

John M. Downs
Plumbing, Heating & Water Treatment
Residential • Commercial
320 West Main Street
Bloomsburg, PA 17815
(717) 784-5900



FAX (717) 387-1006

FAX COMMUNICATION

ATTN: HARRY

COMPANY: _____

FROM: John m Downs

DATE: 3-10-99

NUMBER OF PAGES: 3 (INCLUDES COVER)

HARRY,

IF THIS IS NOT THE PROPER
ORDER YOU NEED TO HALT THE
SHERIFF'S SALE, PLEASE CALL.

Satisfied 5-30-99 JC

LAW OFFICES

MORRIS & ADELMAN, P.C.

ROBERT I. MORRIS
JAMES W. ADELMAN
KENNETH P. CAROBUS
ROBERT M. MORRIS *

COUNSELL TO THE FIRM
HORACE A. STERN

*ALSO ADMITTED TO PRACTICE
CALIFORNIA AND NEW JERSEY

1920 CHESTNUT STREET • SUITE 400
P.O. BOX 30477
PHILADELPHIA, PA 19103

215-568-5621
800-745-8058
FAX: 215-568-3253

BERKS COUNTY PHONE
610-373-2873

BUCKS COUNTY PHONE
215-348-5000

DELAWARE COUNTY PHONE
610-446-0116

MONTGOMERY COUNTY PHONE
215-886-1500

March 8, 1999

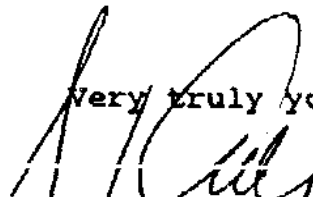
John M. Downs
John M. Downs Plumbing & Htg.
320 West Main Street
Bloomsburg, PA 17815-1661

RE: Hajoca Corporation
VS: John M. Downs Plumbing & Htg.
Please refer to our File No. 943092

Gentlemen:

Enclosed please find the Order you requested. Thank you for
your cooperation.

Very truly yours,



Encl.

MORRIS & ADELMAN, P.C.
BY: JAMES W. ADELMAN, ESQUIRE
IDENTIFICATION #02604
P.O. Box 30477
Philadelphia, Pennsylvania 19103-8477
(215) 568-5621

ATTORNEY FOR PLAINTIFF

Hajoca Corporation

Hajoca Corporation
950 Township Line Road
Chester, PA 19013-1316

COURT OF COMMON PLEAS
COLUMBIA COUNTY
CIVIL DIVISION

vs.

John M. Downs indiv & ta John M.
Downs Plumbing & Heating
320 West Main Street
Bloomsburg PA 17815-1661

NO. 98-CV-1323

MAR 3 10 29 AM '99

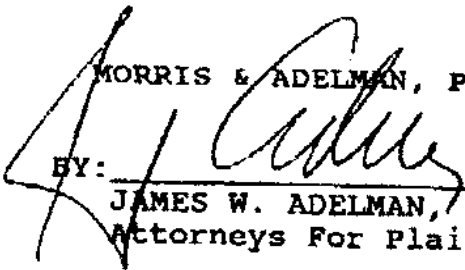
CLERK OF COURT

ORDER TO SATISFY JUDGMENT

TO THE PROTHONOTARY:

Please mark the judgment in the above-entitled case satisfied upon payment of your costs only.

MORRIS & ADELMAN, P.C.

BY: 
JAMES W. ADELMAN, ESQUIRE
Attorneys For Plaintiff

So Ordered As Above:


Prothonotary

HARRY A. ROADARMEL, JR.



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

PHONE
(570) 389-5622

24 HOUR PHONE
(570) 784-6300

IN THE COURT OF COMMON PLEAS
OF COLUMBIA COUNTY, COMMON-
WEALTH OF PENNSYLVANIA.

HAJOCA CORPORATION

VS.

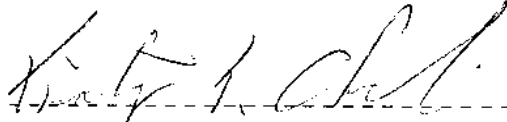
DOWNNS, JOHN

WRIT OF EXECUTION 98- SMF-000113

POSTING OF PROPERTY

TUESDAY MARCH 9, 1999 POSTED A COPY OF THE SHERIFF'S SALE
BILL ON THE PROPERTY OF DOWNNS, JOHN BY TAPING A
COPY OF THE SALE BILL TO THE FRONT DOOR AT
320 W MAIN ST BLOOMSBURG, PA, 17815

SO ANSWERS:

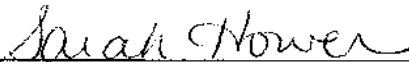


TIMOTHY T. CHAMBERLAIN
CHIEF DEPUTY SHERIFF

HARRY A ROADARMEL JR
SHERIFF

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 11TH OF MARCH 1998



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

HARRY A. ROADARMEL, JR.



