

08-249-CD
Palisades Coll. Vs Harold W. Hand

**COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA**

PALISADES COLLECTION L.L.C. ASSIGNEE OF
CHASE

No. 08-249-CD

C/O WOLPOFF & ABRAMSON, L.L.P.
4660 TRINDLE ROAD, 3rd FLOOR
CAMP HILL, PA 17011

Plaintiff

Type of Case: Contract

VS.

HAROLD W HAND
1775 VIADUCK RD
ROCKTON PA 15856

Type of Pleading:

Filed on Behalf of: Plaintiff

Defendant(s)

Date: 1/11/08


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
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

3/12/4764 Atty pd. 95.00
ICC Atty
ICC Sheriff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION L.L.C. :
ASSIGNEE OF CHASE : No.
Plaintiff :
vs : CIVIL ACTION - LAW
HAROLD W HAND :
Defendant(s) :
:

NOTICE

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 or any other claim or relief requested by the Plaintiff. You may lose money or property rights important to you.

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

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Clearfield County Courthouse
David S. Meholick, Court Administrator 230 East Market Street
Clearfield, PA 16830
814-765-2641

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION L.L.C.	:	
ASSIGNEE OF CHASE	:	No.
Plaintiff	:	
vs	:	
HAROLD W HAND	:	CIVIL ACTION - LAW
Defendant(s)	:	

NOTICIA

USTED HA SIDO DEMANDADO/A EN LA CORTE. Si usted desea defender conta la demanda puestas en las siguientes paginas, usted tienen que tomar acción dentro veinte (20) dias después que esta Demanda y Aviso es servido, con entrando por escrito una apariencia personalmente o por un abogado y archivando por escrito con la Corte sus defensas o objeciones a las demandas puestas en esta contra usted. Usted es advertido que si falla de hacerlo el caso puede proceder sin usted y un juzgamiento puede ser entrado conta usted por la Corte sin mas aviso por cualquier dinero reclamado en la Demanda o por cualquier otro reclamo o alivio solicitado por Demandante. Usted puede perder dinero o propiedad o otros derechos importante para usted.

USTED DEBE LLEVAR ESTE PAPEL A SU ABOGADO ENSEGUIDA. SI USTED NO TIENE UN ABOGADO, VAYA O LLAME POR TELEFONO LA OFICINA FIJADA AQUI ABAJO. ESTA OFICINA PUEDE PROVEERE CON INFORMACION DE COMO CONSEGUIR UN ABOGADO.

SI USTED NO PUEDE PAGARLE A UN ABOGADO, ESTA OFICINA PUEDE PROVEERE INFORMACION ACERCA AGENCIAS. QUE PUEDAN OFRECER SERVICIOS LEGAL A PERSONAS ELIGIBLE AQ UN HONORARIO REDUCIDO O GRATIS.

Clearfield County Courthouse
David S. Meholick, Court Administrator 230 East Market Street
Clearfield, PA 16830
814-765-2641

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION L.L.C.	:	
ASSIGNEE OF CHASE	:	No.
Plaintiff	:	
vs	:	
HAROLD W HAND	:	CIVIL ACTION - LAW
Defendant(s)	:	

COMPLAINT

AND NOW, comes the Plaintiff, by and through its attorneys and the law firm of Wolpoff & Abramson, LLP, and files this Complaint and in support avers as follows:

1. Plaintiff is PALISADES COLLECTION L.L.C. ASSIGNEE OF CHASE , located at 210 Sylvan Avenue Englewood Cliffs, NJ 07632.
2. Defendant, HAROLD W HAND, is an adult individual with a last known address of 1775 Viaduck Rd Rockton, Clearfield County, PA 15856.
3. It is averred that Defendant was issued an open end credit account (hereinafter "Account").

4. At all relevant times material hereto, Defendant has been a regular user of said Account for the purchase of products, goods and/or for obtaining services.

