABLE TO TARGET NATIONAL BANK



Account Number 4352-3766-9671-2017
New Balance \$2,752.69
Minimum Payment Due \$2,752.69
Payment Due Date October 20, 2007

NEW PHONE, HOME OR
E-MAIL ADDRESS?
PLEASE UPDATE ON
REVERSE SIDE.

OFFICE COPY

STATEMENT PAGE NOT PRINTED

|||||
TARGET NATIONAL BANK
P.O. BOX 59317
MINNEAPOLIS, MN 55459-0317

Amount
Enclosed

\$

GAYLENE BROWN
483 HOUTZ ST
HOUTZDALE, PA 16651-8506



2001550275269027526990435237669671201771



TARGET



00000

Account Number: 4352-3766-9671-2017
GAYLENE BROWN

Statement Closing Date: September 25, 2007
Page 2 of 2

Finance Charges

Days in Billing Period: 31

Balance Type	Daily Periodic Rate	Corresponding Annual Percentage Rate	Average Daily Balance	Periodic FINANCE CHARGE	Transaction FINANCE CHARGE
Purchases	0.07736%	28.24%	\$0.00	\$0.00	\$0.00
Cash	0.07736%	28.24%	\$0.00	\$0.00	\$0.00
Total FINANCE CHARGES:					\$0.00
Actual ANNUAL PERCENTAGE RATE:					0.00%

There is a minimum FINANCE CHARGE of \$1.00 for any billing period in which a Finance Charge is imposed.

In _____ Court

_____ Judicial (Circuit/District)

Original Creditor Name: TARGET NATIONAL BANK

Debtor Name: BROWN, GAYLENE

Co-Debtor Name:

Account Number: 4352376696712017

AFFIDAVIT OF ACCOUNT

STATE OF MINNESOTA

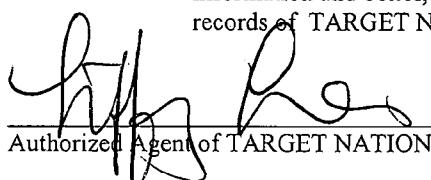
COUNTY OF HENNEPIN

ss:

The undersigned, TIFFANY LEWIS states that:

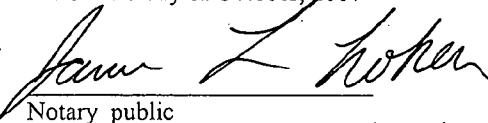
1. I am a representative of TARGET NATIONAL BANK and am authorized to Verify current balances due and owing to TARGET NATIONAL BANK on credit card accounts.
2. As of the date of this affidavit I have reviewed the records of the above listed person and account, and that the amount due and owing to TARGET NATIONAL BANK on this account, over and above all known legal set offs is \$2752.69.
3. That reasonable inquiry has been made to determine if the defendant is in the military service of the United States of America, and to the best of my knowledge that defendant is not in such military service and is therefore not entitled to the rights and privileges provided under the Soldiers and Sailors Civil-Relief Act of 1940, as amended.

That the above information is true to the best of my knowledge, information and belief, and based upon the books and business records of TARGET NATIONAL BANK.



Authorized Agent of TARGET NATIONAL BANK

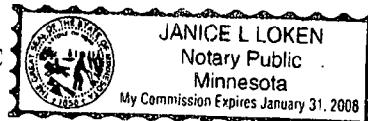
Subscribed and sworn to before
Me on 2nd day of October, 2007



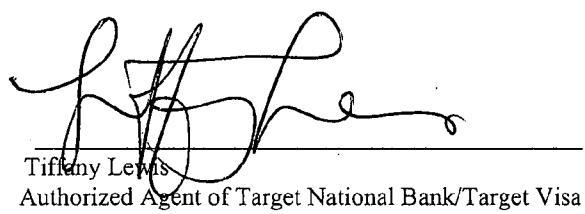
Notary public

My commission expires: 1/31/08

4352376696712017
A144 PATENAUXE & FELIX, A.P.C



The undersigned does hereby verify subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities, that she is, Tiffany Lewis, Assistant Secretary, of Target National Bank, Plaintiff Herein, that she is duly authorized to make this Declaration, and hat the facts set forth in the foregoing Complaint in Civil Action are true and correct to the best of her knowledge, information and belief.



Tiffany Lewis
Authorized Agent of Target National Bank/Target Visa

4352376696712017
A144
PATENAUX & FELIX, A.P.C

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK/TARGET VISA)
Plaintiff) NO. 07-1851-CD
v.)
GAYLENE BROWN)
Defendant(s))

**PRAECIPE TO
REINSTATE
COMPLAINT**

Filed on behalf of:
TARGET NATIONAL
BANK/TARGET VISA

Counsel of Record for This Party:

Gregg L. Morris, Esquire
Pa I.D. #69006

Patenaude & Felix, A.P.C.
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

FILED Atty pd.
M 11/20/2007 7:00
DEC 26 2007
Complaint
William A. Shaw
Prothonotary/Clerk of Courts
Reinstated to
Sheriff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK/TARGET VISA)
Plaintiff) NO. 07-1851-CD
v.)
GAYLENE BROWN)
Defendant(s))

PRAECIPE TO REINSTATE COMPLAINT

TO: Prothonotary

Please reinstate Complaint in Civil Action on behalf of Plaintiff, TARGET NATIONAL BANK/TARGET VISA and against Defendant(s), above named. Thank you.

