

08-459-CD

Portfolio Rec. vs Jamie Leonard

136861  
COURT OF COMMON PLEAS OF CLEARFIELD COUNTY  
PENNSYLVANIA

Portfolio Recovery Assoc LLC  
(Plaintiff) CIVIL ACTION

c/o 2417 Welsh Road Suite 21 #520

(Street Address)

Phila., PA 19114

(City, State ZIP)

No. 08-459-CD

Type of Case: CIVIL

Type of Pleading: COMPLAINT

VS.

JAIME LEONARD  
(Defendant)

45 HARPER RD

(Street Address)

DUBOIS PA 15801

(City, State ZIP)

Filed on Behalf of:

Portfolio Recovery Assoc LLC  
(Plaintiff/Defendant)

David J. Apothaker, Esquire

(Filed by)

2417. Welsh Road Suite 21 #520

(Address) Phila., PA 19114

215-634-8920

(Phone)

(Signature)

FILED

MAR 14 2008

William A. Shaw  
Prothonotary/Clerk of Courts

Atty pd.  
95.00

ICC Sheriff

ICC Atty

Our File No.: 136861  
APOTHAKE & ASSOCIATES, P.C.  
BY: David J. Apothaker, Esq.  
Attorney I.D.#38423  
2417 Welsh Road, Suite 21 #520  
Philadelphia, PA 19114  
(215) 634-8920  
Attorneys for Plaintiff

PORTFOLIO RECOVERY	)	COURT OF COMMON PLEAS
ASSOCIATES, LLC	)	CLEARFIELD COUNTY
c/o Apothaker & Associates, P.C.	)	
2417 Welsh Road, Suite 21 #520	)	NO.:
Philadelphia, PA 19114	)	
Plaintiff,	)	
vs.	)	
	)	
JAIME LEONARD	)	
45 HARPER RD	)	
DU BOIS, PA 15801-7409	)	
Defendant.	)	

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

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

CLEARFIELD COUNTY BAR ASSOCIATION  
Lawyer Referral and Information Service  
814-765-2641

#### **AVISO**

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o con un abogado y entregar a la corte en forma escrita sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del edemandante y requiere que usted compla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO. VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

CLEARFIELD COUNTY BAR ASSOCIATION  
Lawyer Referral and Information Service  
814-765-2641

APOTHAKE & ASSOCIATES, P.C.  
BY: David J. Apothaker, Esq.  
Attorney I.D.#38423  
2417 Welsh Road, Suite 21 #520  
Philadelphia, PA 19114  
(215) 634-8920  
Attorneys for Plaintiff

PORTFOLIO RECOVERY	)	COURT OF COMMON PLEAS
ASSOCIATES, LLC	)	CLEARFIELD COUNTY
c/o Apothaker & Associates, P.C.	)	
2417 Welsh Road, Suite 21 #520	)	NO.:
Philadelphia, PA 19114	)	
Plaintiff,	)	
vs.	)	
	)	
JAIME LEONARD	)	
45 HARPER RD	)	
DU BOIS, PA 15801-7409	)	
Defendant.	)	

CIVIL ACTION COMPLAINT  
FIRST COUNT

1. Plaintiff, PORTFOLIO RECOVERY ASSOCIATES, LLC, is a company with its principal place of business located at c/o Apothaker & Associates, P.C., 2417 Welsh Road, Suite 21 #520, Philadelphia, PA 19114.
2. Defendant is JAIME LEONARD, an adult individual residing at 45 HARPER RD DU BOIS, PA 15801-7409.
3. At the special instance and request of Defendant, Plaintiff sold and delivered to Defendant goods and/or services at the times, of the kinds, in the quantities, and for the prices set forth in Plaintiff's records. A true and correct copy of which is attached hereto, incorporated herein by reference and designated Exhibit "A".
4. Defendant received and accepted the goods and/or services described in Exhibit "A".
5. The prices set forth in Exhibit "A" are the fair, reasonable and market prices for said goods and/or services, and the prices which Defendant agreed to pay.
6. All credits, if any, to which Defendant is entitled, are set forth in Exhibit "A".
7. In addition, Plaintiff avers that Defendant has failed and continues to fail to make any payments, leaving a balance due and owing of \$3,241.31.

8. Although demand has been made, Defendant has failed to make payment of the amount due as above.

9. The original creditor is HSBC.

WHEREFORE, Plaintiff demands judgment in favor of Plaintiff and against Defendant(s) for the sum of \$3,241.31 and requests this Court award Plaintiff attorney's fees and costs to the extent permitted by applicable law.

