

BalaPointe Office Centre 111 Presidential Boulevard, Suite 215 Bala Cynwyd, PA 19004 (610) 668-2440 1-800-537-1162

February 4, 1999

## VIA TELECOPY (570) 784-0257

Sheriff of Columbia County 35 West Main Street Bloomsburg, PA 17815

Re:

American Business Credit, Inc. ("ABC") vs. Meglyn Thomas d/b/a Mings International Dining and Naoma Thomas

Case No. 98-CV-781

Dear Sheriff:

Please be advised that American Business Credit, Inc. ("ABC") and Meglyn Thomas and Naoma Thomas (collectively, the "Borrowers"), have entered into an agreement to stop the sale of the property securing ABC's loan, which sale is scheduled for today, February 4, 1999 at 11:00 a.m.

The agreement has been fully executed, and provided for the payment of \$6,000.00 from the Borrowers to ABC, which payment has been received. Accordingly, pursuant to our telephone conversation, ABC is aware that poundage of \$120.00 is due upon this settlement payment.

Further, pursuant to our conversation, please postpone the sale of this property until Thursday, June 3, 1999, at such time on that date as you deem appropriate. Please advise us of the exact time of such sale.

In addition, please advise us of all sums which may be due with respect to the postponed sale date.

If you have any questions, please feel free to call me.

Sincerely,

AMERICAN BUSINESS CREDIT, INC.

By:

Rehiamin Reich Counsel

BR/jl

cc:

Jeffrey M. Ruben, Executive Vice President and General Counsel

Marcy C. Panzer, Vice President - Legal Affairs

Meglyn Thomas

Naoma Thomas

f:\shared\legal\abc\thomas\nmc\postpone shenff sale ltr.doc

# AMERICAN BUSINESS CREDIT, INC. 111 Presidential Blvd., Suite 215 Bala Cynwyd, PA 19004 (610) 668-2440 Fax (610) 617-4967 FAX TRANSMISSION COVER SHEET

Date:	January 4, 1999
To:	Sheriff of Columbia County
Fax:	(570) 784-0257
Sender:	Benjamin Reich, Esquire
Re:	ABC v. Thomas - Sheriff Sale
pages, plea	se call (610) 668-2440, extension 5570.
THE OR	IGINAL WILL WILL NOT FOLLOW BY: REGULAR MAIL OVERNIGHT MAIL CERTIFIED MAIL HAND DELIVERY FEDERAL EXPRESS
of the Add or the emp hereby no If you hav	mile contains privileged and confidential information intended only for the use dressee(s) named above. If you are not the intended recipient of this facsimile, ployee or agent responsible for delivering it to the intended recipient, you are tified that any dissemination or copying of this facsimile is strictly prohibited, re received this facsimile in error, please immediately notify us by telephone the original facsimile to us at the above address via the U.S. Postal Service.
Thank you	u.

## HARRY A. ROADARMEL, JR.



#### SHERIFF OF COLUMBIA COUNTY COURT HOUSE - P.O. BOX 380 BLOOMSBURG, PA 17815

FAX: (570) 784-0257

24 HOUR PHONE (570) 784-6300

PHONE (570) 389-5622

AMERICAN BUSINESS CREDIT INC.

98- SMF-000110

VS

WRIT OF EXECUTION

THOMAS, MEGLYN

SHERIFF'S COST\$

NOW,
HIGH SHERIFF OF COLUMBIA COUNTY, PENNSYLVANIA, DO HEREBY DEPUTIZE THE SHERIFF OF
PENNSYLVANIA, TO EXECUTE
THIS WRIT DEPUTATION BEING MADE AT THE REQUEST AND RISK OF THE
PLAINTIFF. DEFENDANT'S ADDRESS

## SHERIFF, COLUMBIA COUNTY, PENNSYLVANIA

#### AFFIDAVIT OF SERVICE

NOW, WEDNESDAY DECEMBER 16, 1998 , AT 08: 10 O'CLOCK A M, SERVED THE WITHIN WRIT OF EXECUTION UPON MEGLYN THOMAS AT COLUMBIA COUNTY SHERIFF'S

MEGLYN THOMAS AT COLUMBIA COUNTY SHERIFF'S OFFICE, BLOOMSBURG, PA

BY HANDING TO MEGLYN THOMAS A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT AND MADE KNOWN TO HER THE CONTENTS THEREOF.

SO ANSWERS,

SHERIFF HARRY A. ROADARMEL TR. COLUMBIA COUNTY SHERIFF

SWORN AND SUBSCRIBED BEFORE ME THIS 18TH DAY OF DECEMBER 1998

NOTARY PUBLIC SARAH HOWER

NOTARIAL SEAL
SARAH HOWER, Notary Public
Eleomshurg, Columbia County PA
My Commission Expires June 21, 1999

CHIEF DEPUTY SHERIFF TIMOTHY T. CHAMBERLAIN

## HARRY A. ROADARMEL, JR.



# SHERIFF OF COLUMBIA COUNTY

PHONE (570) 389-5622

COURT HOUSE - P.O. BOX 380 BLOOMSBURG, PA 17815 FAX: (570) 784-0257

24 HOUR PHONE (570) 784-6300

AMERICAN BUSINESS CREDIT INC.

98- SMF-000110

VS

WRIT OF EXECUTION

THOMAS, NAOMA

SHERIFF'S COST\$

I, HON. HARRY A. ROADARMEL JR. NOW, HIGH SHERIFF OF COLUMBIA COUNTY, PENNSYLVANIA, DO HEREBY DEPUTIZE THE SHERIFF OF PENNSYLVANIA, TO EXECUTE THIS WRIT DEPUTATION BEING MADE AT THE REQUEST AND RISK OF THE PLAINTIFF. DEFENDANT'S ADDRESS

# SHERIFF, COLUMBIA COUNTY, PENNSYLVANIA

#### AFFIDAVIT OF SERVICE

, AT NOW, TUESDAY DECEMBER 14, 1998 08:48 O'CLOCK AM, SERVED UPON THE WITHIN WRIT OF EXECUTION NAOMA THOMSA AT437 E 3RD ST BLOOMSBURG, PA

BY HANDING TO NAOMA THOMAS A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT AND MADE KNOWN TO HER THE CONTENTS THEREOF.

SWORN AND SUBSCRIBED BEFORE ME THIS 18TH DAY OF DECEMBER 1998

NOTARY PUBLIC SARAH HOWER

MOTARIAL SEAL SAHAH HOWER, Notary Public Bloomsburg, Columbia County PA My Commission Expires June 27, 1999. SO, ANSWERS,

COLUMBIA COUNTY SHERIFF

TIMOTHÝ T. CHAMBERLAIN

### HARRY A. ROADARMEL, JR.



#### SHERIFF OF COLUMBIA COUNTY COURT HOUSE - P.O. BOX 380 BLOOMSBURG, PA 17815

FAX: (570) 784-0257

24 HOUR PHONE (570) 784-6300

PHONE

(570) 389-5622

AMERICAN BUSINESS CREDIT INC.

98- SMF-000110

VS

INTERROGATORIES IN ATTACHMENT

FIRST COLUMBIA SAVINS BANK

SHERIFF'S COST\$

NOW,
HIGH SHERIFF OF COLUMBIA COUNTY, PENNSYLVANIA, DO HEREBY DEPUTIZE THE SHERIFF OF
PENNSYLVANIA, TO EXECUTE THIS WRIT DEPUTATION BEING MADE AT THE REQUEST AND RISK OF THE PLAINTIFF. DEFENDANT'S ADDRESS

#### SHERIFF, COLUMBIA COUNTY, PENNSYLVANIA

#### AFFIDAVIT OF SERVICE

NOW, FRIDAY DECEMBER 11, 1998 , AT 10 : 50 O'CLOCK A M, SERVED THE WITHIN INTERROGATORIES IN ATTACHMENT UPON FIRST COLUMBIA SAVINGS BANK AT 11 WEST MAIN ST BLOOMSBURG, PA

BY HANDING TO REBECCA WASLYK, RECEPTIONIST A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT AND MADE KNOWN TO HER THE CONTENTS THEREOF.

SWORN AND SUBSCRIBED BEFORE ME THIS 18TH DAY OF DECEMBER 1998

1,000

NOTARY PUBLIC SARAH HOWER

> NCTARIAL SEAL SARAH HOWER, Notary Public Bloomsburg, Columbia County PA My Commission Expires June 21, 1999

SO ANSWERS.