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

PHONE
(570) 389-5622

24 HOUR PHONE
(570) 784-6300

IN THE COURT OF COMMON PLEAS
OF COLUMBIA COUNTY, COMMON-
WEALTH OF PENNSYLVANIA.

HAJOCA CORPORATION

VS.

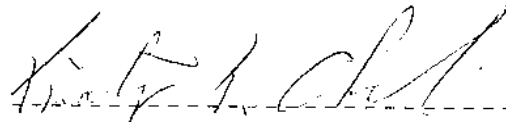
DOWNS, JOHN

WRIT OF EXECUTION 98- SMF-000113

POSTING OF PROPERTY

TUESDAY MARCH 9, 1999 POSTED A COPY OF THE SHERIFF'S SALE
BILL ON THE PROPERTY OF DOWNS, JOHN BY TAPING A
COPY OF THE SALE BILL TO THE FRONT DOOR AT
320 W MAIN ST BLOOMSBURG, PA, 17815

SO ANSWERS:

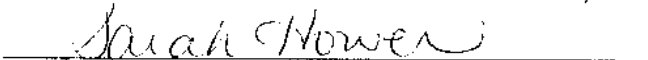


TIMOTHY T. CHAMBERLAIN
CHIEF DEPUTY SHERIFF

HARRY A ROADARMEL JR
SHERIFF

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 11TH OF MARCH 1998



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

SHERIFF'S SALE

BY VIRTUE OF WRIT OF EXECUTION 98- SMF-000113 TO ME DIRECTED
BY THE COURTS, THERE WILL BE SOLD AT PUBLIC SALE, ON
WEDNESDAY MARCH 31, 1999 AT 10 : 00 O'CLOCK A M AT
THE PLACE 320 W MAIN ST
BLOOMSBURG, PA, 17815 IN THE TOWN
OF BLOOMSBURG COUNTY OF COLUMBIA AND STATE OF
PENNSYLVANIA, THE FOLLOWING ARTICLES OF PERSONAL PROPERTY, TO WIT:

1988 CHEVY TRUCK

REG# YT95430

1988 GMC TRUCK

REG# *Y 52584*

TOGETHER WITH ALL OTHER ARTICLES FOUND AND BELONGING TO THE
DEFENDANT(S) AND NOT ENUMBERATED:

SEIZED AND TAKEN INTO EXECUTION AS THE PROPERTY OF
DOWNS, JOHN AT 320 W MAIN ST
BLOOMSBURG, PA, 17815

AND TO BE SOLD BY HARRY A ROADARMEL JR, SHERIFF OF COLUMBIA
COUNTY, BLOOMSBURG, PA 17815 (717-389-5622).

HARRY A. ROADARMEL, JR.



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

PHONE
(570) 389-5622

24 HOUR PHONE
(570) 784-6300

HAJOCA CORPORATION

98- SMF-000113

VS

WRIT OF EXECUTION

JOHN M. DOWNS PLUMBING & HEAT.

SHERIFF'S COST\$

NOW, _____, I, HON. HARRY A. ROADARMEL JR.
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, TUESDAY FEBRUARY 2, 1999, AT 12 : 45 O'CLOCK P M, SERVED
THE WITHIN WRIT OF EXECUTION UPON
JOHN M. DOWNS PLUMBING & HEAT. AT 320 W MAIN ST
BLOOMSBURG, PA
BY HANDING TO JOHN DOWMS A TRUE AND ATTESTED COPY
OF THE ORIGINAL WRIT AND MADE KNOWN TO HIM THE CONTENTS THEREOF.

SO ANSWERS,

SWORN AND SUBSCRIBED BEFORE ME
THIS 3RD DAY OF FEBRUARY 1999

SHERIFF HARRY A. ROADARMEL JR.
COLUMBIA COUNTY SHERIFF

Sarah Hower

NOTARY PUBLIC
SARAH HOWER

Timothy T. Chamberlain

CHIEF DEPUTY SHERIFF
TIMOTHY T. CHAMBERLAIN

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

HARRY A. ROADARMEL, JR.



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

PHONE
(570) 389-5622

24 HOUR PHONE
(570) 784-6300

HAJOCA CORPORATION

98- SMF-000113

VS

WRIT OF EXECUTION

DOWNS, JOHN

SHERIFF'S COST\$

NOW, _____, I, HON. HARRY A. ROADARMEL JR.
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, TUESDAY FEBRUARY 2, 1999, AT 12 : 45 O'CLOCK P M, SERVED
THE WITHIN WRIT OF EXECUTION UPON
JOHN DOWNS AT 320 WEST MAIN ST
BLOOMSBURG, PA
BY HANDING TO JOHN DOWNS A TRUE AND ATTESTED COPY
OF THE ORIGINAL WRIT AND MADE KNOWN TO HIM THE CONTENTS THEREOF.