Respectfully submitted:
Paternoade & Felix, A.P.C.

Date: _____

Gregg L. Morris, Esquire
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK/TARGET VISA)
Plaintiff) NO. 07-1851-CD
v.)
GAYLENE BROWN)
Defendant(s))

**PLAINTIFF'S PRAECIPE FOR
CONSENT TO ENTRY OF
JUDGMENT**

Filed on behalf of:
TARGET NATIONAL
BANK/TARGET VISA

Counsel of Record for This Party:

Gregg L. Morris, Esquire
Pa I.D. #69006

Patenaude & Felix, A.P.C.
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

FILED Atty pd. 20.00
M 1/53/07
FEB 04 2007 ICC Notice
to Def.

William A. Shaw
Prothonotary/Clerk of Courts Statement to

Atty
(BD)

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK/TARGET VISA)
Plaintiff) NO. 07-1851-CD
v.)
GAYLENE BROWN)
Defendant(s))

CONSENT TO ENTRY OF JUDGMENT

The undersigned Defendant, having been served with a **Complaint in Civil Action** in the matter captioned above, hereby admits the averments contained in said Complaint, waives any defect of service, waives any applicable time period for the filing of a responsive pleading, waives service of a Ten Day Notice or Notice of Default, and hereby consents to the entry of judgment against him in the amount of \$2,752.69 plus interest at the legal rate per annum, and the costs of suit. The parties agree that execution will be stayed, and the judgment will be satisfied provided Defendant pays \$3,044.69 at the rate of \$200.00 due on or before January 28, 2008 and subsequent payments of \$125.00 due every thirty (30) days thereafter. Time is of the essence. Defendant hereby waives Notice of Entry of Judgment.

Date: 1-23-08

Gaylene Brown
Gaylene Brown

PRAECLP TO ENTER JUDGMENT

To the Prothonotary:

Please enter judgment against the Defendant(s) in the amount of \$2,752.69, plus interest and costs of suit.

Respectfully submitted:

~~Patenaude & Felix, A.P.C.~~

Date: _____

~~Gregg L. Morris, Esquire
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675~~

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK/TARGET VISA

)

Plaintiff

)

NO. 07-1851-CD

)

)

)

)

v.

)

)

)

Defendant(s)

)

)

GAYLENE BROWN

**NOTICE OF ORDER, DECREE
OR JUDGMENT**

Filed on behalf of:
TARGET NATIONAL
BANK/TARGET VISA

Counsel of Record for This Party:

Gregg L. Morris, Esquire
Pa I.D. #69006

Patenaude & Felix, A.P.C.
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

•IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

copy

TARGET NATIONAL BANK/TARGET VISA)
Plaintiff) NO. 07-1851-CD
v.)
GAYLENE BROWN)
Defendant(s))

NOTICE OF ORDER, DECREE OR JUDGMENT

TO: () Plaintiff (x) Defendant () Garnishee () Additional Defendant

You are hereby notified that the following Order, Decree, or Judgment has been entered against you on February 4, 2008

(X) Judgment in the amount of \$2,752.69, plus costs.
() District Justice Transcript of Judgment in the amount of _____, plus costs.
() If not satisfied within sixty (60) days, your motor vehicle operator's license will be suspended by the Department of Transportation.

Prothonotary

By William H. Gray, Jr.
Deputy

If you have questions concerning the above, please Contact:

Name of Attorney: GREGG MORRIS, Esquire
213 East Main St
Carnegie PA 15106
(412)-429-7675

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

COPY

Target National Bank
Target Visa
Plaintiff(s)

No.: 2007-01851-CD

Real Debt: \$2,752.69

Atty's Comm: \$

Vs.

Costs: \$

Gaylene Brown
Defendant(s)

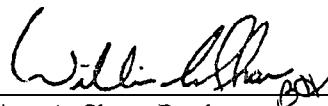
Entry: \$20.00

Instrument: Consent Judgment

Date of Entry: February 4, 2008

Expires: February 4, 2013

Certified from the record this 4th day of February, 2008



William A. Shaw, Prothonotary

SIGN BELOW FOR SATISFACTION

Received on _____, _____, of defendant full satisfaction of this Judgment,
Debt, Interest and Costs and Prothonotary is authorized to enter Satisfaction on the same.

Plaintiff/Attorney

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 1 of 1 Services

Sheriff Docket # 103432

Case # 07-1851-CD

TARGET NATIONAL BANK/TARGET VISA

vs.