SHERIFF HARRY A. ROADARME COLUMBIA COUNTY SHERIFF

CHIEF DEPUTY SHERIFF TIMOTHY T. CHAMBERLAIN



BalaPointe Office Centre 111 Presidential Boulevard Bala Cynwyd, PA 19004 (610) 668-2440 1-800-537-1162

December 8, 1998

## VIA UNITED PARCEL SERVICE

Sheriff of Columbia County 35 West Main Street Bloomsburg, PA 17815

Re: American Business Credit, Inc. ("ABC") vs. Meglyn Thomas d/b/a Mings

International Dining and Naoma Thomas

Case No. 98-CV-781

Dear Sir/Madam:

Enclosed please find a Writ of Execution package along with five (5) copies. I have also enclosed four (4) copies of the Interrogatories in Attachment. Please serve the Writ package on the Garnishee, First Columbia Savings Bank at 11 West Main Street, Bloomsburg, PA 17815. I have also enclosed self-addressed stamped envelopes addressed to each defendant.

Our company check in the amount of \$100.00, payable to the Sheriff of Columbia County is enclosed to cover the cost of serving the Writ and the attachments. Please return a copy of the Sheriff's Return of Service form and a copy of the file stamped Execution package to us in the enclosed self-addressed stamped envelope.

If you have any questions or require anything further, please do not hesitate to contact me at (610) 668-2440, extension 7464.

Since	erely, ERICAN BUSINESS CREDIT, INC.	
MVID	MCAN BOSINESS CREDIT, INC.	
BY:_		
	Maureen T. Sutch, Legal Assistant	to
	Benjamin Reich, Counsel	

/mts

cc (w/o encls): Jeffrey M. Ruben, Executive Vice President and General Counsel Marcy C. Panzer, Vice President - Legal Affairs Benjamin Reich, Associate Counsel Loan File

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Attach all deposit accounts, checking accounts, money market accounts, certificates of deposit, mutual fund accounts, brokerage accounts, trading accounts, investment accounts, or other accounts of any kind or nature whatsoever, held in the name of or for the benefit of either of the following individuals:

Meglyn Thomas d/b/a Mings International Dining- SS# 164-48-4422 Naoma Thomas - SS# 172-34-3915.

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Attach all deposit accounts, checking accounts, money market accounts, certificates of deposit, mutual fund accounts, brokerage accounts, trading accounts, investment accounts, or other accounts of any kind or nature whatsoever, held in the name of or for the benefit of either of the following individuals:

Meglyn Thomas d/b/a Mings International Dining- SS# 164-48-4422 Naoma Thomas - SS# 172-34-3915.

F:\shared\legal\abc\thomas\plead\writ\_personal\exhibitA\_to\_writ

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Attach all deposit accounts, checking accounts, money market accounts, certificates of deposit, mutual fund accounts, brokerage accounts, trading accounts, investment accounts, or other accounts of any kind or nature whatsoever, held in the name of or for the benefit of either of the following individuals:

Meglyn Thomas d/b/a Mings International Dining - SS# 164-48-4422 Naoma Thomas - SS# 172-34-3915.

Benjamin Reich - Attorney No. 54439 By:

111 Presidential Boulevard - Suite 215

Bala Cynwyd, PA 19004

(610) 668-2440

(610) 617-4967 Telecopy

Attorney for Plaintiff

TRIAL DIVISION

COLUMBIA COUNTY

COURT OF COMMON PLEAS

AMERICAN BUSINESS CREDIT, INC.

Bala Pointe Office Centre

111 Presidential Blvd.,

Suite 215

Bala Cynwyd, PA 19004,

Plaintiff,

No. 98-CV-781

110 ED 1998

v.

MEGLYN THOMAS d/b/a MINGS INTERNATIONAL DINING 550 East 3rd Street Bloomsburg, PA 17815,

and

NAOMA THOMAS 550 East 3rd Street Bloomsburg, PA 17815,

Defendants,

FIRST COLUMBIA SAVINGS BANK

Bloomsburg, PA 17815,

and

11 West Main Street

Gamishee.

# **CERTIFICATION IN SUPPORT OF PRAECIPE FOR WRIT OF EXECUTION PURSUANT TO RULE 2957**

BENJAMIN REICH, ESQUIRE, counsel for American Business Credit, Inc., plaintiff herein, hereby certifies as follows:

The Praecipe for Writ of Execution is based upon a confessed judgment entered in the above-captioned matter.

2. The Prothonotary of Columbia County is authorized to issue the Praecipe for Writ of Execution because notice will be served pursuant to Rule 2958.3 because the property to be levied upon consists of personal property.

Benjamin Reich, Esquire

Attorney for American Business Credit, Inc.

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By: Benjamin Reich - Attorney No. 54439

111 Presidential Boulevard - Suite 215

Bala Cynwyd, PA 19004

(610) 668-2440

(610) 617-4967 Telecopy

Attorney for Plaintiff

TRIAL DIVISION

COLUMBIA COUNTY

AMERICAN BUSINESS CREDIT, INC.

Bala Pointe Office Centre

111 Presidential Blvd..

Suite 215

Bala Cynwyd, PA 19004,

Plaintiff,

V.

**MEGLYN THOMAS** 

d/b/a MINGS INTERNATIONAL DINING

550 East 3rd Street

Bloomsburg, PA 17815,

and

NAOMA THOMAS

550 East 3rd Street

Bloomsburg, PA 17815,

Defendants,

and

FIRST COLUMBIA SAVINGS BANK

11 West Main Street

Bloomsburg, PA 17815,

Gamishee.

No. 98-CV-781 110-ED-1998

COURT OF COMMON PLEAS

# CERTIFICATION IN SUPPORT OF PRAECIPE FOR WRIT OF EXECUTION **PURSUANT TO RULE 2957**

BENJAMIN REICH, ESQUIRE, counsel for American Business Credit, Inc., plaintiff herein, hereby certifies as follows:

The Praecipe for Writ of Execution is based upon a confessed judgment entered in the above-captioned matter.

2. The Prothonotary of Columbia County is authorized to issue the Praecipe for Writ of Execution because notice will be served pursuant to Rule 2958.3 because the property to be levied upon consists of personal property.

Benjamin Reich, Esquire

Attorney for American Business Credit, Inc.

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By: Benjamin Reich - Attorney No. 54439

111 Presidential Boulevard - Suite 215

Bala Cynwyd, PA 19004

(610) 668-2440

(610) 617-4967 Telecopy

Attorney for Plaintiff

AMERICAN BUSINESS CREDIT, INC. : COLUMBIA COUNTY

Bala Pointe Office Centre : COURT OF COMMON PLEAS

111 Presidential Blvd., : TRIAL DIVISION Suite 215 :

Bala Cynwyd, PA 19004,

Plaintiff, : No. 98-0

d/b/a MINGS INTERNATIONAL DINING 550 East 3<sup>rd</sup> Street Bloomsburg, PA 17815,

and

NAOMA THOMAS 550 East 3<sup>rd</sup> Street Bloomsburg, PA 17815,

Defendants,

and

FIRST COLUMBIA SAVINGS BANK 11 West Main Street Bloomsburg, PA 17815,

Garnishee.

No. 98-CV-781 110 (=1) -1998

Notice Under Rule 2958.3 of Judgment and Execution Thereon

Notice of Defendant's Rights

TO: NAOMA THOMAS 441 East 3<sup>rd</sup> Street Bloomsburg, PA 17815 A judgment in the amount of \$71,713.98 has been entered against you and in favor of the plaintiff without any prior notice or hearing based on a confession of judgment contained in a written agreement or other paper allegedly signed by you. The court has issued a writ of execution which directs the sheriff to take your money or other property owned by you to pay the judgment.

If your money or property has been taken, you have the right to get the money or property back if you did not voluntarily, intelligently and knowingly give up your constitutional right to notice and hearing prior to the entry of judgment or if you have defenses or other valid objections to the judgment.

You have a right to a prompt court hearing if you claim that you did not voluntarily, intelligently and knowingly give up your rights to notice and hearing prior to the entry of the judgment. If you wish to exercise this right, you must immediately fill out and sign the petition to strike the judgment which accompanies the writ of execution and deliver it to the Sheriff of Columbia County at 35 West Main Street, Bloomsburg, PA 18715.

IT IS IMPORTANT THAT YOU ACT PROMPTLY. IT WILL BE TOO LATE TO REGAIN YOUR PROPERTY IF YOU WAIT UNTIL AFTER THE PROPERTY HAS BEEN SOLD BY THE SHERIFF OR TURNED OVER TO THE PLAINTIFF.