SO ANSWERS,

SWORN AND SUBSCRIBED BEFORE ME
THIS 3RD DAY OF FEBRUARY 1999

SHERIFF HARRY A. ROADARMEL JR.
COLUMBIA COUNTY SHERIFF

Sarah Hower

NOTARY PUBLIC
SARAH HOWER

Timothy T. Chamberlain

CHIEF DEPUTY SHERIFF
TIMOTHY T. CHAMBERLAIN

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

HARRY A. ROADARMEL, JR.



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

PHONE
(570) 389-5622

24 HOUR PHONE
(570) 784-6300

HAJOCA CORPORATION

98- SMF-000113

VS

INTERROGATORIES

1ST COLUMBIA BANK & TRUST

SHERIFF'S COST\$

NOW, _____, I, HON. HARRY A. ROADARMEL JR.
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, TUESDAY FEBRUARY 2, 1999, AT 10 : 20 O'CLOCK A M, SERVED
THE WITHIN INTERROGATORIES UPON
1ST COLUMBIA BANK & TRUST AT 1016 WEST FRONT ST
BERWICK, PA
BY HANDING TO SHANNON HUNSINGER, CUST. SERV. A TRUE AND ATTESTED COPY
OF THE ORIGINAL WRIT AND MADE KNOWN TO HER THE CONTENTS THEREOF.

SO ANSWERS,

SWORN AND SUBSCRIBED BEFORE ME
THIS 3RD DAY OF FEBRUARY 1999

SHERIFF HARRY A. ROADARMEL JR.
COLUMBIA COUNTY SHERIFF

Sarah Hower

NOTARY PUBLIC
SARAH HOWER

Timothy T. Chamberlain

CHIEF DEPUTY SHERIFF
TIMOTHY T. CHAMBERLAIN

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

SHERIFF'S SALE

BY VIRTUE OF WRIT OF EXECUTION 98- SMF-000113 TO ME DIRECTED
BY THE COURTS, THERE WILL BE SOLD AT PUBLIC SALE, ON
WEDNESDAY MARCH 31, 1999 AT 10 : 00 O'CLOCK A M AT
THE PLACE 320 W MAIN ST
BLOOMSBURG, PA, 17815 IN THE TOWM
OF BLOOMSBURG COUNTY OF COLUMBIA AND STATE OF
PENNSYLVANIA, THE FOLLOWING ARTICLES OF PERSONAL PROPERTY, TO WIT:

1988 CHEVY TRUCK

REG# YT95430

1988 GMC TRUCK

REG# *15 52584*

TOGETHER WITH ALL OTHER ARTICLES FOUND AND BELONGING TO THE
DEFENDANT(S) AND NOT ENUMBERATED:

SEIZED AND TAKEN INTO EXECUTION AS THE PROPERTY OF
DOWNS, JOHN AT 320 W MAIN ST
BLOOMSBURG, PA, 17815

AND TO BE SOLD BY HARRY A ROADARMEL JR, SHERIFF OF COLUMBIA
COUNTY, BLOOMSBURG, PA 17815 (717-389-5622).

LAW OFFICES

MORRIS & ADELMAN, P.C.

ROBERT I. MORRIS
JAMES W. ADELMAN
KENNETH F. CAROBUS
ROBERT M. MORRIS *

COUNSEL TO THE FIRM
HORACE A. STERN

* ALSO ADMITTED TO PRACTICE
CALIFORNIA AND NEW JERSEY

1920 CHESTNUT STREET • SUITE 400
P.O. BOX 30477
PHILADELPHIA, PA 19103

215-568-5621
800-745-8058
FAX: 215-568-3253

BERKS COUNTY PHONE
610-373-2873

BUCKS COUNTY PHONE
215-348-5000

DELAWARE COUNTY PHONE
610-446-0116

MONTGOMERY COUNTY PHONE
215-886-1500

January 27, 1999

Sheriff of Columbia County
Columbia County Courthouse
Courthouse P.O. Box 380
Bloomsburg, PA 17815

Case Name: Hajoca Corporation
vs: John M. Downs indiv & ta John M. Downs
Plumbing & Heating
320 West Main Street
Bloomsburg PA 178151661
Case No: 98-CV-1323
Our file no. 943092

Dear Sirs:

To date, we have not received any indication from your office that service of the Writ of Execution for personal property levy has been made or attempted. Please advise when a return of levy will be filed. A prestamped business reply envelope is provided for your reply. Thank you.