GAYLENE BROWN

TYPE OF SERVICE COMPLAINT

SHERIFF RETURNS

NOW February 28, 2008 RETURNED THE WITHIN COMPLAINT "NOT SERVED, TIME EXPIRED" AS TO GAYLENE BROWN, DEFENDANT. ATTEMPTED, NOT HOME

DEFENDANT CALLED SHERIFF'S OFFICE AFTER COMPLAINT WAS EXPIRED TO SET UP DATE/TIME FOR SERVICE.

SERVED BY: /

Return Costs

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	PATENAUDA	17250	10.00
SHERIFF HAWKINS	PATENAUDA	17250	48.92

FILED

FEB 28 2008

013:30/8

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before me This

So Answers.

_____ Day of _____ 2008

Chesler Hawkins
by Marilyn Hager

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK/TARGET VISA

Plaintiff

) NO. 07-1851-CD

v.

GAYLENE BROWN

Defendant(s)

**COMPLAINT IN CIVIL
ACTION**

Filed on behalf of:
TARGET NATIONAL
BANK/TARGET VISA

Counsel of Record for This Party:

Gregg L. Morris, Esquire
Pa I.D. #69006

Patenaude & Felix, A.P.C.
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

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

NOV 13 2007

Attest.

William L. Morris
Prothonotary/
Clerk of Courts

I HEREBY CERTIFY THAT
THIS IS A TRUE AND
CORRECT COPY OF
THE ORIGINAL AS FILED.

Gregg L. Morris, Esquire
GREGG L. MORRIS, ESQUIRE

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK/TARGET VISA)
Plaintiff) NO.
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CLEARFIELD COUNTY COURTHOUSE
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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
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Defendant(s))

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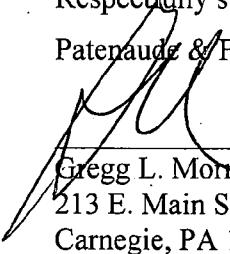
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Respectfully submitted:

Patenaude & Felix, A.P.C.

Date: _____



Gregg L. Morris, Esquire
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675



Account Number: 4352-3766-9671-2017
GAYLENE BROWN

U1-161020



00000

Statement Closing Date: September 25, 2007
Page 1 of 2

Target Visa Credit Card Account Summary

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Cash Limit \$0
Available Credit \$0
Portion Available for Cash \$0
The Cash Limit is a portion of the Total Credit Limit

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Purchases & Advances	0.00
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FINANCE CHARGES	0.00
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Questions? Call Us:

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Other Charges

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Total Other Charges	\$35.00

Target National Bank, an affiliate of Target Stores

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INCLUDE THIS PORTION WITH YOUR PAYMENT MADE PAYABLE TO TARGET NATIONAL BANK



TARGET.



Account Number 4352-3766-9671-2017
New Balance \$2,752.69
Minimum Payment Due \$2,752.69
Payment Due Date October 20, 2007

NEW PHONE, HOME OR
E-MAIL ADDRESS?
PLEASE UPDATE ON
REVERSE SIDE.

OFFICE COPY

STATEMENT PAGE NOT PRINTED

|||||
TARGET NATIONAL BANK
P.O. BOX 59317
MINNEAPOLIS, MN 55459-0317

Amount
Enclosed



GAYLENE BROWN
483 HOUTZ ST
HOUTZDALE, PA 16651-8506



2001550275269027526990435237669671201771



TARGET



00000

Account Number: 4352-3766-9671-2017
GAYLENE BROWN

Statement Closing Date: September 25, 2007
Page 2 of 2

Finance Charges

Days in Billing Period: 31

Balance Type	Daily Periodic Rate	Corresponding Annual Percentage Rate	Average Daily Balance	Periodic FINANCE CHARGE	Transaction FINANCE CHARGE
Purchases	0.07736%	28.24%	\$0.00	\$0.00	\$0.00
Cash	0.07736%	28.24%	\$0.00	\$0.00	\$0.00
Total FINANCE CHARGES:					\$0.00
Actual ANNUAL PERCENTAGE RATE:					0.00%

There is a minimum FINANCE CHARGE of \$1.00 for any billing period in which a Finance Charge is imposed.

In _____ Court

Judicial (Circuit/District)

Original Creditor Name: TARGET NATIONAL BANK

Debtor Name: BROWN, GAYLENE

Co-Debtor Name:

Account Number: 4352376696712017

AFFIDAVIT OF ACCOUNT

STATE OF MINNESOTA

COUNTY OF HENNEPIN

ss:

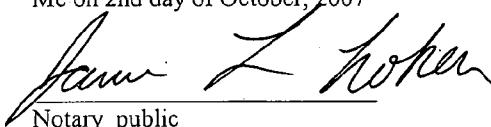
The undersigned, TIFFANY LEWIS states that:

1. I am a representative of TARGET NATIONAL BANK and am authorized to Verify current balances due and owing to TARGET NATIONAL BANK on credit card accounts.
2. As of the date of this affidavit I have reviewed the records of the above listed person and account, and that the amount due and owing to TARGET NATIONAL BANK on this account, over and above all known legal set offs is \$2752.69.
3. That reasonable inquiry has been made to determine if the defendant is in the military service of the United States of America, and to the best of my knowledge that defendant is not in such military service and is therefore not entitled to the rights and privileges provided under the Soldiers and Sailors Civil Relief Act of 1940, as amended.