YOU MUST FILE A PETITION SEEKING RELIEF FROM THE JUDGMENT AND PRESENT IT TO A JUDGE WITHIN THIRTY (30) DAYS AFTER THE DATE ON WHICH THIS NOTICE IS SERVED ON YOU OR YOU MAY LOSE YOUR RIGHTS.

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:

SUSQUEHANNA LEGAL SERVICES 168 EAST 5<sup>TH</sup> STREET BLOOMSBURG, PA 17815 (717) 784-8760

> Benjamin Reich, Esquire Attorney for Plaintiff,

American Business Credit, Inc.

BalaPointe Office Centre 111 Presidential Boulevard Suite 215

Bala Cynwyd, PA 19004 (610) 668-2440

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By: Benjamin Reich - Attorney No. 54439

111 Presidential Boulevard - Suite 215

Bala Cynwyd, PA 19004

(610) 668-2440

(610) 617-4967 Telecopy

Attorney for Plaintiff

TRIAL DIVISION

COLUMBIA COUNTY

COURT OF COMMON PLEAS

AMERICAN BUSINESS CREDIT, INC.

Bala Pointe Office Centre

111 Presidential Blvd.,

Suite 215

Bala Cynwyd, PA 19004,

Plaintiff,

amun,

V.

No. 98-CV-781

110-ED-1998

MEGLYN THOMAS

d/b/a MINGS INTERNATIONAL DINING

550 East 3rd Street

Bloomsburg, PA 17815,

and

NAOMA THOMAS

550 East 3rd Street

Bloomsburg, PA 17815,

Defendants,

and

FIRST COLUMBIA SAVINGS BANK

11 West Main Street

Bloomsburg, PA 17815,

Garnishee.

Notice Under Rule 2958.3 of Judgment and Execution Thereon

Notice of Defendant's Rights

TO: NAOMA THOMAS

441 East 3rd Street

Bloomsburg, PA 17815

A judgment in the amount of \$71,713.98 has been entered against you and in favor of the plaintiff without any prior notice or hearing based on a confession of judgment contained in a written agreement or other paper allegedly signed by you. The court has issued a writ of execution which directs the sheriff to take your money or other property owned by you to pay the judgment.

If your money or property has been taken, you have the right to get the money or property back if you did not voluntarily, intelligently and knowingly give up your constitutional right to notice and hearing prior to the entry of judgment or if you have defenses or other valid objections to the judgment.

You have a right to a prompt court hearing if you claim that you did not voluntarily, intelligently and knowingly give up your rights to notice and hearing prior to the entry of the judgment. If you wish to exercise this right, you must immediately fill out and sign the petition to strike the judgment which accompanies the writ of execution and deliver it to the Sheriff of Columbia County at 35 West Main Street, Bloomsburg, PA 18715.

IT IS IMPORTANT THAT YOU ACT PROMPTLY. IT WILL BE TOO LATE TO REGAIN YOUR PROPERTY IF YOU WAIT UNTIL AFTER THE PROPERTY HAS BEEN SOLD BY THE SHERIFF OR TURNED OVER TO THE PLAINTIFF.

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SUSQUEHANNA LEGAL SERVICES 168 EAST 5<sup>TH</sup> STREET BLOOMSBURG, PA 17815 (717) 784-8760

> Benjamin Reich, Esquire Attorney for Plaintiff.

American Business Credit, Inc.

BalaPointe Office Centre 111 Presidential Boulevard

Suite 215

Bala Cynwyd, PA 19004 (610) 668-2440

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By: Benjamin Reich - Attorney No. 54439

111 Presidential Boulevard - Suite 215

Bala Cynwyd, PA 19004

(610) 668-2440

(610) 617-4967 Telecopy

Attorney for Plaintiff

TRIAL DIVISION

COLUMBIA COUNTY

COURT OF COMMON PLEAS

AMERICAN BUSINESS CREDIT, INC.

Bala Pointe Office Centre

111 Presidential Blvd..

Suite 215

Bala Cynwyd, PA 19004,

Plaintiff,

No. 98-CV-781

110-ED-1998

v.

MEGLYN THOMAS d/b/a MINGS INTERNATIONAL DINING 550 East 3<sup>rd</sup> Street

Bloomsburg, PA 17815,

and

NAOMA THOMAS 550 East 3<sup>rd</sup> Street Bloomsburg, PA 17815,

Defendants,

and

FIRST COLUMBIA SAVINGS BANK 11 West Main Street Bloomsburg, PA 17815,

Garnishee.

Notice Under Rule 2958.3 of Judgment and Execution Thereon

Notice of Defendant's Rights

TO: NAOMA THOMAS

441 East 3rd Street

Bloomsburg, PA 17815

A judgment in the amount of \$71,713.98 has been entered against you and in favor of the plaintiff without any prior notice or hearing based on a confession of judgment contained in a written agreement or other paper allegedly signed by you. The court has issued a writ of execution which directs the sheriff to take your money or other property owned by you to pay the judgment.

If your money or property has been taken, you have the right to get the money or property back if you did not voluntarily, intelligently and knowingly give up your constitutional right to notice and hearing prior to the entry of judgment or if you have defenses or other valid objections to the judgment.

You have a right to a prompt court hearing if you claim that you did not voluntarily, intelligently and knowingly give up your rights to notice and hearing prior to the entry of the judgment. If you wish to exercise this right, you must immediately fill out and sign the petition to strike the judgment which accompanies the writ of execution and deliver it to the Sheriff of Columbia County at 35 West Main Street, Bloomsburg, PA 18715.

IT IS IMPORTANT THAT YOU ACT PROMPTLY. IT WILL BE TOO LATE TO REGAIN YOUR PROPERTY IF YOU WAIT UNTIL AFTER THE PROPERTY HAS BEEN SOLD BY THE SHERIFF OR TURNED OVER TO THE PLAINTIFF.

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SUSQUEHANNA LEGAL SERVICES 168 EAST 5<sup>TH</sup> STREET BLOOMSBURG, PA 17815 (717) 784-8760

> Benjamin Reich, Esquire Attorney for Plaintiff,

American Business Credit, Inc.

BalaPointe Office Centre 111 Presidential Boulevard

Suite 215

Bala Cynwyd, PA 19004

(610) 668-2440

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By: Benjamin Reich - Attorney No. 54439

111 Presidential Boulevard - Suite 215

Bala Cynwyd, PA 19004

(610) 668-2440

(610) 617-4967 Telecopy

Attorney for Plaintiff

TRIAL DIVISION

COLUMBIA COUNTY

COURT OF COMMON PLEAS

AMERICAN BUSINESS CREDIT, INC.

Bala Pointe Office Centre

111 Presidential Blvd.,

Suite 215

Bala Cynwyd, PA 19004,

:

Plaintiff,

٧.

: No. 98-CV-781

MEGLYN THOMAS d/b/a MINGS INTERNATIONAL DINING

550 East 3rd Street

Bloomsburg, PA 17815,

and

NAOMA THOMAS

550 East 3rd Street

Bloomsburg, PA 17815,

Defendants,

and

FIRST COLUMBIA SAVINGS BANK

11 West Main Street

Bloomsburg, PA 17815,

Garnishee.

110-ED-1998

Notice Under Rule 2958.3 of Judgment and Execution Thereon

Notice of Defendant's Rights

TO: NAOMA THOMAS

441 East 3rd Street

Bloomsburg, PA 17815

A judgment in the amount of \$71,713.98 has been entered against you and in favor of the plaintiff without any prior notice or hearing based on a confession of judgment contained in a written agreement or other paper allegedly signed by you. The court has issued a writ of execution which directs the sheriff to take your money or other property owned by you to pay the judgment.

If your money or property has been taken, you have the right to get the money or property back if you did not voluntarily, intelligently and knowingly give up your constitutional right to notice and hearing prior to the entry of judgment or if you have defenses or other valid objections to the judgment.

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SUSQUEHANNA LEGAL SERVICES 168 EAST 5<sup>TH</sup> STREET BLOOMSBURG, PA 17815 (717) 784-8760

Benjamin Reich, Esquire Attorney for Plaintiff,

American Business Credit, Inc.

BalaPointe Office Centre 111 Presidential Boulevard

Suite 215

Bala Cynwyd, PA 19004

(610) 668-2440

Benjamin Reich - Attorney No. 54439 By:

111 Presidential Boulevard - Suite 215

Bala Cynwyd, PA 19004

(610) 668-2440

(610) 617-4967 Telecopy

Attorney for Plaintiff

TRIAL DIVISION

COLUMBIA COUNTY

AMERICAN BUSINESS CREDIT, INC.