APOTHAKE & ASSOCIATES, P.C.  
Attorney for Plaintiff  
A Law Firm Engaged in Debt Collection

BY: \_\_\_\_\_

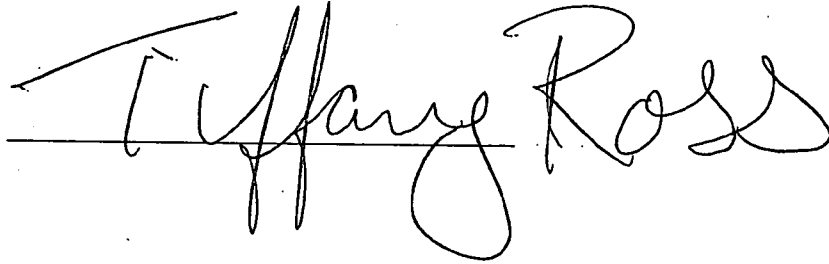
David J. Apothaker

Dated: 1/2/2008

Our File No.: 136861

**VERIFICATION**

TIFFANY ROSS hereby states that I am counsel for plaintiff in this action, and that I am authorized to take this Verification, and that the statements made in the foregoing Civil Action Complaint are true and correct to the best of my knowledge, information, and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 Pa.C.S.A. 4904 relating to unsworn falsification to authorities.

A handwritten signature in cursive script, reading "Tiffany Ross", written over a horizontal line.

DATE:

PORTFOLIO RECOVERY ASSOCIATES, LLC  
c/o Apothaker & Associates, P.C.  
2417 Welsh Road, Suite 21 #520  
Philadelphia, PA 19114

JAIME LEONARD  
45 HARPER RD  
DU BOIS, PA 15801-7409

STATEMENT OF ACCOUNT

Debtor's Name:	JAIME LEONARD
Account Number:	5408010014697177
Original Creditor:	HSBC
Balance Due:	\$3,241.31

Our File No.: 136861

EXHIBIT "A"

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103894  
NO: 08-459-CD  
SERVICE # 1 OF 1  
COMPLAINT

PLAINTIFF: PORTFOLIO RECOVERY ASSOC. LLC  
vs.  
DEFENDANT: JAIME LEONARD

SHERIFF RETURN

NOW, April 07, 2008 AT 10:20 AM SERVED THE WITHIN COMPLAINT ON JAIME LEONARD DEFENDANT AT 45 HARPER RD, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO JAIME LEONARD, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: NEVLING /

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	APOTHAKE	80511	10.00
SHERIFF HAWKINS	APOTHAKE	80511	56.38

FILED  
0/2:20cm  
JUL 07 2008

William A. Shaw  
Prothonotary/Clerk of Courts

Sworn to Before Me This

\_\_\_\_\_ Day of \_\_\_\_\_ 2008

So Answers,

*Chester A. Hawkins*  
by *Marilyn Harris*  
Chester A. Hawkins  
Sheriff

Our File No.: 136861  
APOTHAKER & ASSOCIATES, P.C.  
BY: David J. Apothaker  
Attorney I.D.# 38423  
520 Fellowship Road C306  
Mount Laurel, NJ 08054  
(800) 672-0215  
Attorney for Plaintiff

PORTFOLIO RECOVERY  
ASSOCIATES, LLC

Plaintiff,

vs.

JAIME LEONARD

Defendant.

) COURT OF COMMON PLEAS OF  
) CLEARFIELD COUNTY  
)  
)

) NO.: 08-459-CD  
)  
)

) Civil Action  
)  
)

**PRAECIPE TO ENTER DEFAULT JUDGMENT**

TO THE PROTHONOTARY:

Please enter a default judgment in favor of plaintiff, PORTFOLIO RECOVERY ASSOCIATES, LLC, and against Defendant, JAIME LEONARD, for failure to answer or otherwise respond to the Complaint - Civil Action.

The Complaint was served upon the defendants on April 07, 2008 by the CLEARFIELD Sheriff's Department. Copies of the proofs of service are attached hereto as Exhibit "A".

I certify, a copy of the Notice of Intention To Take Default was mailed on July 25, 2008, and also attached hereto.

**FILED** *Atty paid 20.00*  
*in 10:07 a.m. 6/12*  
**FEB 20 2009** *icc + Statement Atty*  
*icc + Notice Def.*  
William A. Shaw  
Prothonotary/Clerk of Courts *(610)*

**OFFICE OF THE PROTHONOTARY  
COURT OF COMMON PLEAS**

TO: JAIME LEONARD  
45 HARPER RD  
DU BOIS, PA 15801-7409

PORTFOLIO RECOVERY  
ASSOCIATES, LLC

Plaintiff,

vs.

JAIME LEONARD

Defendant.

) COURT OF COMMON PLEAS OF  
) CLEARFIELD COUNTY  
)

) NO.: 08-459-CD  
)

) Civil Action  
)

---

**NOTICE**

Pursuant to Rule 236 of the Supreme Court of Pennsylvania, you are hereby notified that a Judgment has been entered against you in the above proceeding as indicated below.