5. Defendant was provided with copies of the Statement of Accounts showing all debits and credits for transactions on the aforementioned credit card account to which there was no bona fide objection by Defendant. A true and correct copy of the Statement of Account is attached hereto, incorporated herein and marked as Exhibit "A".

6. Defendant did not object to the above-mentioned statements submitted by Plaintiff and/or its assignors to Defendant.

7. As of the date of this Complaint, the remaining balance due, owing and unpaid on Defendant's credit card account as a result of the charges made by said Defendant and/or any authorized users is the sum of \$8,776.28.

8. Interest has accrued from the charge off date at a rate of 6 %.

9. As of the date of the filing of this Complaint, the amount of interest which has accrued is the sum of \$1,500.36.

10. Despite reasonable and repeated demands for payment, Defendant has refused and continues to refuse to pay all sums due and owing on the aforementioned account balance, all to the damage and detriment of the Plaintiff.

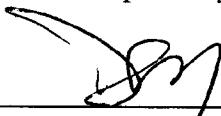
11. Plaintiff performed any and all conditions precedent to the bringing of this action.

12. The amount in controversy is within the jurisdictional amount requiring compulsory arbitration.

WHEREFORE, Plaintiff respectfully requests this Honorable Court enter Judgment in favor of the Plaintiff and against Defendant in the amount of \$8,776.28, plus interest in the amount of \$1,500.36, plus costs of this action and any other relief as this Court deems just and reasonable.

Respectfully Submitted,

Date: 1/11/08

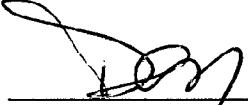

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Wolpoff & Abramson, L.L.P.
Attorneys in the Practice of Debt Collection
4660 Trindle Road, Suite 300
Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

VERIFICATION

The undersigned hereby states that they are the attorney for the Plaintiff who is located outside of this jurisdiction and in order to file the within document in an expedient and timely manner, they are authorized to take this verification on behalf of said Plaintiff in the within action and verifies that the statements made in the foregoing Pleading are true and correct to the best of their knowledge, information, and belief, based upon information provided by the Plaintiff.

The undersigned understands that false statements herein are made subject to the penalties of 18 Pa.C.S. Section 4904, relating to unsworn falsification to authorities.

Date: 1/11/18



Amy F. Doyle #87062 / Daniel F. Wolfson #20617
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Attorneys in the Practice of Debt Collection
4660 Trindle Road, Suite 300
Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

Exhibit "A"

••FICHINFO1 •• Date 07/19/07 Account 5435051500066490
PLAINTIFF = 612237
ACCOUNT NUMBER = 5435051500066490
POOL ID = CHASMP
CURRENT BALANCE = 8776.28
LSTPYMTDT = 20040729
CO DATE = 20050228
DEBTOR #1 LAST NAME = HAND
DEBTOR #1 FIRST NAME = HAROLD W
DEBTOR #1 MIDDLE NAM =
DEBTOR #1 ADDR 1 = PO BOX 244
DEBTOR #1 ADDR 2 =
DEBTOR #1 CITY = ROCKTON
DEBTOR #1 STATE = PA
DEBTOR #1 ZIP = 15856
DEBTOR #1 HOMEPHONE = 8145837621
DEBTOR #1 WORKPHONE =
DEBTOR #1 SOCSEC = XXX-XX-2530
DEBTOR #1 DOB =
DEBTOR #2 LAST NAME =
DEBTOR #2 FIRST NAME =
DEBTOR #2 MIDDLE NAM =
DEBTOR #2 ADDR 1 =

Mode L ••Nxt + •

••FICHINFO1 •• Date 07/19/07 Account 5435051500066490 Mode L ••Nxt + •
DEBTOR #2 ADDR 2 =
DEBTOR #2 CITY =
DEBTOR #2 STATE =
DEBTOR #2 ZIP =
DEBTOR #2 HOMEPHONE =
DEBTOR #2 WORKPHONE =
DEBTOR #2 SOCSEC =
DEBTOR#2 DOB =
DEBTOR = 4145266
= 20020605
=