Bala Pointe Office Centre

111 Presidential Blvd.,

Suite 215

Bala Cynwyd, PA 19004,

Plaintiff,

v.

No. 98-CV-781 110 ED-1998

COURT OF COMMON PLEAS

MEGLYN THOMAS d/b/a MINGS INTERNATIONAL DINING 550 East 3rd Street

Bloomsburg, PA 17815,

and

NAOMA THOMAS 550 East 3rd Street

Bloomsburg, PA 17815,

Defendants,

and

FIRST COLUMBIA SAVINGS BANK

11 West Main Street

Bloomsburg, PA 17815,

Gamishee.

# **INTERROGATORIES IN ATTACHMENT**

TO: FIRST COLUMBIA SAVINGS BANK

11 West Main Street

Bloomsburg, PA 17815

(Garnishee)

RE: MEGLYN THOMAS d/b/a MINGS INTERNATIONAL DINING SS# 164-48-4422

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 a default judgment against you.

- 1. At the time you were served or at any subsequent time, did you owe the defendant any money or were you liable to him on any negotiable or other written instrument, or did he claim that you owed him any money or were liable to him for any reason?
- 2. At the time you were served or at any subsequent time, was there in your possession, custody or control or in the joint possession, custody or control of yourself and one or more other persons any property of any nature owned solely or in part by the defendant?
- 3. At the time you were served or at any subsequent time, did you hold legal title to any property of any nature owned solely or in part by the defendant or in which 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 had an interest?
- 5. At any time before or after you were served, did the defendant transfer or deliver any property to you or to any person or place pursuant to your direction or consent and if so what was the consideration therefor?
- 6. At any time after you were served, did you pay, transfer or deliver any money or property to the defendant or to any person or place pursuant to the defendant's direction or otherwise discharge any claim of the defendant against you?
- 7. At the time you were served or at any subsequent time, did you have any safe deposit boxes, pledges, documents of title, securities, notes, coupons, receivables, collateral, checking, savings, tax or other accounts or deposits in which defendant has an interest?

Benjamin Reich, Esquire

Attorney for Plaintiff,

AMERICAN BUSINESS CREDIT, INC.

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Benjamin Reich - Attorney No. 54439 By:

111 Presidential Boulevard - Suite 215

Bala Cynwyd, PA 19004

(610) 668-2440

(610) 617-4967 Telecopy

Attorney for Plaintiff

TRIAL DIVISION

COLUMBIA COUNTY

COURT OF COMMON PLEAS

AMERICAN BUSINESS CREDIT, INC.

Bala Pointe Office Centre

111 Presidential Blvd.,

Suite 215

Bala Cynwyd, PA 19004,

Plaintiff,

v.

No. 98-CV-781 110-ED 1998

MEGLYN THOMAS d/b/a MINGS INTERNATIONAL DINING 550 East 3rd Street Bloomsburg, PA 17815,

and

NAOMA THOMAS 550 East 3rd Street Bloomsburg, PA 17815,

Defendants,

and

FIRST COLUMBIA SAVINGS BANK 11 West Main Street Bloomsburg, PA 17815,

Garnishee.

# INTERROGATORIES IN ATTACHMENT

TO: FIRST COLUMBIA SAVINGS BANK 11 West Main Street Bloomsburg, PA 17815 (Garnishee)

RE: MEGLYN THOMAS d/b/a MINGS INTERNATIONAL DINING SS# 164-48-4422

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 a default judgment against you.

- 1. At the time you were served or at any subsequent time, did you owe the defendant any money or were you liable to him on any negotiable or other written instrument, or did he claim that you owed him any money or were liable to him for any reason?
- 2. At the time you were served or at any subsequent time, was there in your possession, custody or control or in the joint possession, custody or control of yourself and one or more other persons any property of any nature owned solely or in part by the defendant?
- 3. At the time you were served or at any subsequent time, did you hold legal title to any property of any nature owned solely or in part by the defendant or in which 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 had an interest?
- 5. At any time before or after you were served, did the defendant transfer or deliver any property to you or to any person or place pursuant to your direction or consent and if so what was the consideration therefor?
- 6. At any time after you were served, did you pay, transfer or deliver any money or property to the defendant or to any person or place pursuant to the defendant's direction or otherwise discharge any claim of the defendant against you?
- 7. At the time you were served or at any subsequent time, did you have any safe deposit boxes, pledges, documents of title, securities, notes, coupons, receivables, collateral, checking, savings, tax or other accounts or deposits in which defendant has an interest?

Benjamin Reich, Esquire Attorney for Plaintiff,

AMERICAN BUSINESS CREDIT, INC.

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By: Benjamin Reich - Attorney No. 54439

111 Presidential Boulevard - Suite 215

Bala Cynwyd, PA 19004

(610) 668-2440

(610) 617-4967 Telecopy

Attorney for Plaintiff

TRIAL DIVISION

COLUMBIA COUNTY

COURT OF COMMON PLEAS

AMERICAN BUSINESS CREDIT, INC.

Bala Pointe Office Centre

111 Presidential Blvd.,

Suite 215

Bala Cynwyd, PA 19004,

Plaintiff,

No. 98-CV-781

110-ED-1998

٧.

MEGLYN THOMAS d/b/a MINGS INTERNATIONAL DINING 550 East 3<sup>rd</sup> Street

Bloomsburg, PA 17815,

and

NAOMA THOMAS 550 East 3<sup>rd</sup> Street

Bloomsburg, PA 17815,

Defendants,

and

FIRST COLUMBIA SAVINGS BANK

11 West Main Street

Bloomsburg, PA 17815,

Garnishee.

# **INTERROGATORIES IN ATTACHMENT**

TO: FIRST COLUMBIA SAVINGS BANK

11 West Main Street

Bloomsburg, PA 17815

(Garnishee)

RE: MEGLYN THOMAS d/b/a MINGS INTERNATIONAL DINING SS# 164-48-4422

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Benjamin Reich, Esquire

Attorney for Plaintiff,

AMERICAN BUSINESS CREDIT, INC.

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By: Benjamin Reich - Attorney No. 54439

111 Presidential Boulevard - Suite 215

Bala Cynwyd, PA 19004

(610) 668-2440

(610) 617-4967 Telecopy

Attorney for Plaintiff

TRIAL DIVISION

COLUMBIA COUNTY

COURT OF COMMON PLEAS

AMERICAN BUSINESS CREDIT, INC.

Bala Pointe Office Centre

111 Presidential Blvd.,

Suite 215

Bala Cynwyd, PA 19004,

Plaintiff,

V.

No. 98-CV-781

110-ED-1998

MEGLYN THOMAS d/b/a MINGS INTERNATIONAL DINING 550 East 3<sup>rd</sup> Street Bloomsburg, PA 17815,

and

NAOMA THOMAS 550 East 3<sup>rd</sup> Street Bloomsburg, PA 17815,

Defendants,

and

FIRST COLUMBIA SAVINGS BANK 11 West Main Street Bloomsburg, PA 17815,

Garnishee.

#### INTERROGATORIES IN ATTACHMENT

TO: FIRST COLUMBIA SAVINGS BANK

11 West Main Street Bloomsburg, PA 17815

(Garnishee)

RE: MEGLYN THOMAS d/b/a MINGS INTERNATIONAL DINING SS# 164-48-4422

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Benjamin Reich, Esquire

Attorney for Plaintiff,

AMERICAN BUSINESS CREDIT, INC.

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By: Benjamin Reich - Attorney No. 54439

111 Presidential Boulevard - Suite 215

Bala Cynwyd, PA 19004

(610) 668-2440

(610) 617-4967 Telecopy

Attorney for Plaintiff

TRIAL DIVISION

COLUMBIA COUNTY

COURT OF COMMON PLEAS

AMERICAN BUSINESS CREDIT, INC.

Bala Pointe Office Centre

111 Presidential Blvd..

Suite 215

Bala Cynwyd, PA 19004,

Plaintiff,

v.

No. 98-CV-781

110 ED-1998

MEGLYN THOMAS d/b/a MINGS INTERNATIONAL DINING 550 East 3<sup>rd</sup> Street Bloomsburg, PA 17815,

and

NAOMA THOMAS 550 East 3<sup>rd</sup> Street Bloomsburg, PA 17815,

Defendants,

and

FIRST COLUMBIA SAVINGS BANK 11 West Main Street Bloomsburg, PA 17815,

Garnishee.