Very truly Yours,


JAMES W. ADELMAN

Encl.

LAW OFFICES

MORRIS & ADELMAN, P.C.

ROBERT I. MORRIS
JAMES W. ADELMAN
KENNETH F. CAROLUS
ROBERT M. MORRIS *

1920 CHESTNUT STREET • SUITE 400
P.O. BOX 30477
PHILADELPHIA, PA 19103

215-568-5621
800-745-8058
FAX: 215-568-3253

BERKS COUNTY PHONE
610-373-2873

BUCKS COUNTY PHONE
215-348-5000

DELAWARE COUNTY PHONE
610-446-0116

MONTGOMERY COUNTY PHONE
215-886-1500

COUNSEL TO THE FIRM
HORACE A. STERN

* ALSO ADMITTED TO PRACTICE
CALIFORNIA AND NEW JERSEY

December 21, 1998

Prothonotary of Columbia County
Columbia County Court House
P.O. Box 380
Bloomsburg, PA 17815

RE: HAJOCA CORPORATION
VS: JOHN M. DOWNS ind. & t/a JOHN M. DOWNS
PLUMBING & HEATING and FIRST COLUMBIA
BANK & TRUST, Garnishee
NO. 98-CV-1323
Our file no.# 943092

DEC 21 1998 17 00

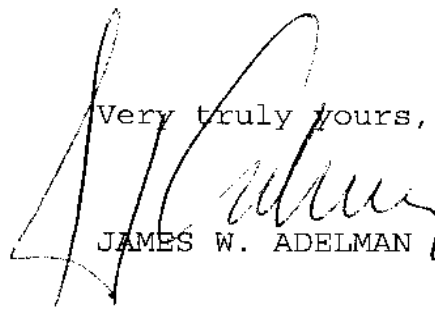
Dear Sir or Madam:

Enclosed herewith please find the following in connection with the above-captioned matter:

1. Original Praecipe for Writ of Execution.
2. Additional copy of the Praecipe to be time-stamped and returned to this office.
3. Original and three (3) copies of Writ of Execution.
4. Affidavit.
5. Original and three (3) copies of Interrogatories.
6. Order for Service.
7. Check made payable to your order in the amount of \$15.00.
8. Check made payable to the Sheriff of Columbia County in the amount of \$200.00, covering the fee for service.

We have enclosed a self-addressed stamped envelope for your convenience.

Very truly yours,



JAMES W. ADELMAN

/pm
Encl.

MORRIS & ADELMAN, P.C.

BY: JAMES W. ADELMAN, ESQUIRE

Attorney for Plaintiff

IDENTIFICATION # 02604

1920 Chestnut Street, Suite 400

P.O. Box 30477

Philadelphia, Pennsylvania 19103-8477

(215) 568-5621

HAJOCA CORPORATION
950 Township Line Road
Chester, PA 19013

COLUMBIA COUNTY
COURT OF COMMON PLEAS
CIVIL DIVISION

v.

JOHN M. DOWNS ind. & t/a JOHN M.
DOWNS PLUMBING & HEATING
320 West Main Street
Bloomsburg, PA 17815

NO. 98-CV-1323

113-ED-1998

COMMONWEALTH OF PENNSYLVANIA:

COUNTY OF PHILADELPHIA:

AFFIDAVIT

JAMES W. ADELMAN, _____, Esquire, being duly sworn and is authorized to take this affidavit on behalf; that the defendant JOHN M. DOWNS Ind. & t/a JOHN M. DOWNS, PLUMBING & HEATING, is a Pennsylvania corporation, and that the foregoing is true and correct to the best of his knowledge, information and belief.

[Signature]

JAMES W. ADELMAN, Esquire

Sworn To and Subscribed
Before Me This *21st* Day
of *December*, 199*8*.

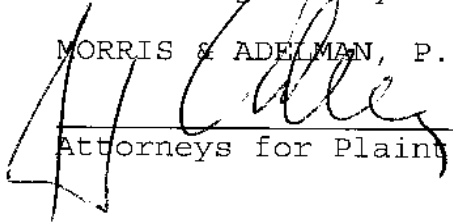
Patricia A. McKenzie

Notarial Seal
Patricia A. McKenzie, Notary Public
Philadelphia, Philadelphia County
My Commission Expires Feb. 21, 2000
Member, Pennsylvania Association of Notaries

You are hereby notified to plead to the enclosed Interrogatories within twenty (20) days from service hereon or a default judgment may be entered against you.