•MODE L=LFT R=RGT W=WRP Next File •

•MODE L=LFT R=RGT W=WRP Next File •

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103755
NO: 08-249-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: PALISADES COLLECTION LLC, Assignee
vs.
DEFENDANT: HAROLD W. HAND

SHERIFF RETURN

NOW, March 12, 2008 AT 2:30 PM SERVED THE WITHIN COMPLAINT ON HAROLD W. HAND DEFENDANT AT 1775 VIADUCK RD, ROCKTON, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO HAROLD HAND, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: NEVLING / COUDRIET

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	WOLPOFF	00261304	10.00
SHERIFF HAWKINS	WOLPOFF	00261304	44.26

0/3:00 cm
JUN 20 2008

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

____ Day of _____ 2008

So Answers,

Chester A. Hawkins
by Marilyn Hand
Chester A. Hawkins
Sheriff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION L.L.C.
ASSIGNEE OF CHASE

Plaintiff No. 08-249-CD

VS CIVIL ACTION - LAW

HAROLD W HAND
Defendant(s)

PRAECIPE FOR JUDGMENT

Please enter Judgment in favor of Plaintiff and against Defendant(s), HAROLD W HAND , for failure to answer the Complaint.

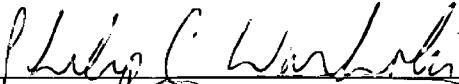
(X)	Amount due	\$10,276.64
	TOTAL	\$10,276.64, plus interest and costs

(X) I certify that the foregoing assessment of damages is for specified amounts alleged to be due in the complaint and is calculable as a sum certain from the complaint.

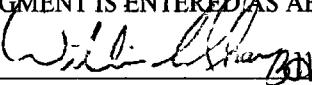
(X) Pursuant to Pa.R.C.P. 237 (Notice of Praeclipe for final judgment or decree), I certify that a copy of this praecipe has been mailed to each other party who has appeared in the action or to his/her Attorney of Record.

(X) 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.

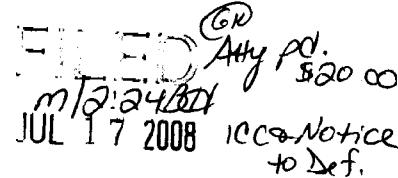
Date: 7/9/08


Amy F. Doyle #87062 / Philip C. Warholic #86341 /
David R. Galloway #87326 / Sarah E. Ehasz #86469 /
Robert N. Polas, Jr. #201259
Mann Bracken LLC
The Successor by Merger to Wolpoff & Abramson, L.L.P.
and Eskanos & Adler, P.C.
4660 Trindle Road, Suite 300, Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

NOW, July 17, 2008, JUDGMENT IS ENTERED AS ABOVE.


Prothonotary/Clerk, Civil Division

By: _____
Deputy


176249269 Atty pd. \$20.00
JUL 17 2008 ICC Notice to Def.

William A. Shaw
Prothonotary/Clerk of Courts ICC Statement
to Atty

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION L.L.C.

ASSIGNEE OF CHASE

Plaintiff

No. 08-249-CD

vs.

CIVIL ACTION - LAW

HAROLD W HAND

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, Harold W Hand, above-named, is over 21 years of age; is last known to reside at 1775 Viaduck Rd, Rockton, 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: 7/4/08

Philip C. Warholic

Amy F. Doyle #87062 / Philip C. Warholic #86341 /

David R. Galloway #87326 / Sarah E. Ehasz #86469 /

Robert N. Polas, Jr. #201259

Mann Bracken LLC

The Successor by Merger to Wolpoff & Abramson, L.L.P.
and Eskanos & Adler, P.C.

4660 Trindle Road, Suite 300, Camp Hill, PA

Telephone: (717) 303-6700

Counsel for Plaintiff

SWORN and SUBSCRIBED to before me this 9th day of July, 2008.