XX JUDGMENT BY DEFAULT

\_\_\_ JUDGMENT IN REPLEVIN

\_\_\_ JUDGMENT BY CONFESSION

\_\_\_ JUDGMENT FOR POSSESSION

\_\_\_ JUDGMENT ON AWARD OF  
ARBITRATORS

\_\_\_ JUDGMENT ON VERDICT

\_\_\_ JUDGMENT ON COURT FINDINGS

\_\_\_ JUDGMENT ON WRIT OF REVIVAL

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE, PLEASE CALL:

ATTORNEY David J. Apothaker, Esq. at this telephone number: 215-634-8920

Our File No.: 136861  
APOTHAKER & ASSOCIATES, P.C.  
BY: David J. Apothaker  
Attorney I.D.# 38423  
520 Fellowship Road C306  
Mount Laurel, NJ 08054  
(800) 672-0215  
Attorney for Plaintiff

PORTFOLIO RECOVERY	)	COURT OF COMMON PLEAS OF
ASSOCIATES, LLC	)	CLEARFIELD COUNTY
	)	
Plaintiff,	)	
vs.	)	NO.: 08-459-CD
	)	
JAIME LEONARD	)	Civil Action
	)	
Defendant.	)	

**AFFIDAVIT OF NON-MILITARY SERVICE**

COMMONWEALTH OF PENNSYLVANIA :  
: SS.  
COUNTY OF CLEARFIELD :

David J. Apothaker, being duly sworn according to law, deposes and says that I am the attorney for Plaintiff, and authorized to make this affidavit; that Defendant(s) resides at 45 HARPER RD DU BOIS, PA 15801-7409.

We inquired with the web site of the Defense Manpower Data Center, located at 1600 Wilson Boulevard, Suite 400, Arlington, VA 22209-2593, if the Defendant(s) is/are in any branch of the military.

Mary M. Snavely-Dixon, Director of the Defense Manpower Data Center has sent back our inquiry indicated that the Defendant(s) is/are not in the military.

\_\_\_\_\_  
David J. Apothaker  
Attorney for Plaintiff

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

Department of Defense Manpower Data Center

FEB-10-2009 09:44:54



Military Status Report  
Pursuant to the Servicemembers Civil Relief Act

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

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

*Mary M. Snavelly-Dixon*

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

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

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

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

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

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

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

**OFFICE OF THE PROTHONOTARY  
COURT OF COMMON PLEAS  
CLEARFIELD COUNTY**

PORTFOLIO RECOVERY ASSOCIATES, LLC	)	COURT OF COMMON PLEAS
	)	CLEARFIELD COUNTY
vs.	)	
	)	
JAIME LEONARD	)	NO. 08-459-CD
	)	

To: JAIME LEONARD  
45 HARPER RD  
DU BOIS, PA 15801-7409

**NOTICE, RULE 237.5  
NOTICE OF PRAECIPE TO ENTER JUDGMENT BY DEFAULT**

Date of Notice: July 25, 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.

COURT ADMINISTRATOR  
CLEARFIELD COUNTY COURTHOUSE  
SECOND & MARKET STREETS  
CLEARFIELD, PA 16830  
814-765-2641

\_\_\_\_\_  
/s/ David J. Apothaker  
DAVID J. APOTHAKE, ESQUIRE  
APOTHAKE & ASSOCIATES, PC  
A Law Firm Engaged in Debt Collection  
2417 Welsh Road, Suite 21 #520  
Philadelphia, PA 19114  
(215) 634-8920  
Attorney for Plaintiff  
Attorney ID #38423

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103894  
NO: 08-459-CD  
SERVICE # 1 OF 1  
COMPLAINT

COPY

PLAINTIFF: PORTFOLIO RECOVERY ASSOC. LLC  
VS.  
DEFENDANT: JAIME LEONARD

SHERIFF RETURN

NOW, April 07, 2008 AT 10:20 AM SERVED THE WITHIN COMPLAINT ON JAIME LEONARD DEFENDANT AT 45 HARPER RD, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO JAIME LEONARD, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: NEVLING /

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	APOTHAKE	80511	10.00
SHERIFF HAWKINS	APOTHAKE	80511	56.38

Sworn to Before Me This

\_\_\_\_ Day of \_\_\_\_\_ 2008

So Answers,



Chester A. Hawkins  
Sheriff

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

Portfolio Recovery Associates, LLC  
Plaintiff(s)

No.: 2008-00459-CD

Real Debt: \$3,602.40

Atty's Comm: \$

Costs: \$

Int. From: \$

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: February 20, 2009

Expires: February 20, 2014

Vs.

Jaime Leonard  
Defendant(s)

COPY

Certified from the record this 20<sup>th</sup> day of February, 2009.



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

Our File No.: 136861

**PRAECIPE FOR WRIT OF EXECUTION – (MONEY JUDGMENTS)  
P.R.C.P. 3101 to 3149**

PORTFOLIO RECOVERY ASSOCIATES,  
LLC

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

vs.

JAIME LEONARD

NO.: 08-459-CD

PRAECIPE FOR WRIT OF EXECUTION  
(MONEY JUDGMENT)

**FILED**  
m/j: 49301  
9 OCT 29 2012  
1cc  
Atty  
Cavallaro  
William A. Shaw  
Prothonotary/Clerk of Courts  
Atty pd.  
\$20.00  
2 cc to writs  
to Sheriff  
66

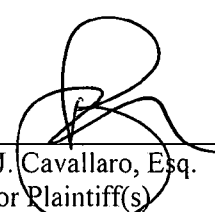
To the Director of the Prothonotary: ISSUE WRIT OF EXECUTION IN THE ABOVE MATTER.