# **INTERROGATORIES IN ATTACHMENT**

TO: FIRST COLUMBIA SAVINGS BANK

11 West Main Street Bloomsburg, PA 17815

(Garnishee)

RE: MEGLYN THOMAS d/b/a MINGS INTERNATIONAL DINING SS# 164-48-4422

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Benjamin Reich, Esquire Attorney for Plaintiff,

AMERICAN BUSINESS CREDIT, INC.

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By: Benjamin Reich - Attorney No. 54439

111 Presidential Boulevard - Suite 215

Bala Cynwyd, PA 19004

(610) 668-2440

(610) 617-4967 Telecopy

AMERICAN BUSINESS CREDIT, INC.

Bala Pointe Office Centre

111 Presidential Blvd.,

Suite 215

Bala Cynwyd, PA 19004,

Plaintiff,

v.

MEGLYN THOMAS d/b/a MINGS INTERNATIONAL DINING 550 East 3<sup>rd</sup> Street

Bloomsburg, PA 17815,

and

NAOMA THOMAS 550 East 3<sup>rd</sup> Street

Bloomsburg, PA 17815,

Defendants,

and

FIRST COLUMBIA SAVINGS BANK

11 West Main Street

Bloomsburg, PA 17815,

Garnishee.

Attorney for Plaintiff

COLUMBIA COUNTY

COURT OF COMMON PLEAS

TRIAL DIVISION

No. 98-CV-781

110-ED-1998

INTERROGATORIES IN ATTACHMENT

TO: FIRST COLUMBIA SAVINGS BANK

11 West Main Street

Bloomsburg, PA 17815

(Garnishee)

RE: MEGLYN THOMAS d/b/a MINGS INTERNATIONAL DINING SS# 164-48-4422

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Benjamin Reich, Esquire Attorney for Plaintiff.

AMERICAN BUSINESS CREDIT, INC.

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By: Benjamin Reich - Attorney No. 54439 111 Presidential Boulevard - Suite 215 Bala Cynwyd, PA 19004 (610) 668-2440 (610) 617-4967 Telecopy

AMERICAN BUSINESS CREDIT, INC.

Bala Pointe Office Centre 111 Presidential Blvd., Suite 215 Bala Cynwyd, PA 19004,

Plaintiff,

v.

MEGLYN THOMAS d/b/a MINGS INTERNATIONAL DINING 550 East 3<sup>rd</sup> Street Bloomsburg, PA 17815,

and

NAOMA THOMAS 550 East 3<sup>rd</sup> Street Bloomsburg, PA 17815,

Defendants,

and

FIRST COLUMBIA SAVINGS BANK 11 West Main Street Bloomsburg, PA 17815,

Garnishee.

Attorney for Plaintiff

COLUMBIA COUNTY COURT OF COMMON PLEAS TRIAL DIVISION

No. 98-CV-781

110-ED1998

# **INTERROGATORIES IN ATTACHMENT**

TO: FIRST COLUMBIA SAVINGS BANK 11 West Main Street

Bloomsburg, PA 17815

(Garnishee)

RE: MEGLYN THOMAS d/b/a MINGS INTERNATIONAL DINING SS# 164-48-4422

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Benjamin Reich, Esquire

Attorney for Plaintiff,

AMERICAN BUSINESS CREDIT, INC.

AMERICAN BUSINESS CREDIT, INC.

Benjamin Reich - Attorney No. 54439

111 Presidential Boulevard - Suite 215

Bala Cynwyd, PA 19004

(610) 668-2440

(610) 617-4967 Telecopy

Attorney for Plaintiff

COLUMBIA COUNTY

COURT OF COMMON PLEAS TRIAL DIVISION

AMERICAN BUSINESS CREDIT, INC.

Bala Pointe Office Centre

111 Presidential Blvd.,

Suite 215

Bala Cynwyd, PA 19004,

Plaintiff,

v.

**MEGLYN THOMAS** 

d/b/a MINGS INTERNATIONAL DINING

550 East 3<sup>rd</sup> Street

Bloomsburg, PA 17815,

and

NAOMA THOMAS

550 East 3rd Street

Bloomsburg, PA 17815,

Defendants,

and

FIRST COLUMBIA SAVINGS BANK

11 West Main Street

Bloomsburg, PA 17815.

Garnishee.

No. 98-CV-781 //O-ED-1998

#### **INTERROGATORIES IN ATTACHMENT**

TO: FIRST COLUMBIA SAVINGS BANK

> 11 West Main Street Bloomsburg, PA 17815

(Garnishee)

RE: MEGLYN THOMAS d/b/a MINGS INTERNATIONAL DINING SS# 164-48-4422

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Benjamin Reich, Esquire Attorney for Plaintiff,

AMERICAN BUSINESS CREDIT, INC.

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111 Presidential Boulevard - Suite 215 Benjamin Reich - Attorney No. 54439 **VWEKICAN BUSINESS CREDIT, INC.** 

Bala Cynwyd, PA 19004

010) 998-2440

(610) 617-4967 Telecopy

YMEKICYN BOSINESS CKEDIL' INC.

Suite 215 111 Presidential Blvd., Bala Pointe Office Centre

Bala Cynwyd, PA 19004,

٠٨

Plaintiff,

Bloomsburg, PA 17815, 550 East 312 Street Q/P/4 MINGS INTERNATIONAL DINING **MECLYN THOMAS** 

gug

**SAMOHT AMOAN** 

Bloomsburg, PA 17815, 550 East 3th Street

:OT

Defendants,

gug

Bloomsburg, PA 17815, 11 West Main Street FIRST COLUMBIA SAVINGS BANK

Garnishee.

#### INTERROGATORIES IN ATTACHMENT

(Garnishee) Bloomsburg, PA 17815 11 West Main Street FIRST COLUMBIA SAVINGS BANK

No. 98-CV-781

COURT OF COMMON PLEAS

3551-011

TRIAL DIVISION

COLUMBIA COUNTY

Attorney for Plaintiff

# RE: NAOMA THOMAS SS# 172-34-3915

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 a default judgment against you.

- I. At the time you were served or at any subsequent time, did you owe the defendant any money or were you liable to him on any negotiable or other written instrument, or did he claim that you owed him any money or were liable to him for any reason?
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Benjamin Reich, Esquire Attorney for Plaintiff, American Plaintiff, f:/shared/legal/abc/thomas/plead/writ\_personal/gamrogs.doc

Bala Cynwyd, PA 19004 111 Presidential Boulevard - Suite 215 Benjamin Reich - Attorney No. 54439 AMERICAN BUSINESS CREDIT, INC.

(610) 668-2440

(610) 617-4967 Telecopy

Bala Pointe Office Centre YMERICYN BUSINESS CREDIT, INC.

Suite 215 111 Presidential Bivd.,

Bala Cynwyd, PA 19004,

Plaintiff,

8661 (J.J. 011

COURT OF COMMON PLEAS

No. 98-CV-781

TRIAL DIVISION

COLUMBIA COUNTY

Attorney for Plaintiff

Bloomsburg, PA 17815, 550 East 3rd Street Q/P/8 MINGS INTERNATIONAL DINING **MECLYN THOMAS** 

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guq

Bloomsburg, PA 17815, 550 East 3th Street **SAMOHT AMOAN** 

:OT

Defendants,

gug

Bloomsburg, PA 17815, 11 West Main Street FIRST COLUMBIA SAVINGS BANK

Camishee.

### INTERROGATORIES IN ATTACHMENT

(Camishee) Bloomsburg, PA 17815 11 West Main Street FIRST COLUMBIA SAVINGS BANK

# RE: NAOMA THOMAS SS# 172-34-3915

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Benjamin Reich, Esquire Attorney for Plaintiff, AMERICAN BUSINESS CREDIT, INC. cob.sgonmag/lanoariq\_irw/bas/q/samont/abs/lagal/lanaa/sinogs.doc

111 Presidential Boulevard - Suite 215 Benjamin Reich - Attorney No. 54439 AMERICAN BUSINESS CREDIT, INC.

Bala Cynwyd, PA 19004

010) 968-2440

(610) 617-4967 Telecopy

*PMERICAN BUSINESS CREDIT, INC.* 

Suite 215 III Presidential Blvd., Bala Pointe Office Centre

Bala Cynwyd, PA 19004,

Plaintiff,

Bloomsburg, PA 17815, 220 East 3rd Street Q/P/4 MINGS INTERNATIONAL DINING **MECLYN THOMAS** 

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gug

Bloomsburg, PA 17815, 220 East 3rd Street **SAMOHT AMOAN** 

:OT

Defendants,

pue

Bloomsburg, PA 17815, 11 West Main Street FIRST COLUMBIA SAVINGS BANK

Garnishee.