That the above information is true to the best of my knowledge, information and belief, and based upon the books and business records of TARGET NATIONAL BANK.


Authorized Agent of TARGET NATIONAL BANK

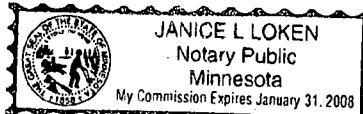
Subscribed and sworn to before
Me on 2nd day of October, 2007


Notary public

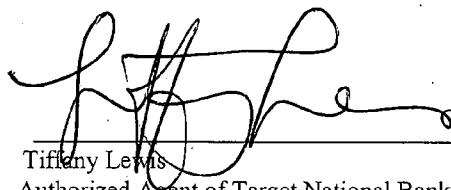
My commission expires: 1/31/08

4352376696712017

A144 PATENAUXE & FELIX, A.P.C



The undersigned does hereby verify subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities, that she is, Tiffany Lewis, Assistant Secretary, of Target National Bank, Plaintiff Herein, that she is duly authorized to make this Declaration, and hat the facts set forth in the foregoing Complaint in Civil Action are true and correct to the best of her knowledge, information and belief.



Tiffany Lewis
Authorized Agent of Target National Bank/Target Visa

4352376696712017
A144
PATENAUME & FELIX, A.P.C.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103597
NO: 07-1851-CD
SERVICE # 1 OF 1
COMPLAINT

FILED

PLAINTIFF: TARGET NATIONAL BANK/TARGET VISA
vs.
DEFENDANT: GAYLENE BROWN

FEB 28 2008

073-361-45

William A. Shaw
Prothonotary/Clerk of Courts

SHERIFF RETURN

NOW, January 15, 2008 AT 11:15 AM SERVED THE WITHIN COMPLAINT ON GAYLENE BROWN DEFENDANT AT 483 HOUTZ ST., HOUTZDALE, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO GAYLENE BROWN, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DAVIS / MORGILLO

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	PATENAUME	18091	10.00
SHERIFF HAWKINS	PATENAUME	18091	27.18

Sworn to Before Me This

____ Day of _____ 2008

So Answers,

*Chester A. Hawkins
by Marilyn Harris*

Chester A. Hawkins
Sheriff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK

)

Plaintiff

) NO. 07-1851-CD

v.

)

GAYLENE BROWN

)

Defendant(s)

)

FIRST COMMONWEALTH BANK

)

Garnishee

)

**PRAECIPE FOR WRIT OF
EXECUTION**

Filed on behalf of:
TARGET NATIONAL BANK

Counsel of Record for This Party:

Gregg L. Morris, Esquire
Pa I.D. #69006

Patenaude & Felix, A.P.C.
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

FILED 3cc & 6 wnts
m 10:53 AM to Sheriff
FEB 23 2009 Atty pd. 20.00
William A. Shaw
Prothonotary/Clerk of Courts (610)

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK)
Plaintiff) NO. 07-1851-CD
v.)
GAYLENE BROWN)
Defendant(s))
FIRST COMMONWEALTH BANK)
Garnishee)

PRAECIPE FOR WRIT OF EXECUTION

To The Prothonotary:

Issue writ of execution in the above matter,

- (1) directed to the Sheriff of Clearfield County;
- (2) against, GAYLENE BROWN Defendant(s);
- (3) against, FIRST COMMONWEALTH BANK, Garnishee;
- (4) and index this writ
- (a) against, Defendant(s) GAYLENE BROWN, Defendant(s); and
- (b) against FIRST COMMONWEALTH BANK, Garnishee;

as a *lis pendens* against real property of the Defendant(s) in the name of the garnishee as follows:

(5) Amount due	<u>\$2,752.69</u>
Interest from February 04, 2008	<u>\$169.29</u>
At 6.00 % per annum	<u>\$</u>
(Costs to be added)	<u>132.60</u>

Prothonotary costs

Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK

Plaintiff

) NO. 07-1851-CD

v.

GAYLENE BROWN

Defendant(s)

FIRST COMMONWEALTH BANK

Garnishee

WRIT OF EXECUTION NOTICE

Filed on behalf of:

TARGET NATIONAL BANK

Counsel of Record for This Party:

Gregg L. Morris, Esquire
Pa I.D. #69006

Patenaude & Felix, A.P.C.
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK

Plaintiff

) NO. 07-1851-CD

v.