- (1) Directed to the Sheriff of Clearfield County, PA;
- (2) against JAIME LEONARD, Defendant(s)
- (3) and against FIRST COMMONWEALTH BANK 14303 CLEARFIELD SHAWVILLE HIGHWAY  
CLEARFIELD, PA 16830, Garnishee(s)
- (4) and index this writ
  - (a) against \_\_\_\_\_ and \_\_\_\_\_
  - (b) against \_\_\_\_\_, Defendant(s) and \_\_\_\_\_

as a lis pendens against the real property of the defendant/s in the name of the Garnishee/s as follows: (Specifically described property)

Check Block/s as needed:

- ☐ Real Estate  
☒ Personal Property

  
Benjamin J. Cavallaro, Esq.  
Attorney for Plaintiff(s)

Amount Due	\$3602.40
Interest from February 20, 2009	\$790.55
Minus Payments made	\$
Total	\$4392.95 Plus costs
	<b>135.00 Prothonotary costs</b>

Under paragraph (1) when the writ is directed to the sheriff of another county as authorized by Rule 3103(b), the county should be indicated.

Under Rule 3103 (c) a writ issued on a transferred judgment may be directed only to the sheriff of the county in which issued.

Paragraph (3) above should be completed only if a named garnishee is to be included in the writ.

Paragraph (4) (a) should be completed only if indexing of the execution in the county of issuance, is desired as authorized by Rule 3104(a). When the writ issues to another county indexing is required as of course in that county by the Office of Prothonotary. See Rule 3104(b).

Paragraph (4) (b) should be completed only if real property in the name of a garnishee is attached and indexing as a lis pendens is desired, see Rule 3104(c).

Our File No.: 136861

PLAINTIFF PORTFOLIO RECOVERY ASSOCIATES, LLC VS. DEFENDANT JAIME LEONARD

NO. 08-459-CD

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

### 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 property to be set aside in kind): \_\_\_\_\_  
[ ] (II) paid in cash following the sale of the property levied upon; or
  - (b) I claim the following exemption (specify property and basis of exemption): \_\_\_\_\_
- (2) From my property which is in the possession of a third party, I claim the following exemptions:
  - (a) my \$300 statutory exemption: [ ] in cash; [ ] in kind  
(specify property): \_\_\_\_\_
  - (b) Social Security benefits on deposit in the amount of: \$ \_\_\_\_\_
  - (c) other (specify amount and basis of exemption): \_\_\_\_\_

I request a prompt court hearing to determine the exemption.

Notice of the hearing should be given to me at (Name, 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: \_\_\_\_\_

Phone #: \_\_\_\_\_

Address: \_\_\_\_\_

City, Zip: \_\_\_\_\_

**THIS CLAIM TO BE FILED WITH:** Office of the Sheriff of Clearfield County  
1 North Second Street  
Clearfield, PA 16830

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

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

Under paragraph (3) of the writ, the sheriff may, as under prior practice, add as a garnishee any person not named in this writ who may be found in possession of property of the defendant. See Rule 3111(a). For limitations on the power to attach tangible personal property, see Rule 3108(a).

(b) Each court shall by local rule designate the officer, organization or person to be named in the notice.

### **MAJOR EXEMPTION UNDER PENNSYLVANIA AND FEDERAL LAW**

- (1) \$300.00 statutory exemption
- (2) Bibles, school books, sewing machines, uniforms and equipment
- (3) Most wages and unemployment compensation
- (4) Social Security benefits
- (5) Certain retirement funds and accounts
- (6) Certain veteran and armed forces benefits
- (7) Certain insurance proceeds

NO. 08-459-CD

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

PORTFOLIO RECOVERY ASSOCIATES, LLC

VS.

JAIME LEONARD

WRIT OF EXECUTION  
(Money Judgments)

Claim	\$3602.40
Interest From February 20, 2009	\$790.55
Minus payments made	\$
<u>Costs</u>	
Dept. of Court Records	\$20.00
Sheriff Fee	\$200.00

Apothaker & Associates, P.C.  
Benjamin J. Cavallaro, Esquire  
520 Fellowship Road C306  
PO Box 5496  
Mount Laurel, NJ 08054  
(800) 672-0215  
ID # 307949

Our File No.: 136861

**IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA**  
**WRIT OF EXECUTION (MONEY JUDGMENTS)**  
**RULES P.R.C.P. 3252**

PORTFOLIO RECOVERY ASSOCIATES,  
LLC

NO.: 08-459-CD

Plaintiff

vs.

**WRIT OF EXECUTION**  
**(Money Judgment)**

JAIME LEONARD

Defendant(s)

**TO THE SHERIFF OF CLEARFIELD COUNTY, PA.**

To satisfy the judgment, interest and costs against: JAIME LEONARD, defendant(s):

(1) You are directed to attach the property of the defendant(s) not levied upon in the possession of

FIRST COMMONWEALTH BANK 14303 CLEARFIELD SHAWVILLE HIGHWAY CLEARFIELD, PA 16830  
as Garnishee(s)

And to notify the Garnishee(s) that

(a) an attachment has been issued:

(b) Except as provided in paragraph (c), the garnishee(s) is 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 (i) the first \$10,000 of each account of the defendant with a bank or other (i) financial institution containing any funds which 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.