MORRIS & ADELMAN, P.C.
BY: JAMES W. ADELMAN, ESQUIRE
IDENTIFICATION # 02604
1920 Chestnut Street, S/400
P.O. Box 30477
Philadelphia, PA 19103-8477
(215) 568-5621

MORRIS & ADELMAN, P.C.


Attorneys for Plaintiff

HAJOCA CORPORATION : COURT OF COMMON PLEAS
950 Township Line Road : COLUMBIA COUNTY
Chester, PA 19013 : CIVIL DIVISION

vs.

JOHN M. DOWNS ind. & t/a JOHN M. :
DOWNS PLUMBING & HEATING :
320 West Main Street :
Bloomsburg, PA 17815 and :
FIRST COLUMBIA BANK & TRUST CO. :
Garnishee : NO. 98-CV-1323

113 ED-1998

INTERROGATORIES TO GARNISHEE

TO: FIRST COLUMBIA BANK & TRUST CO.
1016 West Front Street
Berwick, PA 18603
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 any money or were you liable to it on any negotiable or other written instrument, or did it claim that you owed it any money or were liable to it for any reasons? State the amount specifically.

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 others, any property of any nature owned solely or in part by the Defendant? If your answer is in the affirmative, describe the nature and value of said property.

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? If your answer is in the affirmative, describe the nature and value of said property.

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? If your answer is in the affirmative, describe the nature and value of said property.

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 what was the consideration there for?

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 its direction or otherwise discharge any claim of the Defendant against you? If your answer is in the affirmative, set forth dates and amounts specifically.

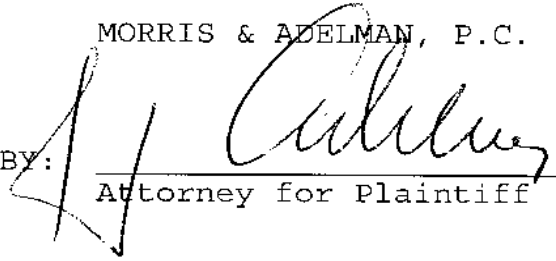
7. Did the Garnishee ever have an account of any type with the Defendant:

8. If the answer to the preceding interrogatory is in the affirmative, state with regard to each account:

- (a) Identify all documents that were given to the Bank or signed for the Bank establishing the account.
- (b) State the Bank's understanding of the legal composition of its customer and identify all documents the Bank has that showed that legal composition.
- (c) State all addresses given for the Bank's customer and all addresses to which the account statements were to be sent.

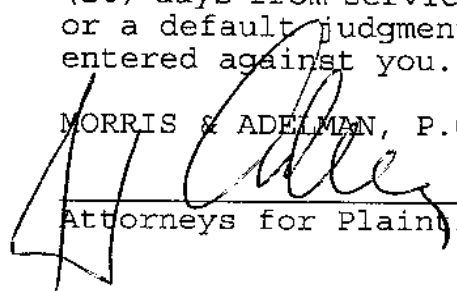
MORRIS & AZELMAN, P.C.

BY:


Attorney for Plaintiff

You are hereby notified to plead to the enclosed Interrogatories within twenty (20) days from service hereon or a default judgment may be entered against you.

MORRIS & ADELMAN, P.C.


Attorneys for Plaintiff

MORRIS & ADELMAN, P.C.
BY: JAMES W. ADELMAN, ESQUIRE
IDENTIFICATION # 02604
1920 Chestnut Street, S/400
P.O. Box 30477
Philadelphia, PA 19103-8477
(215) 568-5621

HAJOCA CORPORATION
950 Township Line Road
Chester, PA 19013

COURT OF COMMON PLEAS
COLUMBIA COUNTY
CIVIL DIVISION

vs.

JOHN M. DOWNS ind. & t/a JOHN M.
DOWNS PLUMBING & HEATING
320 West Main Street
Bloomsburg, PA 17815 and
FIRST COLUMBIA BANK & TRUST CO.
Garnishee

NO. 98-CV-1323

113-ED-1998

INTERROGATORIES TO GARNISHEE

TO: FIRST COLUMBIA BANK & TRUST CO.
1016 West Front Street
Berwick, PA 18603
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 any money or were you liable to it on any negotiable or other written instrument, or did it claim that you owed it any money or were liable to it for any reasons? State the amount specifically.

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 others, any property of any nature owned solely or in part by the Defendant? If your answer is in the affirmative, describe the nature and value of said property.

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? If your answer is in the affirmative, describe the nature and value of said property.

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? If your answer is in the affirmative, describe the nature and value of said property.

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 what was the consideration there for?

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 its direction or otherwise discharge any claim of the Defendant against you? If your answer is in the affirmative, set forth dates and amounts specifically.