GAYLENE BROWN

Defendant(s)

FIRST COMMONWEALTH BANK

Garnishee

WRIT OF EXECUTION
NOTICE

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

The law provides that certain property cannot be taken. Such property is said to be exempt. There is a debtor's exemption of \$300. There are other exemptions which may be applicable to you. Attached is a summary of some of the major exemptions. You may have other exemptions or other rights.

If you have an exemption, you should do the following promptly: (1) Fill out the attached claim form and demand for a prompt hearing. (2) Deliver the form or mail it to the Sheriff's Office at the address noted.

You should come to court ready to explain your exemption. If you do not come to court and prove your exemption, you may lose some of your property.

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

CLEARFIELD COUNTY COURTHOUSE
DAVID S. MEHOLICK, COURT ADMINISTRATOR 230 EAST MARKET STREET
CLEARFIELD PA 16830
814-765-2641

MAJOR EXEMPTIONS UNDER
PENNSYLVANIA AND
FEDERAL LAW

- A. \$300 statutory exemption
- B. Bibles, school books, sewing machines, uniforms and equipment
- C. Most wages and unemployment compensation
- D. Social Security Benefits
- E. Certain retirement funds and accounts
- F. Certain veteran and armed forces benefits
- G. Certain insurance proceeds
- H. Such other exemptions as may be provided by law

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK

Plaintiff

) NO. 07-1851-CD

v.

GAYLENE BROWN

Defendant(s)

FIRST COMMONWEALTH BANK

Garnishee

CLAIM FOR EXEMPTION
TO THE SHERIFF:

I, the above named defendant, claim exemption of property from levy or attachment:

(1) From my personal property in my possession which has been levied upon,

(a) I desire that my \$300 statutory exemption be

_____ (i) set aside in kind (specify the property to be set aside in kind): _____

_____ (ii) paid in cash following exemption (specify the property and basis of the
exemption): _____

(2) From my property which is in the possession of a third party, I claim the following
exemptions:

(a) my \$300 statutory exemption be _____ in cash; _____ in kind (specify the property
to be set aside in kind): _____

(b) Social Security Benefits on deposit in the amount of \$ _____.

(c) other (specify the amount and the basis of the
exemption): _____

I request a prompt hearing to determine the exemption. Notice of the hearing should be given to me at the following address: _____

Telephone Number

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

Date: _____
Defendant

THIS CLAIM TO BE FILED WITH
THE OFFICE OF THE SHERIFF
OF CLEARFIELD COUNTY COURT OF COMMON PLEAS
CLEARFIELD, PA 16830

(814)-76-5-26

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK)

Plaintiff) NO. 07-1851-CD

v.)

GAYLENE BROWN)

Defendant(s))

FIRST COMMONWEALTH BANK)
Garnishee)

**INTERROGATORIES IN
ATTACHMENT EXECUTION**

Filed on behalf of:
TARGET NATIONAL BANK

Counsel of Record for This Party:

Gregg L. Morris, Esquire
Pa I.D. #69006

Patenaude & Felix, A.P.C.
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK

Plaintiff) NO. 07-1851-CD

v.

GAYLENE BROWN

Defendant(s)

FIRST COMMONWEALTH BANK

Garnishee

**OFFICES OF PATENAUME & FELIX
BY: GREGG MORRIS, ESQUIRE
213 East Main St
Carnegie PA 15106
858-244-7675**

You are hereby notified to
plead to the enclosed
Interrogatories within 20
days from the date of
hereof or a default
judgment may be entered
against you.

Gregg Morris, Esquire
Attorney for Plaintiff

INTERROGATORIES IN ATTACHMENT EXECUTION

You are required to answer the following interrogatories about Defendant(s) whose address is 483 HOUTZ ST., HOUTZDALE PA 16651-8506. You must file with the Court answers to the following interrogatories within twenty (20) days after service upon you. Failure to do so may result in a default judgment being entered against you. A copy of said answers must be served on the undersigned. If your answer to any of the following interrogatories is affirmative, specify the amount, value and/or nature of the subject property.

1. At the time you were served or at any subsequent time, did you owe the defendant(s) any money or were you liable to defendant(s) on any negotiable or other written instrument, or did defendant(s) claim that you owed them any money or were you liable to them for any reason? If yes, please specify as set forth herein.

2. At the time you were served, or at any subsequent time, was there in your possession, custody or control, or in joint possession, custody or control of yourself or others, any property of any nature owned solely or in party by the Defendant(s)? If yes, please list and describe the property.

3. At the time you were served, or at any subsequent time, did you hold legal title to any property or any nature owned solely or in part by the Defendant(s)? If yes please list and describe the property.

4. At the time you were served, or at any subsequent time, did you hold as fiduciary any property in which the Defendant(s) had an interest? If yes, please list and describe the property.

5. At any time before or after you were served, did the Defendant(s) transfer or deliver any property to you, or to any person, or place pursuant to your directions or consent? If yes, what was the consideration therefore?