(ii) each account of the defendant with a bank or other financial institution in which funds on deposit exceed \$10,000

at any time if all 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.

(iii) any funds in an account of the defendant with a bank or other financial institution that total \$300 or less. If multiple accounts are attached, a total of \$300 in all accounts shall not be subject to levy and attachment as determined by the executing officer. The funds shall be set aside pursuant to the defendant's general exemption provided in 42 Pa.C.S. § 8123.

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

Amount Due	\$3602.40
Interest from February 20, 2009	\$790.55
Minus Payments made	\$
Costs to be added	\$220.00
Total	\$4612.95

135.00 Prothonotary costs

Dated: 10/29/12

Prothonotary of Clearfield County

BY: \_\_\_\_\_

File No.: 136861

PORTFOLIO RECOVERY ASSOCIATES,  
LLC

Plaintiff

vs.

JAIME LEONARD  
45 HARPER RD  
DU BOIS, PA 15801-7409  
XXX-XX-6085

Defendant

FIRST COMMONWEALTH BANK

Garnishee

COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY

NO.: 08-459-CD

Civil Action

**FILED** NO  
MT 11:48 AM CC  
OCT 29 2012  
William A. Shaw  
Prothonotary/Clerk of Courts

### INTERROGATORIES TO GARNISHEE

TO: FIRST COMMONWEALTH BANK, Garnishee:


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.

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 defendant(s) any money or were liable to defendant(s) for any reason?
2. At the time you were served or at any subsequent time was there in your possession, custody, control or in the joint possession, custody or control of yourself and one or more persons any property of any nature owned solely or in part by the defendant(s)?
3. At the time you were served or any subsequent time did you hold legal title to any property of any nature owed solely or in part by the defendant(s) or in which the defendant held or claimed any interest?
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 any interest?
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 direction or consent and what was the consideration thereof?
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 the defendant's 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 any subsequent time did the defendant(s) 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 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(s) 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 exemption under 42PA.C.S. §8123? If so, identify each account.
9. How much is the value of any property in your possession belonging to the defendant(s)?
10. In the space below, the plaintiff may set forth additional appropriate interrogatories.

Dated: 10/17/12



---

Benjamin J. Cavallaro, Esquire  
APOTHAKE & ASSOCIATES, P.C.  
520 Fellowship Road C306  
PO Box 5496  
Mount Laurel, New Jersey 08054  
(856) 780-1000  
Attorneys for Plaintiff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

Dkt Pg. 110137

PORTFOLIO RECOVERY ASSOCIATES LLC

NO. 08-459-CD

VS

JAIME LEONARD  
TO: FIRST COMMONWEALTH BANK,  
Garnishee

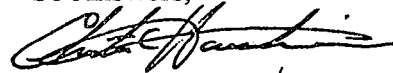
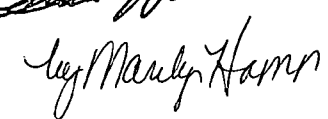
WRIT OF EXECUTION,  
INTERROGATORIES

**SHERIFF'S RETURN**

NOW February 12, 2013, RETURN THE WITHIN WRIT OF EXECUTION,  
INTERROGATORIES "NOT SERVED, TIME EXPIRED" AS TO JAIME LEONARD,  
DEFENDANT and FIRST COMMONWEALTH BANK, Garnishee. NEVER RECEIVED  
INSTRUCTIONS FROM ATTORNEY.

SHFF. HAWKINS: \$15.00  
SHFF. SURCHARGE: \$20.00  
PAID BY: ATTY

So Answers,

SWORN TO BEFORE ME THIS  
\_\_\_\_\_ DAY OF \_\_\_\_\_ 2013.

CHESTER A. HAWKINS  
SHERIFF

5  
**FILED**  
9:41 am  
FEB 13 2013  
William A. Shaw  
Prothonotary/Clerk of Courts

Our File No.: 136861

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
WRIT OF EXECUTION (MONEY JUDGMENTS)  
RULES P.R.C.P. 3252

PORTFOLIO RECOVERY ASSOCIATES,  
LLC

NO.: 08-459-CD

Plaintiff

vs.

WRIT OF EXECUTION  
(Money Judgment)

JAIME LEONARD

Defendant(s)

TO THE SHERIFF OF CLEARFIELD COUNTY, PA.

To satisfy the judgment, interest and costs against: JAIME LEONARD, defendant(s):

- (1) You are directed to attach the property of the defendant(s) not levied upon in the possession of

FIRST COMMONWEALTH BANK 14303 CLEARFIELD SHAWVILLE HIGHWAY CLEARFIELD, PA 16830  
as Garnishee(s)

And to notify the Garnishee(s) that

(a) an attachment has been issued;

(b) Except as provided in paragraph (c), the garnishee(s) is 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 (i) the first \$10,000 of each account of the defendant with a bank or other (i) financial institution containing any funds which 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.
- (ii) each account of the defendant with a bank or other financial institution in which funds on deposit exceed \$10,000 at any time if all 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.
- (iii) any funds in an account of the defendant with a bank or other financial institution that total \$300 or less. If multiple accounts are attached, a total of \$300 in all accounts shall not be subject to levy and attachment as determined by the executing officer. The funds shall be set aside pursuant to the defendant's general exemption provided in 42 Pa.C.S. § 8123.