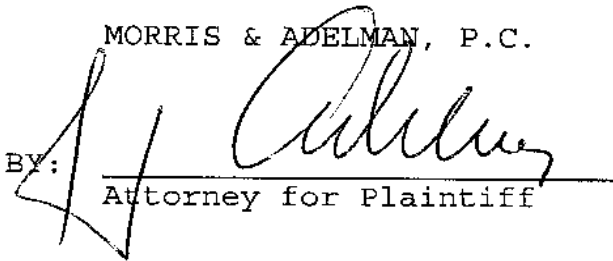
7. Did the Garnishee ever have an account of any type with the Defendant:

8. If the answer to the preceding interrogatory is in the affirmative, state with regard to each account:

- (a) Identify all documents that were given to the Bank or signed for the Bank establishing the account.
- (b) State the Bank's understanding of the legal composition of its customer and identify all documents the Bank has that showed that legal composition.
- (c) State all addresses given for the Bank's customer and all addresses to which the account statements were to be sent.

MORRIS & ADELMAN, P.C.

BY:


Attorney for Plaintiff

You are hereby notified to plead to the enclosed Interrogatories within twenty (20) days from service hereon or a default judgment may be entered against you.

MORRIS & ADELMAN, P.C.

Attorneys for Plaintiff

MORRIS & ADELMAN, P.C.
BY: JAMES W. ADELMAN, ESQUIRE
IDENTIFICATION # 02604
1920 Chestnut Street, S/400
P.O. Box 30477
Philadelphia, PA 19103-8477
(215) 568-5621

HAJOCA CORPORATION
950 Township Line Road
Chester, PA 19013

COURT OF COMMON PLEAS
COLUMBIA COUNTY
CIVIL DIVISION

vs.

JOHN M. DOWNS ind. & t/a JOHN M.
DOWNS PLUMBING & HEATING
320 West Main Street
Bloomsburg, PA 17815 and
FIRST COLUMBIA BANK & TRUST CO.
Garnishee

NO. 98-CV-1323

113 ED 1998

INTERROGATORIES TO GARNISHEE

TO: FIRST COLUMBIA BANK & TRUST CO.
1016 West Front Street
Berwick, PA 18603
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 any money or were you liable to it on any negotiable or other written instrument, or did it claim that you owed it any money or were liable to it for any reasons? State the amount specifically.

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 others, any property of any nature owned solely or in part by the Defendant? If your answer is in the affirmative, describe the nature and value of said property.

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? If your answer is in the affirmative, describe the nature and value of said property.

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? If your answer is in the affirmative, describe the nature and value of said property.

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 what was the consideration there for?

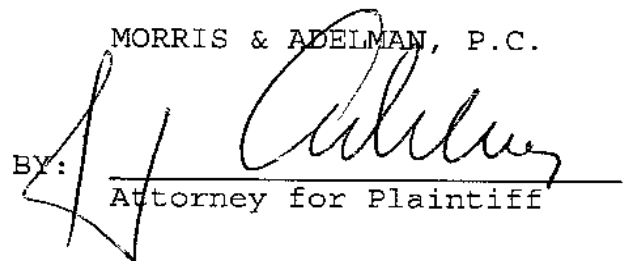
6. At any time after you were served, did you pay, transfer, or deliver any money or property to the Defendant or to any person or place pursuant to its direction or otherwise discharge any claim of the Defendant against you? If your answer is in the affirmative, set forth dates and amounts specifically.

7. Did the Garnishee ever have an account of any type with the Defendant:

8. If the answer to the preceding interrogatory is in the affirmative, state with regard to each account:

- (a) Identify all documents that were given to the Bank or signed for the Bank establishing the account.
- (b) State the Bank's understanding of the legal composition of its customer and identify all documents the Bank has that showed that legal composition.
- (c) State all addresses given for the Bank's customer and all addresses to which the account statements were to be sent.

MORRIS & ADELMAN, P.C.

BY:  _____
Attorney for Plaintiff

ORDER FOR SERVICE

(ALL INFORMATION FROM ATTORNEY MUST BE FILLED IN BEFORE SERVICE CAN BE MADE)

ONE "ORDER FOR SERVICE" FOR EACH ADDRESS

TO: SHERIFF OF COLUMBIA COUNTY

DATE _____

PROTHONOTARY NO. 98-CV-1323

ATTY. I.D. AND TELEPHONE NO. FIRST

JAMES W. ADELMAN, ESQ. I.D.#02604
MORRIS & ADELMAN, P.C.
1920 Chestnut Street, Suite 400
P.O. Box 30477
Philadelphia, PA 19103-8477
(215) 568-5621

SHERIFF COST TOTAL _____

WRIT OF EXEC. (LEVY & ATTACHMENT)