6. At any time after you were served, did you pay, transfer, or deliver any money or property to the Defendant(s) or to any person or place pursuant to their direction, or otherwise discharge any claim of the Defendant(s) against you.

7. 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.

8. 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..

Respectfully submitted:
Patenaude & Felix, A.P.C.

Date: January 22, 2009

Gregg L. Morris, Esquire
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

COPY

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK

Plaintiff

) NO. 07-1851-CD

v.

GAYLENE BROWN

Defendant(s)

FIRST COMMONWEALTH BANK

Garnishee

WRIT OF EXECUTION

Filed on behalf of:
TARGET NATIONAL BANK

Counsel of Record for This Party:

Gregg L. Morris, Esquire
Pa I.D. #69006

Patenaude & Felix, A.P.C.
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK)
Plaintiff) NO. 07-1851-CD
v.)
GAYLENE BROWN)
Defendant(s))
FIRST COMMONWEALTH BANK)
Garnishee)

WRIT OF EXECUTION

To the Sheriff of Clearfield County:

To satisfy the judgment, interest and costs against GAYLENE BROWN, Defendant(s),

(1) You are directed to levy upon the property of the defendant(s) and to sell his interest therein;

(2) You are also directed to attach the property of the defendant(s) not levied upon in the possession of FIRST COMMONWEALTH BANK as Garnishee, and to notify garnishee that

(a) an attachment has issued;

(b) the garnishee is enjoined from paying any debt to or for the account of the defendant and from delivering any property of the defendant or otherwise disposing thereof;

(3) If property of the defendant not levied upon and subject to attachment is found in the possession of anyone other than a named garnishee, you are directed to notify him that he has been added as a garnishee and is enjoined as above stated.

Amount due	\$2,752.69
Interest from February 04, 2008	
At 6.00 % per annum	\$169.29
(Costs to be added)	\$

132.00 Prothonotary costs

Prothonotary

Seal

BY

2/23/09

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
NO: 07-1851-CD

TARGET NATIONAL BANK

vs

GAYLENE BROWN

TO: FIRST COMMONWEALTH BANK (Garnishee)

WRIT OF EXECUTION; INTERROGATORIES TO GARNISHEE

SERVE BY: 03/03/2009 ASAP HEARING: PAGE: 105312

DEFENDANT: FIRST COMMONWEALTH BANK, Garnishee
ADDRESS: 709 HANNA ST.

HOOTZDALE, PA 16651

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: GARNISHEE

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT

OCCUPIED William A. Shaw
Prothonotary/Clerk of Courts

ATTEMPTS

S FILED
09:00 AM
MAR - 5 2009
JW

SHERIFF'S RETURN

NOW, 2-27-09 AT 1:56 AM / PM SERVED THE WITHIN

WRIT OF EXECUTION; INTERROGATORIES TO GARNISHEE ON FIRST COMMONWEALTH BANK, Garnishee,
DEFENDANT

BY HANDING TO Diane Kaspick MANAGER

A TRUE AND ATTESTED COPY OF THE ORIGINAL DOCUMENT AND MADE KNOW TO HIM / HER THE CONTENTS
THEREOF.

ADDRESS SERVED 709 HANNA ST
Hootzdale, Pa. 16651

NOW _____ AT _____ AM / PM POSTED THE WITHIN

WRIT OF EXECUTION; INTERROGATORIES TO GARNISHEE FOR FIRST COMMONWEALTH BANK, Garnishee

AT (ADDRESS) _____

NOW _____ AT _____ AM / PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF **NOT FOUND** AS TO FIRST COMMONWEALTH BANK, Garnishee

REASON UNABLE TO LOCATE _____

SWORN TO BEFORE ME THIS

DAY OF 2009

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

Deputy Signature

Print Deputy Name

FILED NO CC
10:49 AM
MAR 06 2009

William A. Shaw
Prothonotary/Clerk of Courts

RECEIVED
MAR 02 2009

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK

Plaintiff) NO. 07-1851-CD

v.

GAYLENE BROWN

Defendant(s)

FIRST COMMONWEALTH BANK

Garnishee

Answers
**INTERROGATORIES IN
ATTACHMENT EXECUTION**

Filed on behalf of:
TARGET NATIONAL BANK

Counsel of Record for This Party:

Gregg L. Morris, Esquire
Pa I.D. #69006

Patenaude & Felix, A.P.C.
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK

Plaintiff) NO. 07-1851-CD

v.

GAYLENE BROWN

Defendant(s)

FIRST COMMONWEALTH BANK

Garnishee

OFFICES OF PATENAUME & FELIX
BY: GREGG MORRIS, ESQUIRE
213 East Main St
Carnegie PA 15106
858-244-7675

You are hereby notified to
plead to the enclosed
Interrogatories within 20
days from the date of
hereof or a default
judgment may be entered
against you.