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

Amount Due	\$3602.40
Interest from February 20, 2009	\$790.55
Minus Payments made	\$
Costs to be added	\$220.00
Total	\$4612.95

135.00 Prothonotary costs

Dated: 10/29/12  
Received this writ this 29<sup>th</sup> day  
of OCT A.D. 2012  
At 2:30 A.M. (P.M.)

Prothonotary of Clearfield County

BY:

Chester A. Hawley  
Sheriff by Mary Ann Harris

PORTFOLIO RECOVERY ASSOCIATES,  
LLC

Plaintiff

vs.

JAIME LEONARD  
45 HARPER RD  
DU BOIS, PA 15801-7409  
XXX-XX-6085

Defendant

COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY

NO.: 08-459-CD

Civil Action

FIRST COMMONWEALTH BANK

Garnishee

### INTERROGATORIES TO GARNISHEE

TO: FIRST COMMONWEALTH BANK, Garnishee:


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.

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 defendant(s) any money or were liable to defendant(s) for any reason?
2. At the time you were served or at any subsequent time was there in your possession, custody, control or in the joint possession, custody or control of yourself and one or more persons any property of any nature owned solely or in part by the defendant(s)?
3. At the time you were served or any subsequent time did you hold legal title to any property of any nature owed solely or in part by the defendant(s) or in which the defendant held or claimed any interest?
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 any interest?
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 direction or consent and what was the consideration thereof?
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 the defendant's 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 any subsequent time did the defendant(s) 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 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(s) 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 exemption under 42PA.C.S. §8123? If so, identify each account.
9. How much is the value of any property in your possession belonging to the defendant(s)?
10. In the space below, the plaintiff may set forth additional appropriate interrogatories.

Dated: 10/17/12



---

Benjamin J. Cavallaro, Esquire  
APOTNAKER & ASSOCIATES, P.C.  
520 Fellowship Road C306  
PO Box 5496  
Mount Laurel, New Jersey 08054  
(856) 780-1000  
Attorneys for Plaintiff

Our File No.: 136861

PORTFOLIO RECOVERY ASSOCIATES, LLC  
Plaintiff

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

vs.  
JAIME LEONARD  
Defendant(s)

NO.: 08-459-CD

PRAECIPE FOR WRIT OF EXECUTION

To the Prothonotary:

Issue a Writ of Execution in the above matter,

- (1) directed to the Sheriff of CLEARFIELD County;
- (2) against JAIME LEONARD, defendant(s); and
- (3) against FIRST COMMONWEALTH BANK 14303 CLEARFIELD SHAWVILLE HIGHWAY  
CLEARFIELD, PA 16830, Garnishee(s);
- (4) and index this writ in the judgment index

(a) against JAIME LEONARD, defendant(s), and

(b) against FIRST COMMONWEALTH BANK 14303 CLEARFIELD SHAWVILLE HIGHWAY  
CLEARFIELD, PA 16830, as Garnishee(s), as a lis pendens against the real property of the  
defendant(s) in the name of Garnishee(s) as follows:

Bank Attachment Only - All assets and accounts, including, but not limited to, bank accounts, brokerage  
firm accounts, stocks, cd's, insurance, safety deposit boxes, etc.

(5) Amount Due	\$3602.40
Interest from February 20, 2009	\$915.50
Minus Payments made	\$0.00
Plus Costs	\$275.00
Total	\$4793.30

**FILED** pa 820.00  
m 12:30pm  
JUN 05 2013 loc & lowitt  
to shell  
William A. Shaw  
Prothonotary/Clerk of Courts

David J. Apothaker, Esquire  
Attorney for Plaintiff(s)

Our File No.: 136861

PORTFOLIO RECOVERY ASSOCIATES, LLC  
Plaintiff

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

vs.

NO.: 08-459-CD

JAIME LEONARD  
Defendant(s)

WRIT OF EXECUTION (Money Judgment)

## **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, 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.

Midpenn Legal Services  
211 E Locust St  
Clearfield, PA 16830  
Phone: (814) 765-9646

## WRIT OF EXECUTION

Commonwealth of Pennsylvania, County of CLEARFIELD

TO THE SHERIFF OF CLEARFIELD COUNTY:

To satisfy the judgment, interest and costs against: JAIME LEONARD, defendant(s):

(1) You are directed to attach the property of the defendant(s) not levied upon in the possession of FIRST COMMONWEALTH BANK 14303 CLEARFIELD SHAWVILLE HIGHWAY CLEARFIELD, PA 16830 as Garnishee(s) and to notify the Garnishee(s) that

(a) An attachment has been issued:

(b) Except as provided in paragraph (c), the garnishee(s) is 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

(i) the first \$10,000 of each account of the defendant with a bank or other financial institution containing any funds which 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.