COMPLAINT IN _____

SUMMONS IN _____

OTHER _____

HAJOCA CORPORATION

vs. PLAINTIFF

PERSON SERVED _____

RELATION/POSITION _____

PLACE OF SERVICE _____

JOHN M. DOWNS Ind. & t/a JOHN M. DOWNS

PLUMBING & HEATING DEFENDANT

TIME OF SERVICE _____

DATE OF SERVICE _____

SERVE AT: DEFENDANT

(Do Not Use P.O. Box Or R.D.#'s)

NUMBER OF ATTEMPTS _____

320 West Main Street
Bloomsburg, PA 17815

DEPUTY _____

DEPUTY _____

LAST DAY ^{For} ~~OF~~ SERVICE _____

SPECIAL INSTRUCTIONS:

(Use Reverse Side If Necessary)

Our file no.# 943092

SERVICE WAS NOT MADE BECAUSE:

(For Deputy Use Only)

ORDER FOR SERVICE

(ALL INFORMATION FROM ATTORNEY MUST BE FILLED IN BEFORE SERVICE CAN BE MADE)

ONE "ORDER FOR SERVICE" FOR EACH ADDRESS

TO: SHERIFF OF COLUMBIA COUNTY

DATE _____

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(215) 568-5621

SHERIFF COST TOTAL _____

WRIT OF EXEC. (LEVY & ATTACHMENT) _____

COMPLAINT IN _____

SUMMONS IN _____

OTHER _____

HAJOCA CORPORATION
VS. PLAINTIFF

PERSON SERVED _____

RELATION/POSITION _____

PLACE OF SERVICE _____

JOHN M. DOWNS Ind. & t/a JOHN M. DOWNS
PLUMBING & HEATING DEFENDANT

TIME OF SERVICE _____

DATE OF SERVICE _____

SERVE AT: DEFENDANT
(Do Not Use P.O. Box Or R.D.#'s)

NUMBER OF ATTEMPTS _____

320 West Main Street
Bloomsburg, PA 17815

DEPUTY _____

DEPUTY _____

For
LAST DAY ~~OF~~ SERVICE _____

SPECIAL INSTRUCTIONS:
(Use Reverse Side If Necessary)

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TO: SHERIFF OF COLUMBIA COUNTY

DATE _____

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(215) 568-5621

SHERIFF COST TOTAL _____

WRIT OF EXEC. (LEVY & ATTACHMENT) _____

COMPLAINT IN _____

SUMMONS IN _____

OTHER _____

HAJOCA CORPORATION

VS. PLAINTIFF

PERSON SERVED _____

RELATION/POSITION _____

PLACE OF SERVICE _____

FIRST COLUMBIA BANK & TRUST, Garnishee

DEFENDANT

TIME OF SERVICE _____

DATE OF SERVICE _____

SERVE AT: GARNISHEE
(Do Not Use P.O. Box Or R.D.#'s)

1016 W. Front Street
Berwick, PA 18603

NUMBER OF ATTEMPTS _____

DEPUTY _____

DEPUTY _____

For
LAST DAY ~~OF~~ SERVICE _____

SPECIAL INSTRUCTIONS:
(Use Reverse Side If Necessary)

Our file no.# 943092

SERVICE WAS NOT MADE BECAUSE:
(For Deputy Use Only)

ORDER FOR SERVICE

(ALL INFORMATION FROM ATTORNEY MUST BE FILLED IN BEFORE SERVICE CAN BE MADE)

ONE "ORDER FOR SERVICE" FOR EACH ADDRESS

TO: SHERIFF OF COLUMBIA COUNTY

DATE _____

PROTHONOTARY NO. 98-CV-1323

ATTY. I.D. AND TELEPHONE NO. FIRST

JAMES W. ADELMAN, ESQ. I.D.#02604
MORRIS & ADELMAN, P.C.
1920 Chestnut Street, Suite 400
P.O. Box 30477
Philadelphia, PA 19103-8477
(215) 568-5621

SHERIFF COST TOTAL _____

WRIT OF EXEC. (LEVY & ATTACHMENT) _____

COMPLAINT IN _____

SUMMONS IN _____

OTHER _____

HAJOCA CORPORATION

VS. PLAINTIFF

PERSON SERVED _____

RELATION/POSITION _____

PLACE OF SERVICE _____

FIRST COLUMBIA BANK & TRUST, Garnishee

DEFENDANT

TIME OF SERVICE _____

DATE OF SERVICE _____

SERVE AT: GARNISHEE
(Do Not Use P.O. Box Or R.D.#'s)