### INTERROGATORIES IN ATTACHMENT

1661- CIJ-011

COURT OF COMMON PLEAS

No. 98-CV-781

TRIAL DIVISION

COLUMBIA COUNTY

Attorney for Plaintiff

(Gamishee) Bloomsburg, PA 17815 11 West Main Street FIRST COLUMBIA SAVINGS BANK

# RE: NAOMA THOMAS SS# 172-34-3915

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Benjamin Reich, Esquire Attorney for Plaintiff, AMERICAN BUSINESS CREDIT, INC. f/shared/legal/abc/thomas/plead/writ\_personal/gamrogs.doc

Benjamin Reich - Attorney No. 54439 YMERICAN BUSINESS CREDIT, INC.

111 Presidential Boulevard - Suite 215

Bala Cynwyd, PA 19004

(010) 968-2440

(610) 617-4967 Telecopy

**YMERICAN BUSINESS CREDIT, INC.** 

III Presidential Blvd., Bala Pointe Office Centre

Suite 215

Bala Cynwyd, PA 19004,

Plaintiff,

Bloomsburg, PA 17815, 220 East 3rd Street Q/P/8 MINGS INTERNATIONAL DINING **MECLYN THOMAS** 

'Λ

guq

Bloomsburg, PA 17815, 550 East 314 Street **SAMOHT AMOAN** 

:OT

Defendants,

pug

Bloomsburg, PA 17815, 11 West Main Street FIRST COLUMBIA SAVINGS BANK

Garnishee.

### INTERROGATORIES IN ATTACHMENT

8551-(27-01/

COURT OF COMMON PLEAS

No. 98-CV-781

TRIAL DIVISION

COLUMBIA COUNTY

Attorney for Plaintiff

(Camishee) Bloomsburg, PA 17815 11 West Main Street FIRST COLUMBIA SAVINGS BANK

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- 5. At any time before or after you were served, did the defendant transfer or deliver any property to you or to any person or place pursuant to your direction or consent and if so what was the consideration therefor?
- 6. At any time after you were served, did you pay, transfer or deliver any money or property to the defendant or to any person or place pursuant to the defendant's direction or otherwise discharge any claim of the defendant against you?
- 7. At the time you were served or at any subsequent time, did you have any safe deposit boxes, pledges, documents of title, securities, notes, coupons, receivables, collateral, checking, savings, tax or other accounts or deposits in which defendant has an interest?

AMERICAN BUSINESS CREDIT, INC. Attorney for Plaintiff,

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AMERICAN BUSINESS CREDIT, INC.

Bala Cynwyd, PA 19004

Bala Cynwyd, PA 19004

Attorney for Plaintiff

COLUMBIA COUNTY

TRIAL DIVISION

ВЬЬ/- (17-0// 181-ЛЭ-86°°N

AMERICAN BUSINESS CREDIT, INC.

Bala Pointe Office Centre 111 Presidential Blvd., Suite 215

(610) 617-4967 Telecopy

010) 998-5440

Suite 215

Bala Cynwyd, PA 19004,

Plaintiff,

Bloomsburg, PA 17815, Alloomsburg, PA 17815, Bloomsburg, PA 17815, Bloomsburg, PA 17815, Bloomsburg, PA 17815, PA 17

٠,

pue

NAOMA THOMAS 550 East 3<sup>rd</sup> Street Bloomsburg PA 178

:OT

Bloomsburg, PA 17815,

Defendants,

pur

FIRST COLUMBIA SAVINGS BANK 11 West Main Street Bloomsburg, PA 17815,

Garnishee.

#### INTERROGATORIES IN ATTACHMENT

FIRST COLUMBIA SAVINGS BANK
11 West Main Street
Bloomsburg, PA 17815
(Gamishee)

# *SE*: NAOMA THOMAS

- 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 a default judgment against you.
- l. At the time you were served or at any subsequent time, did you owe the defendant any money or were you liable to him on any negotiable or other written instrument, or did he claim that you owed him any money or were liable to him for any reason?
- 2. At the time you were served or at any subsequent time, was there in your possession, custody or control or in the joint possession or control or cot
- 3. At the time you were served or at any subsequent time, did you hold legal title to any property of any nature owned solely or in part by the defendant or in which 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 had an interest?
- 5. At any time before or after you were served, did the defendant transfer or deliver any property to you or to any person or place pursuant to your direction or consent and if so what was the consideration therefor?
- 6. At any time after you were served, did you pay, transfer or deliver any money or properly to the defendant or to any person or place pursuant to the defendant's direction or otherwise discharge any claim of the defendant against you?
- At the time you were served or at any subsequent time, did you have any safe deposit boxes, pledges, documents of title, securities, notes, coupons, receivables, collateral, checking, savings, tax or other accounts or deposits in which defendant has an interest?

AMERICAN BUSINESS CREDIT, INC. Attorney for Plaintiff,

f/shared/legal/abc/thomas/plead/writ\_prersonal/garuregs.doc

AMERICAN BUSINESS CREDIT C.	
By: Benjamin Reich - Attorney 54439 111 Presidential Boulevard - Suite 215	
Bala Cynwyd, PA 19004	
(610) 668-2440	
(610) 617-4967 Telecopy	Attorney for Plaintiff
AMERICAN BUSINESS CREDIT, INC.	: COLUMBIA COUNTY
Bala Pointe Office Centre	: COURT OF COMMON PLEAS
111 Presidential Blvd.,	: TRIAL DIVISION
Suite 215 Bala Cynwyd, PA 19004,	. :
Plaintiff,	: :
	:
v.	: No. 98-CV-781
MEGLYN THOMAS	110-ED-1998
d/b/a MINGS INTERNATIONAL DINING	•
550 East 3 <sup>rd</sup> Street	:
Bloomsburg, PA 17815,	:
and	; :
NAONA MIONA	:
NAOMA THOMAS 550 East 3 <sup>rd</sup> Street	:
Bloomsburg, PA 17815,	:
Ottombourg, III 1,015,	· :
Defendants,	:
and	:
	· :
FIRST COLUMBIA SAVINGS BANK	:
11 West Main Street Bloomsburg, PA 17815,	:
Bloomsburg, FA 17813,	: :
Garnishee.	:
	:
CLAIM	FOR EXEMPTION
TO THE SHERIFF:	
TO THE SHERIFF:	
I, the above named defendant, claim exemption	on of property from levy or attachment:
(1) From my personal property in my possessi	ion which has been levied upon,
(a) I desire that my \$300 statutory exe	emption be
[ ] (i) set aside in kind (specif	fy property to be set aside in kind):
[ ] (ii) paid in eash following	the sale of the property levied upon; or
(b) I claim the following exemption (sp	pecify 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 promot court bearing to determine to
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 statements herein are made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.
Date: Defendant:
THIS CLAIM TO BE FILED WITH: Office of the Sheriff of Columbia County 35 West Main Street Bloomsburg, PA 17815 (717) 389-5622
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

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 property, see Rule 3108 (a).

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

### MAJOR EXEMPTIONS UNIT REPENNSYLVANIA AND FEDERAL AW

- (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
- (6) Certain veteran and armed forces benefits
- (7) Certain insurance proceeds
- (8) Such other exemptions as may be provided by law

Bala Cynwyd, PA 19004 (610) 668-2440 (610) 617-4967 Telecopy Attorney for Plaintiff AMERICAN BUSINESS CREDIT, INC. COLUMBIA COUNTY Bala Pointe Office Centre COURT OF COMMON PLEAS 111 Presidential Blvd., TRIAL DIVISION Suite 215 Bala Cynwyd, PA 19004. Plaintiff, ν, No. 98-CV-781 110-ED-1998 MEGLYN THOMAS d/b/a MINGS INTERNATIONAL DINING 550 East 3rd Street Bloomsburg, PA 17815, and NAOMA THOMAS 550 East 3rd Street Bloomsburg, PA 17815, Defendants, and FIRST COLUMBIA SAVINGS BANK 11 West Main Street Bloomsburg, PA 17815, 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 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):

AMERICAN BUSINESS CREDIT 'C.

111 Presidential Boulevard - Suite 215

Benjamin Reich - Attorney ... 54439

(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:
(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. §4904 relating to unsworn falsification to authorities.
Date: Defendant:
THIS CLAIM TO BE FILED WITH: Office of the Sheriff of Columbia County 35 West Main Street Bloomsburg, PA 17815 (717) 389-5622
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 property, see Rule 3108 (a).

