

12-07674-0/BL

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PA

Township of Crescent  
Plaintiff

Civil Division  
No.

vs.

Charles D. Long  
Defendant(s)

Entry of Appearance

Filed on Behalf of Plaintiff,  
Township of Crescent

Property Address:  
687 Ridge Avenue  
Crescent, Pennsylvania 15046

Counsel of Record for this Party:  
Megan O. Iannacone, Esquire  
Attorney ID 307230

Lot & Block No.: 702-F-208

Portnoff Law Associates, Ltd.  
P.O. Box 391  
Norristown, PA 19404  
Phone: (866) 211-9466  
Fax: (484) 690-9301

12-07674-0/BL/JAK  
PORTNOFF LAW ASSOCIATES, LTD.  
BY: MEGAN O. IANNACONE, ESQUIRE  
P.O. BOX 391  
NORRISTOWN, PA 19404  
(866) 211-9466

ATTORNEY FOR PLAINTIFF  
ATTORNEY ID 307230

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Township of Crescent	:	IN THE COURT OF COMMON PLEAS
Plaintiff		
	vs.	
Charles D. Long	:	ALLEGHENY COUNTY, PA
Defendant(s)	:	NO.
	:	IN REM

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#### ENTRY OF APPEARANCE

Kindly enter my appearance on behalf of Plaintiff, Township of Crescent, in the above-captioned matter.

Respectfully submitted,

PORTNOFF LAW ASSOCIATES, LTD.

Date: \_\_\_\_\_ BY: \_\_\_\_\_  
MEGAN O. IANNACONE, ESQUIRE  
Attorney for Plaintiff

12-07674-0/BL

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PA

Township of Crescent  
Plaintiff

Civil Division  
No.

vs.

Charles D. Long  
Defendant(s)

Municipal Claim

Filed on Behalf of Plaintiff,  
Township of Crescent

Property Address:  
687 Ridge Avenue  
Crescent, Pennsylvania 15046

Counsel of Record for this Party:  
Megan O. Iannacone, Esquire  
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Township of Crescent	:	IN THE COURT OF COMMON PLEAS
Plaintiff		
	vs.	
Charles D. Long	:	ALLEGHENY COUNTY, PA
Defendant(s)	:	NO.
	:	IN REM

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### **MUNICIPAL CLAIM**

Township of Crescent hereby files a lien for non-payment of trash fees for the year(s) 2011 duly assessed against the following owners and described properties in accordance with Ordinance of Township of Crescent, authorizing the fee schedule which is attached hereto, to be imposed upon the debtor.

<u>OWNER NAME AND LAST KNOWN MAILING ADDRESS</u>	<u>PROPERTY</u>	<u>AMOUNT</u>
Charles D. Long 687 Ridge Avenue Crescent, PA 15046	687 Ridge Avenue Crescent, Pennsylvania 15046 Lot & Block No.: 702-F-208	\$223.25

Respectfully submitted,

PORTNOFF LAW ASSOCIATES, LTD.

Date: \_\_\_\_\_ BY: \_\_\_\_\_  
MEGAN O. IANNAcone, ESQUIRE  
Attorney for Plaintiff

## **Fee Schedule**

<b>ACTION</b>	<b>COLLECTION FEES</b>
Prepare and provide notice pursuant to 53 PS § 7106	Not to exceed \$50.00
Handling fee for returned check	\$25.00
Handling fee to issue refund check	\$15.00
Bookkeeping fee for payment plan of 3 months or less	\$25.00
Bookkeeping fee for payment plan of more than 3 months	\$50.00
Guaranteed Payoff Fee	\$25.00
<b>ACTION</b>	<b>ATTORNEY FEES</b>
Initial review and send first demand letter	\$160.00
File Lien and prepare Satisfaction	\$250.00
Prepare Writ of Scire Facias	\$250.00
Obtain Re-Issued Writ	\$30.00
Prepare and mail letter under Pa. R.C.P. §237.1	\$30.00
Prepare Motion for Alternate Service	\$175.00
Prepare Default Judgment	\$175.00
Prepare Writ of Execution	\$800.00
Attendance at Sale; Review Schedule of Distribution and resolve distribution issues	\$400.00
Continue Sheriff Sale	\$50.00
Petition to Assess Damages	\$50.00
Petition for Free & Clear Sale	\$400.00
Prepare Bankruptcy Proof of Claim	\$100.00
Services not covered above	At an hourly rate between \$60.00-\$225.00 per hour

There shall be added to the above amounts reasonable out-of-pocket charges, costs, expenses and fees such as, but not limited to, postage, title searches, Department of Court Records' fees and Sheriff's fees.

The collection fees and attorney fees listed above will be assessed only if the corresponding action is performed. If legal proceedings had begun prior to the mailing of this letter, one or more of the actions listed above may have been performed and the corresponding fee(s) may have been assessed prior to the date of this letter.

*Township of Crescent*