(ii) each account of the defendant with a bank or other financial institution in which funds on deposit exceed \$10,000 at any time if all 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.

(iii) any funds in an account of the defendant with a bank or other financial institution 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 not levied upon and subject to attachment is found in the possession of anyone other than the named garnishee(s), you are directed to notify such other person that he or she has been added as a garnishee and is enjoined as above stated.

Amount Due	\$3602.40
Interest from February 20, 2009	\$915.90
Minus Payments made	\$0.00
Costs to be added	\$275.00
Total	\$4793.30

**Prothonotary costs**

*\$155.00*

Dated: June 5, 2013

  
Prothonotary of CLEARFIELD County

BY: \_\_\_\_\_

### MAJOR EXEMPTIONS UNDER PENNSYLVANIA AND FEDERAL LAW

- (1) \$300.00 statutory exemption
- (2) Bibles, school books, sewing machines, uniforms and equipment
- (3) Most wages and unemployment compensation
- (4) Social Security benefits
- (5) Certain retirement funds and accounts
- (6) Certain veteran and armed forces benefits
- (7) Certain insurance proceeds
- (8) Such other exemptions as may be provided by law

NO. 08-459-CD

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

PORTFOLIO RECOVERY ASSOCIATES, LLC

VS.

JAIME LEONARD

WRIT OF EXECUTION  
(Money Judgments)

Claim	\$3602.40
Interest From February 20, 2009	\$915.50
Minus payments made	\$0.00
<u>Costs</u>	
Dept. of Court Records	\$40.00
Sheriff Fee	\$235.00

Apothaker & Associates, P.C.  
David J. Apothaker, Esquire  
520 Fellowship Road C306  
PO Box 5496  
Mount Laurel, NJ 08054  
(800) 672-0215  
ID # 38423

PORTFOLIO RECOVERY ASSOCIATES, LLC  
Plaintiff

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

vs.  
JAIME LEONARD  
Defendant(s)

NO.: 08-459-CD

### 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 property to be set aside in kind): \_\_\_\_\_;
    - ☐ (ii) paid in cash following the sale of the property levied upon; or
  - (b) I claim the following exemption (specify property and basis of exemption): \_\_\_\_\_.
- (2) From my property which is in the possession of a third party, I claim the following exemptions:
  - (a) my \$300 statutory exemption: ☐ in cash; ☐ in kind (specify property): \_\_\_\_\_;
  - (b) other (specify amount and basis of exemption): \_\_\_\_\_.

I request a prompt court hearing to determine the exemption. Notice of the hearing should be given to me at

\_\_\_\_\_ (Address),  
\_\_\_\_\_ (Telephone Number).

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

Date: \_\_\_\_\_ Defendant: \_\_\_\_\_

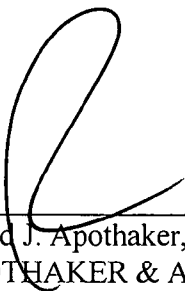
**THIS CLAIM TO BE FILED WITH:**

Clearfield County Sheriff's Office  
1 North Second Street  
Clearfield, PA 16830  
Phone: 814-765-2641 Ext: 5015



- 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 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(s) 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 exemption under 42PA.C.S. §8123? If so, identify each account.
9. How much is the value of any property in your possession belonging to the defendant(s)?
10. In the space below, the plaintiff may set forth additional appropriate interrogatories.

Dated: 5/20/13



---

David J. Apothaker, Esquire  
APOTHAKE & ASSOCIATES, P.C.  
520 Fellowship Road C306  
PO Box 5496  
Mount Laurel, New Jersey 08054  
(856) 780-1000  
Attorneys for Plaintiff

To Deputy 6/6/13

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
NO: 08-459-CD

PORTFOLIO RECOVERY ASSOCIATES, LLC

vs

SERVICE # 1 OF 2

JAIME LEONARD

TO: FIRST COMMONWEALTH BANK, Garnishee

WRIT OF EXECUTION, INTERROGATORIES

SERVE BY: 09/03/2013 **RUSH** HEARING: PAGE: 110733

DEFENDANT: FIRST COMMONWEALTH BANK, Garnishee  
ADDRESS: 14303 CLEARFIELD SHAWVILLE HIGHWAY  
CLEARFIELD, PA 16830

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: GARNISHEE

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT OCCUPIED

**FILED** (16)

JUN 07 2013

013-36166  
William A. Shaw

Prothonotary/Clerk of Courts

**SHERIFF'S RETURN**

NOW, 6-7-13 AT 9:46 AM PM SERVED THE WITHIN

WRIT OF EXECUTION, INTERROGATORIES ON FIRST COMMONWEALTH BANK, Garnishee, DEFENDANT

BY HANDING TO CHRISTINA TAYLOR, MGR.