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

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- (5) Certain retirement funds
- (6) Certain veteran and armed forces benefits
- (7) Certain insurance proceeds
- (8) Such other exemptions as may be provided by law

AMERICAN BUSINESS CREDIT NC.  By: Benjamin Reich - Attorney No. 54439  111 Presidential Boulevard - Suite 215  Bala Cynwyd, PA 19004	
(610) 668-2440 (610) 617-4967 Telecopy	Attorney for Plaintiff
AMERICAN BUSINESS CREDIT, INC. Bala Pointe Office Centre 111 Presidential Blvd., Suite 215 Bala Cynwyd, PA 19004, Plaintiff,	: COLUMBIA COUNTY : COURT OF COMMON PLEAS : TRIAL DIVISION :
v.  MEGLYN THOMAS d/b/a MINGS INTERNATIONAL DINING 550 East 3 <sup>rd</sup> Street Bloomsburg, PA 17815,	: No. 98-CV-781 : 110-ED-1998 :
NAOMA THOMAS 550 East 3 <sup>rd</sup> Street Bloomsburg, PA 17815,	: : : :
Defendants,	:
and	· :
FIRST COLUMBIA SAVINGS BANK 11 West Main Street Bloomsburg, PA 17815,  Garnishee.	· : : : :
	· :
CLAIM F	OR EXEMPTION
TO THE SHERIFF:	
I, the above named defendant, claim exemption of	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 exemp	otion be
[ ] (i) set aside in kind (specify p	property to be set aside in kind):
[ ] (ii) paid in cash following the	e sale of the property levied upon; or
(b) I claim the following exemption (spec	• • •

AMERICAN BUSINESS CREDIT NC.

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):
request a prompt court hearing to determine the exemption.
Notice of the hearing should be given to me at:
Address)
Гelephone Number)
verify that the statements made in this Claim for Exemption are true and correct. I understant talse statements herein are made subject to the penalties of 18 Pa.C.S. §4904 relating to insworn falsification to authorities.
Date: Defendant:
HIS CLAIM TO BE FILED WITH:  Office of the Sheriff of Columbia County  5 West Main Street

Bloomsburg, PA 17815 (717) 389-5622

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.

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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 property, see Rule 3108 (a).

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

### MAJOR EXEMPTIONS UN ER PENNSYLVANIA AND FEDER! LAW

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- (7) Certain insurance proceeds
- (8) Such other exemptions as may be provided by law

AMERICAN BUSINESS CREDIT, INC.

By: Benjamin Reich - Attorney No. 54439

111 Presidential Boulevard - Suite 215

Bala Cynwyd, PA 19004

(610) 668-2440

(610) 617-4967 Telecopy

Attorney for Plaintiff

COLUMBIA COUNTY

COURT OF COMMON PLEAS

TRIAL DIVISION

AMERICAN BUSINESS CREDIT, INC.

Bala Pointe Office Centre

111 Presidential Blvd.,

Suite 215

Bala Cynwyd, PA 19004,

Plaintiff,

v.

No. 98-CV-781

110-ED-1998

MEGLYN THOMAS d/b/a MINGS INTERNATIONAL DINING 550 East 3<sup>rd</sup> Street Bloomsburg, PA 17815,

and

NAOMA THOMAS 550 East 3<sup>rd</sup> Street Bloomsburg, PA 17815,

Defendants,

and

FIRST COLUMBIA SAVINGS BANK 11 West Main Street Bloomsburg, PA 17815,

Garnishee.

Guillisiico.

#### PETITION TO STRIKE JUDGMENT

#### REQUEST FOR PROMPT HEARING

I hereby certify that I did not voluntarily, intelligently and knowingly give up my right to notice and hearing prior to the entry of judgment. I petition the court to strike the judgment on this ground and request a prompt hearing on this issue.

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

Telephone Number	
City, State	
Street Address	

AMERICAN BUSINESS CREDIT, INC.

By: Benjamin Reich - Attorney No. 54439

111 Presidential Boulevard - Suite 215

Bala Cynwyd, PA 19004

(610) 668-2440

(610) 617-4967 Telecopy

AMERICAN BUSINESS CREDIT, INC.

Bala Pointe Office Centre

111 Presidential Blvd.,

Suite 215

Bala Cynwyd, PA 19004,

Plaintiff,

v.

MEGLYN THOMAS d/b/a MINGS INTERNATIONAL DINING 550 East 3<sup>rd</sup> Street Bloomsburg, PA 17815,

and

NAOMA THOMAS 550 East 3<sup>rd</sup> Street Bloomsburg, PA 17815,

Defendants,

and

FIRST COLUMBIA SAVINGS BANK 11 West Main Street Bloomsburg, PA 17815,

Garnishee.

Attorney for Plaintiff

COLUMBIA COUNTY
COURT OF COMMON PLEAS
TRIAL DIVISION

No. 98-CV-781

110-ED-1998

#### PETITION TO STRIKE JUDGMENT

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Notice	of the hearing should be given to m	e at	
	Street Address		
	City, State		
	Telephone Number		•
Dated:		-	
f:\sharedlegaf\abc\tho	omas\plead\writ_personal\strkjmt.doc	Defendant(s)	

AMERICAN BUSINESS CREDIT, INC.

By: Benjamin Reich - Attorney No. 54439

111 Presidential Boulevard - Suite 215

Bala Cynwyd, PA 19004

(610) 668-2440

(610) 617-4967 Telecopy

Attorney for Plaintiff

COLUMBIA COUNTY
COURT OF COMMON PLEAS

TRIAL DIVISION

AMERICAN BUSINESS CREDIT, INC.

Bala Pointe Office Centre

111 Presidential Blvd.,

Suite 215

Bala Cynwyd, PA 19004,

Plaintiff,

v.

No. 98-CV-781

110-ED-1998

MEGLYN THOMAS

d/b/a MINGS INTERNATIONAL DINING

550 East 3<sup>rd</sup> Street

Bloomsburg, PA 17815,

and

NAOMA THOMAS

550 East 3rd Street

Bloomsburg, PA 17815,

Defendants,

and

FIRST COLUMBIA SAVINGS BANK

11 West Main Street

Bloomsburg, PA 17815,

Garnishee.

REQUEST FOR PROMPT HEARING

PETITION TO STRIKE JUDGMENT

I hereby certify that I did not voluntarily, intelligently and knowingly give up my right to notice and hearing prior to the entry of judgment. I petition the court to strike the judgment on this ground and request a prompt hearing on this issue.

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Street Address	
City, State	
Telephone Number	<u> </u>

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AMERICAN BUSINESS CREDIT, INC.

By: Benjamin Reich - Attorney No. 54439

111 Presidential Boulevard - Suite 215

Bala Cynwyd, PA 19004

(610) 668-2440

(610) 617-4967 Telecopy

Attorney for Plaintiff

TRIAL DIVISION

COLUMBIA COUNTY

COURT OF COMMON PLEAS

AMERICAN BUSINESS CREDIT, INC.

Bala Pointe Office Centre

111 Presidential Blvd.,

Suite 215

Bala Cynwyd, PA 19004,

:

: No. 98-CV-781

110-ED 1998

v.

MEGLYN THOMAS d/b/a MINGS INTERNATIONAL DINING 550 East 3<sup>rd</sup> Street Bloomsburg, PA 17815,

and

NAOMA THOMAS 550 East 3<sup>rd</sup> Street Bloomsburg, PA 17815,

Defendants,

Plaintiff,

and

FIRST COLUMBIA SAVINGS BANK 11 West Main Street Bloomsburg, PA 17815,

Garnishee.

....

Notice Under Rule 2958.3 of Judgment and Execution Thereon

Notice of Defendant's Rights

TO: MEGLYN THOMAS

d/b/a MINGS INTERNATIONAL DINING

550 East 3rd Street

Bloomsburg, PA 17815

A judgment in the amount of \$71,713.98 has been entered against you and in favor of the plaintiff without any prior notice or hearing based on a confession of judgment contained in a written agreement or other paper allegedly signed by you. The court has issued a writ of execution which directs the sheriff to take your money or other property owned by you to pay the judgment.

If your money or property has been taken, you have the right to get the money or property back if you did not voluntarily, intelligently and knowingly give up your constitutional right to notice and hearing prior to the entry of judgment or if you have defenses or other valid objections to the judgment.

You have a right to a prompt court hearing if you claim that you did not voluntarily, intelligently and knowingly give up your rights to notice and hearing prior to the entry of the judgment. If you wish to exercise this right, you must immediately fill out and sign the petition to strike the judgment which accompanies the writ of execution and deliver it to the Sheriff of Columbia County at 35 West Main Street, Bloomsburg, PA 18715.