1016 W. Front Street
Berwick, PA 18603

NUMBER OF ATTEMPTS _____

DEPUTY _____

DEPUTY _____

LAST DAY ^{FOR} ~~OF~~ SERVICE _____

SPECIAL INSTRUCTIONS:
(Use Reverse Side If Necessary)

Our file no.# 943092

SERVICE WAS NOT MADE BECAUSE:
(For Deputy Use Only)

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

HAJOCA CORPORATION
950 Township Line Road
Chester, PA 19013

No. 98-CV-1323..... Term 19.....E.D.
No. Term 19.....I.D.
No. 113-ED Term 19 98

vs
JOHN M. DOWNS ind. & t/a JOHN M.
DOWNS PLUMBING & HEATING.....
320 W. Main Street
Bloomsburg, PA 17815 and.....
FIRST COLUMBIA BANK & TRUST, Garn.

WRIT OF EXECUTION
(MONEY JUDGEMENTS)

COMMONWEALTH OF PENNSYLVANIA, COUNTY OF COLUMBIA.....

TO THE SHERIFF OF COLUMBIA..... COUNTY, PENNA.

To satisfy the judgement, interest and costs against JOHN M. DOWNS Ind. & t/a JOHN M. DOWNS

PLUMBING & HEATING, 320 W. Main St., Bloomsburg, PA 17815
..... 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 BANK & TRUST, 1016 W. Front Street, Berwick, PA 18603

..... as Garnishee (s)
(Specifically describe property)

ALL ACCOUNTS, FUNDS, DEPOSITS, DEBTS, OR OTHER ITEMS OF PERSONAL PROPERTY STANDING IN THE NAME OF THE DEFENDANT.

Complaint \$55.50 pd
Judgment \$ 9.00 pd
Cost \$ 15.00 pd
Satisfy \$ 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 \$4,342.54.....

Interest from 11/9/98.....

Total

Plus costs as per endorsement hereon.

Tami B. Kline
.....
Prothonotary, Court of Common Pleas of
Columbia County, Penna.

By: *Elizabeth A. Brennan*
Deputy

Dated *12/29/98*
(SEAL)

IN THE COURT OF COMMON PLEAS OF COLUMBIA COUNTY, PENNSYLVANIA
CIVIL DIVISION

HAJOCA CORPORATION :
950 Township Line Road :
Chester, PA 19013 :

Plaintiff :

EX. NO. 98-CV-1323

v. :

JOHN M. DOWNS ind. & t/a JOHN M. :
DOWNS PLUMBING & HEATING :
320 West Main Street :
Bloomsburg, PA 17815 and Defendant :
FIRST COLUMBIA BANK & TRUST, Garn. :

JUDGMENT NO.

113-ED-1998

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 \$300.00. 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 for exemption form and demand for a prompt hearing. (2) Deliver the form or mail it to the Sheriff's Office at the address noted.

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

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

LAWYER REFERRAL SERVICE
Joseph A. Blass, Court Administrator
Columbia County Court House
Bloomsburg, PA 17815
(717) 389-5667

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

IN THE COURT OF COMMON PLEAS OF COLUMBIA COUNTY, PENNSYLVANIA
CIVIL DIVISION

HAJOCA CORPORATION
950 Township Line Road
Chester, PA 19013

Plaintiff :

EX. NO.98-CV-1323

v.

JOHN M. DOWNS ind. & t/a JOHN M.
DOWNS PLUMBING & HEATING
320 West Main Street
Bloomsburg, PA 17815 and Defendant :
FIRST COLUMBIA BANK & TRUST, Garn.

SUR. JUDGMENT NO.

113-ED-1998

CLAIM FOR EXEMPTIONS

To the Sheriff:

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

(1) From my personal property in my possession 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 _____

(Address)

(Telephone Number)

I verify that the statements made in this Claim for Exemptions 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 of authorities.

Date: _____

(Defendant)

THIS CLAIM TO BE FILED WITH THE OFFICE
OF THE SHERIFF OF COLUMBIA COUNTY

Columbia County Courthouse
P.O. Box 380
Bloomsburg, PA 17815
(717) 389-5622

MORRIS & ADELMAN, P.C.
P.O. BOX 30477
PHILADELPHIA, PA 19103-8177

Two Hundred and xx/100 Dollars

No. 092622 OUR FILE NO. 943092

PNCBANK, NA
Pittsburgh, PA

3-5
3-10

DATE	CHECK NO.	AMOUNT
98/12/22	92622	\$200.00

PAY TO
THE
ORDER OF

Sheriff of Columbia County
Courthouse P.O. Box 380
Bloomsburg, PA 17815

TRUST ACCOUNT II
VOID AFTER 60 DAYS

[Handwritten Signature]

⑆092622⑆ ⑆031000053⑆ 8545049257⑆

VICE PRESIDENT