Elana Ortiz
Notary Public

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION L.L.C.
ASSIGNEE OF CHASE
Plaintiff

No. 08-249-CD

vs.

CIVIL ACTION - LAW

HAROLD W HAND
Defendant(s)

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

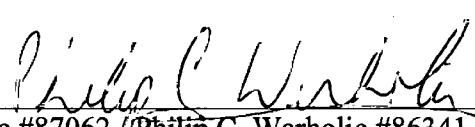
I hereby certify that the precise address of Plaintiff is:

Palisades Collection L.L.C.
210 Sylvan Avenue
Englewood Cliffs NJ 07632

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

Harold W Hand
1775 Viaduck Rd
Rockton PA 15856

Date: 7/9/08



Amy F. Doyle #87062 / Philip C. Warholic #86341 /
David R. Galloway #87326 / Sarah E. Ehasz #86469 /
Robert N. Polas, Jr. #201259
Mann Bracken LLC
The Successor by Merger to Wolpoff & Abramson, L.L.P.
and Eskanos & Adler, P.C.
4660 Trindle Road, Suite 300, Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

MAIN OFFICE
TWO IRVINGTON CENTRE
102 KING FARM BLVD., ROCKVILLE, MD 20850

REGIONAL OFFICES
0605 JUDICIAL DR., BLDG. A-5, FAIRFAX, VA 22030
7 WEST CARY STREET, RICHMOND, VA 23220
122 GREENWICH RD., VIRGINIA BEACH, VA 23462
119 N. MARKET ST., STE. 1300, WILMINGTON, DE 19899
VALLEYBANK BLDG., BOX 1226, CLARKSBURG, WV 26302
660 TRINDEL ROAD, 3RD FLOOR, CAMP HILL, PA 17011
101 GRANT ST., STE. 4300, PITTSBURGH, PA 15219
8632 ROADSIDE DR., STE. 265, AGOURA HILLS, CA 91301
19500 HIGH POINTE BLVD., STE. 250, NOVI, MI 48375
100 CANAL VIEW BLVD., ROCHESTER, NY 14623
215 N. O'CONNOR BLVD., STE. 1060, IRVING, TX 75039
1200 SOUTHWEST FREEWAY, STE. 3300, HOUSTON, TX 77027
11 SOLEDAD ST., STE. 300, SAN ANTONIO, TX 78205
201 PEACHTREE STREET, STE. 1717, ATLANTA, GA 30361
101 CARLSON PKWY., STE. 303, MINNETONKA, MN 55301
1643 S. ULSTER ST., STE. 800, DENVER, CO 80237
355 TOWN CENTER RD, STE. 1002, BOCA RATON, FL 33486

WOLPOFF & ABRAMSON, L.L.P.

Attorneys in the Practice of Debt Collection
(A National Collection Attorney Network Firm)

4660 TRINDEL ROAD
SUITE 300
CAMP HILL, PA 17011

(TOLL FREE)
(800) 830-2793

FACSIMILE (866) 281-9028

PLEASE DIRECT ALL INQUIRIES TO THE CAMP HILL OFFICE

June 23, 2008

HAROLD W HAND
1775 VIADUCK RD
ROCKTON, PA 15856

AFFILIATED FIRM LOCATIONS (NOT REGIONAL OFFICES OF WOLPOFF & ABRAMSON, L.L.P.)

BIRMINGHAM, ALABAMA
ANCHORAGE, ALASKA
PHOENIX, ARIZONA
LITTLE ROCK, ARKANSAS
EAST HARTFORD, CONNECTICUT
HONOLULU, HAWAII
BOISE, IDAHO
CHICAGO, ILLINOIS
MERRILLVILLE, INDIANA
KANSAS CITY, KANSAS
LEXINGTON, KENTUCKY
METAIRIE, LOUISIANA
WORCESTER, MASSACHUSETTS
ST. LOUIS, MISSOURI
GREAT FALLS, MONTANA
OMAHA, NEBRASKA
LAS VEGAS, NEVADA
MANCHESTER, NEW HAMPSHIRE
CEDAR KNOLLS, NEW JERSEY
RALEIGH, NORTH CAROLINA