IT IS IMPORTANT THAT YOU ACT PROMPTLY. IT WILL BE TOO LATE TO REGAIN YOUR PROPERTY IF YOU WAIT UNTIL AFTER THE PROPERTY HAS BEEN SOLD BY THE SHERIFF OR TURNED OVER TO THE PLAINTIFF.

YOU MUST FILE A PETITION SEEKING RELIEF FROM THE JUDGMENT AND PRESENT IT TO A JUDGE WITHIN THIRTY (30) DAYS AFTER THE DATE ON WHICH THIS NOTICE IS SERVED ON YOU OR YOU MAY LOSE YOUR RIGHTS.

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:

SUSQUEHANNA LEGAL SERVICES 168 EAST 5<sup>TH</sup> STREET BLOOMSBURG, PA 17815 (717) 784-8760

> Benjamin Reich, Esquire Attorney for Plaintiff,

American Business Credit, Inc.

BalaPointe Office Centre 111 Presidential Boulevard

Suite 215

Bala Cynwyd, PA 19004

(610) 668-2440

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AMERICAN BUSINESS CREDIT, INC.

By: Benjamin Reich - Attorney No. 54439

111 Presidential Boulevard - Suite 215

Bala Cynwyd, PA 19004

(610) 668-2440

(610) 617-4967 Telecopy

Attorney for Plaintiff

: COLUMBIA COUNTY

COURT OF COMMON PLEAS

TRIAL DIVISION

AMERICAN BUSINESS CREDIT, INC.

Bala Pointe Office Centre

111 Presidential Blvd.,

Suite 215

Bala Cynwyd, PA 19004,

Plaintiff.

v.

No. 98-CV-781

110-ED 1998

MEGLYN THOMAS d/b/a MINGS INTERNATIONAL DINING 550 East 3<sup>rd</sup> Street

and

NAOMA THOMAS 550 East 3<sup>rd</sup> Street Bloomsburg, PA 17815,

Bloomsburg, PA 17815,

Defendants,

and

FIRST COLUMBIA SAVINGS BANK

11 West Main Street

Bloomsburg, PA 17815,

Garnishee.

Notice Under Rule 2958.3 of Judgment and Execution Thereon

Notice of Defendant's Rights

TO: MEGLYN THOMAS

d/b/a MINGS INTERNATIONAL DINING

550 East 3rd Street

Bloomsburg, PA 17815

A judgment in the amount of \$71,713.98 has been entered against you and in favor of the plaintiff without any prior notice or hearing based on a confession of judgment contained in a written agreement or other paper allegedly signed by you. The court has issued a writ of execution which directs the sheriff to take your money or other property owned by you to pay the judgment.

If your money or property has been taken, you have the right to get the money or property back if you did not voluntarily, intelligently and knowingly give up your constitutional right to notice and hearing prior to the entry of judgment or if you have defenses or other valid objections to the judgment.

You have a right to a prompt court hearing if you claim that you did not voluntarily, intelligently and knowingly give up your rights to notice and hearing prior to the entry of the judgment. If you wish to exercise this right, you must immediately fill out and sign the petition to strike the judgment which accompanies the writ of execution and deliver it to the Sheriff of Columbia County at 35 West Main Street, Bloomsburg, PA 18715.

IT IS IMPORTANT THAT YOU ACT PROMPTLY. IT WILL BE TOO LATE TO REGAIN YOUR PROPERTY IF YOU WAIT UNTIL AFTER THE PROPERTY HAS BEEN SOLD BY THE SHERIFF OR TURNED OVER TO THE PLAINTIFF.

YOU MUST FILE A PETITION SEEKING RELIEF FROM THE JUDGMENT AND PRESENT IT TO A JUDGE WITHIN THIRTY (30) DAYS AFTER THE DATE ON WHICH THIS NOTICE IS SERVED ON YOU OR YOU MAY LOSE YOUR RIGHTS.

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:

SUSQUEHANNA LEGAL SERVICES 168 EAST 5<sup>TH</sup> STREET BLOOMSBURG, PA 17815 (717) 784-8760

> Benjamin Reich, Esquire Attorney for Plaintiff,

American Business Credit, Inc.

BalaPointe Office Centre 111 Presidential Boulevard

Suite 215

Bala Cynwyd, PA 19004

(610) 668-2440

Dollars S \*\*\*\*\*\*100.00 MEMO: LN#1757 THOMAS AMERICAN BUSINESS CREDIT. INC. NOT VALID AFTER 6 MONTHS 3.1/510 017568 AUTHORIZED SIGNATURE ONE HUNDRED AND 00/100\* CHECK DATE: 12/07/98 CORESTATES BANK PHILADELPHIA, PA 19101 SHERIFF OF COLUMBIA COUNTY AMERICAN BUSINESS CREDIT, INC. V000001877 BALAPOIATE OFFICE CENTRE 111 PRESIDENTIAL BLVD., SUITE 215 17815 35 WEST MAIN STREET BALA CYNWYD, PA 19004 BLOOMSBURG PA PAY TO THE ORDER OF REFERENCE:

#017568# ::031000014: 1950#7084#

# WRIT OF EXECUTION - (MONEY JUDGEMENTS) Rules P.R.C.P. 3101 to 3149

,	
.American .Business Credit, Inc., Plaintiff,	No98-CV-781 Term 1998 .E.D.
v. .Meglyn. Thomas .d/b/a.Mings. Internationa Dining	
and Naoma Thomas,	No
Defendants, and	WRIT OF EXECUTION (MONEY JUDGEMENTS)
First Columbia Savings Bank, Garnishee.	CONFESSED JUDGMENT
COMMONWEALTH OF PENNSYLVAN	IA, COUNTY OFcolumbia
TO THE SHERIFF OF . COLUMBIA	
To satisfy the judgement, interest and costs aga	instMeglyn.Thomas.d/b/a.Mings.International
Dining and Naoma Thomas	Defendant (s);
(1) You are directed to levy upon the property of the defendant (s) and to sell his, her (or their) interest therein; (Inquisition and Exemption Laws waived and Condemnation agreed to)  (2) You are also directed to attach the property of the defendant not levied upon in the possession	
of .First Columbia Savings Bank, 11 West Main Street, Bloomsburg, PA 17815	
(Specifically describe property)	
See attached Exh	ibit A
Jakofy # 5.00	
And \$ 15.00 pel	
Datofy \$ 5.00	
	•
and to notify the Garnishee (s) that  (a) an attachment has been issued;  (b) 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.  (3) If the 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 him that he has been added as a garnishee and is enjoined as above stated.	
· · · · · · · · · · · · · · · · · · ·	Amount due \$.71,713.98
	Interest from 6/16/98
	(per diem \$47.80 at 24%) Total
, i	Plus costs as per endorsement hereon.
Dated 13 09 1995	Prothonotary, Court of Common Pleas of Columbia County, Penna.
(SHAL)	( o : A : The a : Box on )

## WRIT OF EXECUTION - (MONEY JUDGEMENTS) Rules P.R.C.P. 3101 to 3149

•	
.American Business Credit, Inc., Plaintiff,	, No98 <del>.</del> CV-781, Тегт 1998E.D.
.Meglyn.Thomas.d/b/a.Mings.Internationa Dining	No
Naoma Thomas,	No
Defendants,	WRIT OF EXECUTION (MONEY JUDGEMENTS)
First Columbia Savings Bank, Garnishee.	CONFESSED JUDGMENT
COMMONWEALTH OF PENNSYLVAN	IA, COUNTY OFCOLUMBIA
TO THE SHERIFF OF . COLUMBIA	COUNTY, PENNA.
To satisfy the judgement, interest and costs aga	instMeglyn.Thomas.d/b/a.Mings.International
Dining and Naoma Thomas	Defendant (s);
mercin, (industrion and txemption caws waived at	of the defendant (s) and to sell his, her (or their) interest nd Condemnation agreed to) of the defendant not levied upon in the possession
ofFirst Columbia Savings Bank, 11 Wes	
(Specifically	describe property)
See attached Exh	ibit A
middle party 6000	
Var 4 15.00 pcc	
Jacoby # 5.00	
•	
•	
and to notify the Garnishee (s) that	•
(3) If the property of the defendant not levied upon	wise disposing thereof.  on and subject to attachment is found in the possession are directed to notify him that he has been added as a
gammones and is enjoined as above stated.	Amount due \$71,713.98
	***************************************
	Interest from 6/16/98
	Plus costs as per endorsement hereon.
Dated 12/04/1498	Prothonotary, Court of Common Pleas of
(SEAIL)	Columbia County, Penna.