Gregg Morris, Esquire
Attorney for Plaintiff

INTERROGATORIES IN ATTACHMENT EXECUTION

You are required to answer the following interrogatories about Defendant(s) whose address is 483 HOUTZ ST, HOUTZDALE PA 16651-8506. You must file with the Court answers to the following interrogatories within twenty (20) days after service upon you. Failure to do so may result in a default judgment being entered against you. A copy of said answers must be served on the undersigned. If your answer to any of the following interrogatories is affirmative, specify the amount, value and/or nature of the subject property.

1. At the time you were served or at any subsequent time, did you owe the defendant(s) any money or were you liable to defendant(s) on any negotiable or other written instrument, or did defendant(s) claim that you owed them any money or were you liable to them for any reason? If yes, please specify as set forth herein.

For all answers to this and the foregoing Interrogatories, see Exhibit "A" attached hereto and made part of hereof.

2. At the time you were served, or at any subsequent time, was there in your possession, custody or control, or in joint possession, custody or control of yourself or others, any property of any nature owned solely or in party by the Defendant(s)? If yes, please list and describe the property.

3. At the time you were served, or at any subsequent time, did you hold legal title to any property or any nature owned solely or in part by the Defendant(s)? If yes please list and describe the property.

4. At the time you were served, or at any subsequent time, did you hold as fiduciary any property in which the Defendant(s) had an interest? If yes, please list and describe the property.

5. At any time before or after you were served, did the Defendant(s) transfer or deliver any property to you, or to any person, or place pursuant to your directions or consent? If yes, what was the consideration therefore?

6. At any time after you were served, did you pay, transfer, or deliver any money or property to the Defendant(s) or to any person or place pursuant to their direction, or otherwise discharge any claim of the Defendant(s) against you.

7. 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.

8. 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..

Respectfully submitted:
Patenaude & Felix, A.P.C.

Date: January 22, 2009

Gregg L. Morris, Esquire
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

EXHIBIT "A"

ANSWERS TO INTERROGATORIES

1. Yes, checking account number 1100060202 into Daniel C. Brown or Gaylene R. Brown with a current balance of zero; account receives recurring direct deposits which are exempt from attachment and account relation is husband and wife therefore no funds were held.
2. No
3. No
4. No
5. No
6. No
7. Yes, see #1 above
8. N/A

VERIFICATION

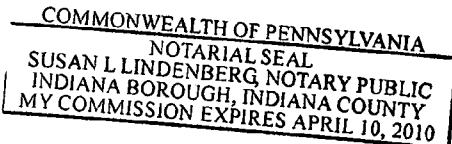
COMMONWEALTH OF PENNSYLVANIA)
COUNTY OF INDIANA)
)

On this 3rd day of March 2009 before me, the undersigned officer, a Notary Public in and for said Commonwealth and County, personally appeared JAMES BOYLE, who being duly sworn according to law, acknowledged that he is Vice President of First Commonwealth Bank, and that the facts set forth in the foregoing Interrogatories are true and correct to the best of his knowledge and belief.

James Boyle, Vice President
First Commonwealth Bank

Sworn and subscribed to before me
This, 3rd day of March 2009

Susan L. Lindenberger
Notary Public



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 105312
NO: 07-1851-CD
SERVICES 1
WRIT OF EXECUTION; INTERROGATORIES TO

GARNISHEE

PLAINTIFF: TARGET NATIONAL BANK
vs.
DEFENDANT: GAYLENE BROWN
TO: FIRST COMMONWEALTH BANK (Garnishee)

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	PATENAUME	37304	10.00
SHERIFF HAWKINS	PATENAUME	37304	37.80

5
FILED
03/5/09
MAR 06 2009
WM
William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

So Answers,

____ Day of _____ 2009



Chester A. Hawkins
Sheriff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK)

Plaintiff) NO. 07-1851-CD

v.)

GAYLENE BROWN)

Defendant(s))

FIRST COMMONWEALTH BANK)
Garnishee)

WRIT OF EXECUTION

Filed on behalf of:
TARGET NATIONAL BANK

Counsel of Record for This Party:

Gregg L. Morris, Esquire
Pa I.D. #69006

Patenaude & Felix, A.P.C.
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK)
Plaintiff) NO. 07-1851-CD
v.)
GAYLENE BROWN)
Defendant(s))
FIRST COMMONWEALTH BANK)
Garnishee)

WRIT OF EXECUTION

To the Sheriff of Clearfield County:

To satisfy the judgment, interest and costs against GAYLENE BROWN, Defendant(s),

(1) You are directed to levy upon the property of the defendant(s) and to sell his interest therein;

(2) You are also directed to attach the property of the defendant(s) not levied upon in the possession of FIRST COMMONWEALTH BANK as Garnishee, and to notify garnishee that

(a) an attachment has issued;

(b) the garnishee is enjoined from paying any debt to or for the account of the defendant and from delivering any property of the defendant or otherwise disposing thereof;

(3) If property of the defendant not levied upon and subject to attachment is found in the possession of anyone other than a named garnishee, you are directed to notify him that he has been added as a garnishee and is enjoined as above stated.