FARGO, NORTH DAKOTA
CLEVELAND, OHIO
OKLAHOMA CITY, OKLAHOMA
EUGENE, OREGON
PROVIDENCE, RHODE ISLAND
COLUMBIA, SOUTH CAROLINA
KNOXVILLE, TENNESSEE
SANDY, UTAH
MILWAUKEE, WISCONSIN
RAWLINS, WYOMING
SEATTLE, WASHINGTON

* The National Collection
Attorney Network is an
affiliation of separate law firm.

W&A Hours of Operation:
8 a.m. - 6 p.m. M-F

File No. 176249269

**RE: PALISADES COLLECTION L.L.C. ASSIGNEE OF CHASE
vs. HAROLD W HAND**

Dear Harold W Hand:

Enclosed herein please find a 10-Day Notice pursuant to Rule 237.1 of the Pennsylvania Rules of Civil Procedure.

Sincerely,



Amy F. Doyle #87062 / Philip C. Warholic #86341 /
David R. Galloway #87326 / Sarah E. Ehasz #86469 /

Robert N. Polas, Jr. #201259

Wolpoff & Abramson, L.L.P.
Attorneys in the Practice of Debt Collection
4660 Trindle Road, Wolpoff & Abramson, L.L.P.
Camp Hill, PA 17011
Telephone: (800) 830-2793
Counsel for Plaintiff

Enclosure

cc:



This is an attempt by a debt collector to collect a debt and any information obtained will
be used for that purpose

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION L.L.C.
ASSIGNEE OF CHASE

NO. 08-249-CD

Plaintiff

vs.

CIVIL ACTION - LAW

HAROLD W HAND

Defendant(s)

TO: HAROLD W HAND
1775 VIADUCK RD
ROCKTON PA 15856

DATE OF NOTICE: June 23, 2008

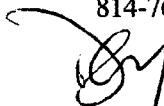
IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS.

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

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

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


Amy E. Doyle #87062 / Philip C. Warholic #86341 /
David R. Galloway #87326 / Sarah E. Ehasz #86469 /
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Telephone: (717) 303-6700
Counsel for Plaintiff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION L.L.C.

ASSIGNEE OF CHASE

Plaintiff

No. 08-249-CD

vs.

CIVIL ACTION - LAW

HAROLD W HAND

Defendant(s)

NOTICE OF JUDGMENT

(x) Notice is hereby given that a Judgment in the above-captioned matter has been entered against you in the amount of \$10,276.64, plus interest, on July 17, 2008.

(x) A copy of all documents filed with the Prothonotary in support of the within judgment is/are attached.

By: Philip C. Warholic

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

Date: 7/9/08

Philip C. Warholic
Amy F. Doyle #87062 / Philip C. Warholic #86341 /
David R. Galloway #87326 / Sarah E. Ehasz #86469 /
Robert N. Polas, Jr. #201259
Mann Bracken LLC
The Successor by Merger to Wolpoff & Abramson, L.L.P.
and Eskanos & Adler, P.C.
4660 Trindle Road, Suite 300, Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

This Notice is given in accordance with Pa.R.C.P. 236.)

NOTICE SENT TO: Harold W Hand
1775 Viaduck Rd
Rockton PA 15856

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

Palisades Collection, L.L.C.

Chase

Plaintiff(s)

No.: 2008-00249-CD

Real Debt: \$10,276.64

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Harold W. Hand

Defendant(s)

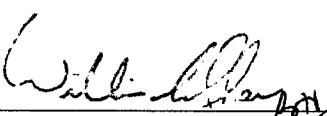
Entry: \$20.00

Instrument: Default Judgment

Date of Entry: July 17, 2008

Expires: July 17, 2013

Certified from the record this 17th day of July, 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