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

ADDRESS SERVED 14303 CLEARFIELD SHAWVILLE Hwy CLEARFIELD  
( ) Residence (X) Employment ( ) Sheriff's Office ( ) Other

NOW \_\_\_\_\_ AT \_\_\_\_\_ AM / PM POSTED THE WITHIN

WRIT OF EXECUTION, INTERROGATORIES 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 \_\_\_\_\_ 2013

So Answers CHESTER A. HAWKINS, SHERIFF

BY:

George F. DeHaven  
Deputy Signature  
George F. DeHaven  
Print Deputy Name

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

Dkt Pg. 110733

2 of 2

PORTFOLIO RECOVERY ASSOCIATES, LLC

NO. 08-459-CD

vs

JAIME LEONARD

WRIT OF EXECUTION/  
INTERROGATORIES TO  
GARNISHEE

TO: FIRST COMMONWEALTH BANK, Garnishee

**SHERIFF'S RETURN**

NOW JUNE 7, 2013 MAILED THE WITHIN:

PRAECIPE, WRIT NOTICE, WRIT, CLAIM FOR EXEMPTION, INTERROGATORIE

TO: JAIME LEONARD, DEFENDANT

AT: 45 HARPER RD., DUBOIS, PA. 15801-7409

IN THE S.A.S.E.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 110733  
NO: 08-459-CD  
SERVICES 2

WRIT OF EXECUTION, INTERROGATORIES

PLAINTIFF: PORTFOLIO RECOVERY ASSOCIATES, LLC  
vs.  
DEFENDANT: JAIME LEONARD  
TO: FIRST COMMONWEALTH BANK, Garnishee

SHERIFF RETURN

---

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	APOTHAKE	79834	20.00
SHERIFF HAWKINS	APOTHAKE	79834	28.50

Sworn to Before Me This

\_\_\_\_\_ Day of \_\_\_\_\_ 2013

So Answers,



Chester A. Hawkins  
Sheriff

Our File No.: 136861

RECEIVED

JUN 07 2013

PORTFOLIO RECOVERY ASSOCIATES, LLC

Plaintiff

vs.

COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY

JAIME LEONARD  
45 HARPER RD  
DU BOIS, PA 15801-7409  
XXX-XX-6085

Defendant

NO.: 08-459-CD

Civil Action

FILED

JUN 13 2013

William A. Shaw  
Prothonotary/Clerk of Courts

FIRST COMMONWEALTH BANK

Garnishee

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

### INTERROGATORIES TO GARNISHEE

TO: FIRST COMMONWEALTH BANK, Garnishee:


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.

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 defendant(s) any money or were liable to defendant(s) for any reason?
2. At the time you were served or at any subsequent time was there in your possession, custody, control or in the joint possession, custody or control of yourself and one or more persons any property of any nature owned solely or in part by the defendant(s)?
3. At the time you were served or any subsequent time did you hold legal title to any property of any nature owed solely or in part by the defendant(s) or in which the defendant held or claimed any interest?
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 any interest?
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 direction or consent and what was the consideration thereof?
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 the defendant's 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 any subsequent time did the defendant(s) 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 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(s) 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 exemption under 42PA.C.S. §8123? If so, identify each account.
9. How much is the value of any property in your possession belonging to the defendant(s)?
10. In the space below, the plaintiff may set forth additional appropriate interrogatories.

Dated:

5/20/13



---

David J. Apothaker, Esquire  
APOTHAKE & ASSOCIATES, P.C.  
520 Fellowship Road C306  
PO Box 5496  
Mount Laurel, New Jersey 08054  
(856) 780-1000  
Attorneys for Plaintiff

EXHIBIT "A"

ANSWERS TO INTERROGATORIES

1. No
2. No
3. No
4. No
5. No
6. No
7. N/A
8. N/A
9. N/A
10. N/A

## VERIFICATION

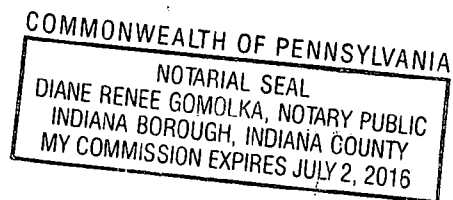
COMMONWEALTH OF PENNSYLVANIA )  
 )  
COUNTY OF INDIANA )

On this 10<sup>th</sup> day of June 2013 before me, the undersigned officer, a Notary Public in and for said Commonwealth and County, personally appeared LEDA E MCCracken, who being duly sworn according to law, acknowledged that she is Assistant Vice President of First Commonwealth Bank, and that the facts set forth in the foregoing Interrogatories are true and correct to the best of her knowledge and belief.

Leda E. McCracken  
Leda E. McCracken, Asst. Vice President  
First Commonwealth Bank

Sworn and subscribed to before me  
This 10 day of June 2013

Renee Smolha  
Notary Public



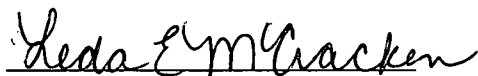
**CERTIFICATE OF SERVICE**

I hereby certify that on June 10, 2013 I have this day caused to be served a true and correct copy of this ANSWERS TO INTERROGATORIES upon the following parties:

**VIA REGULAR U.S. MAIL**

*David J. Apothaker, Esquire  
Apothaker & Associates, PC  
520 Fellowship Road C306  
PO Box 5496  
Mount Laurel, NJ 08054*

*As Plaintiff*



Leda E. McCracken  
Assistant Vice President  
First Commonwealth Bank