Amount due	\$2,752.69
Interest from February 04, 2008	
At 6.00 % per annum	\$169.29
(Costs to be added)	\$

132.00 Prothonotary costs

Seal
BY 2/23/09

Prothonotary

Bill L. Chan
B.L.C.

Received this writ this 23 day
of FEB A.D. 2009
At 3:00 A.M./P.M.

Sheriff

Chesler A. Hanley
by Marilyn Hanley

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK

Plaintiff) NO. 07-1851-CD

v.

GAYLENE BROWN

Defendant(s)

FIRST COMMONWEALTH BANK

Garnishee

WRIT OF EXECUTION

Filed on behalf of:
TARGET NATIONAL BANK

Counsel of Record for This Party:

Gregg L. Morris, Esquire
Pa I.D. #69006

Patenaude & Felix, A.P.C.
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK

Plaintiff

) NO. 07-1851-CD

v.

GAYLENE BROWN

Defendant(s)

FIRST COMMONWEALTH BANK

Garnishee

WRIT OF EXECUTION

To the Sheriff of Clearfield County:

To satisfy the judgment, interest and costs against GAYLENE BROWN, Defendant(s),

(1) You are directed to levy upon the property of the defendant(s) and to sell his interest therein;

(2) You are also directed to attach the property of the defendant(s) not levied upon in the possession of FIRST COMMONWEALTH BANK as Garnishee, and to notify garnishee that

(a) an attachment has issued;

(b) the garnishee is enjoined from paying any debt to or for the account of the defendant and from delivering any property of the defendant or otherwise disposing thereof;

(3) If property of the defendant not lived upon and subject to attachment is found in the possession of anyone other than a named garnishee, you are directed to notify him that he has been added as a garnishee and is enjoined as above stated.

Amount due	\$2,752.69
Interest from February 04, 2008	
At 6.00 % per annum	\$169.29
(Costs to be added)	\$

132.00 Prothonotary costs

Seal
BY 2/23/09

Bill L. Hay
Prothonotary

Received this writ this 23 day
of Feb A.D. 2009
At 5:00 A.M. (P.M.)

Chuter A. Hawley
Sheriff *Sgt. Marilyn Harris*

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK)

Plaintiff)

) NO. 07-1851-CD

v.)

GAYLENE BROWN)

Defendant(s))

FILED No CC.
m/145Ln
MAR - 9 2009

FIRST COMMONWEALTH BANK)

Garnishee)

William A. Shaw
Prothonotary/Clerk of Courts

**PRAECIPE TO
DISCONTINUE WITHOUT
PREJUDICE AS TO
GARNISHEE ONLY**

Filed on behalf of:
TARGET NATIONAL BANK

Counsel of Record for This Party:

Gregg L. Morris, Esquire
Pa I.D. #69006

Patenaude & Felix, A.P.C.
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK)

Plaintiff) NO. 07-1851-CD

v.)

GAYLENE BROWN)

Defendant(s))

FIRST COMMONWEALTH BANK)

Garnishee)

PRAECIPE TO DISCONTINUE WITHOUT PREJUDICE AS TO GARNISHEE ONLY

TO: Prothonotary

Please discontinue the matter captioned above without prejudice as to Garnishee only.

Thank you.

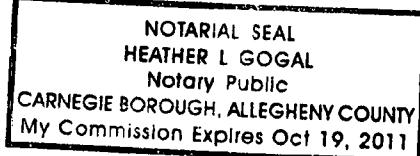
Respectfully submitted:
Patenaude & Felix, A.P.C.

Date: March 05, 2009

Gregg L. Morris, Esquire
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

Sworn to and subscribed before me this
5th day of March, 20 08.

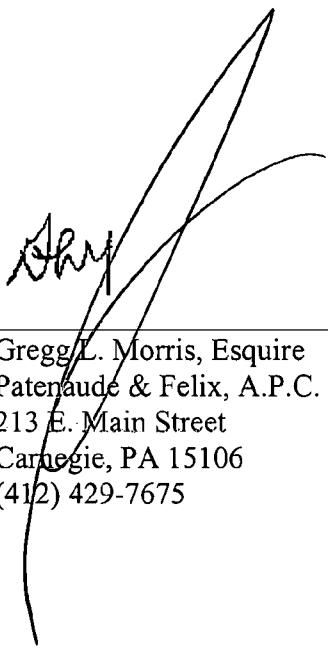
Heather L. Gogal
Notary Public



I, GREGG MORRIS, attorney for Plaintiff, TARGET NATIONAL BANK , hereby certify that a true and correct copy of foregoing document was served this date by ordinary mail upon the following:

FIRST COMMONWEALTH
PHILADELPHIA AND 6TH ST
PO BOX 400
INDIANA, PA 15701

Date: March 05, 2009



Gregg L. Morris, Esquire
Paterno & Felix, A.P.C.
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Carnegie, PA 15106
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