

12-27954-0/BL

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PA

Borough of Wilkinsburg  
Plaintiff

Civil Division  
No.

vs.

Tawnya L. Heyward  
Lillie L. Kinsey  
Defendant(s)

Entry of Appearance

Filed on Behalf of Plaintiff,  
Borough of Wilkinsburg

Property Address:  
2062 East Kendon Drive  
Wilkinsburg, Pennsylvania

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

Lot & Block No.: 296-K-040

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

12-27954-0/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

Borough of Wilkinsburg  
Plaintiff

vs.

Tawnya L. Heyward  
Lillie L. Kinsey  
Defendant(s)

: IN THE COURT OF COMMON PLEAS  
:  
: ALLEGHENY COUNTY, PA  
:  
: NO.  
:  
: IN REM

### ENTRY OF APPEARANCE

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

Respectfully submitted,

PORTNOFF LAW ASSOCIATES, LTD.

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

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Borough of Wilkinsburg  
Plaintiff

Civil Division  
No.

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Tawnya L. Heyward  
Lillie L. Kinsey  
Defendant(s)

Tax Claim/Municipal Claim

Filed on Behalf of Plaintiff,  
Borough of Wilkinsburg

Property Address:  
2062 East Kendon Drive  
Wilkinsburg, Pennsylvania

Counsel of Record for this Party:  
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Borough of Wilkinsburg : IN THE COURT OF COMMON PLEAS  
Plaintiff  
vs. : ALLEGHENY COUNTY, PA  
Tawnya L. Heyward :  
Lillie L. Kinsey : NO.  
Defendant(s) :  
IN REM

**TAX CLAIM/MUNICIPAL CLAIM**

Borough of Wilkinsburg hereby files a lien for non-payment of municipal service fees for the year(s) 2011 duly assessed against the following owners and described properties in accordance with Ordinance of Borough of Wilkinsburg, 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>
Tawnya L. Heyward Lillie L. Kinsey 2062 Kendon Drive E. Pittsburgh, PA 15221	2062 East Kendon Drive Wilkinsburg, Pennsylvania Lot & Block No.: 296-K-040	\$218.00

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 Mail Legal Notice pursuant to 53 PS §7106	Not to exceed \$50.00*
<b>ACTION</b>	<b>ATTORNEY FEES</b>
Initial review and sending first demand letter	\$150.00
File Lien and mail second demand letter	\$150.00
Prepare Writ of Scire Facias	\$150.00
Obtain Re-Issued Writ	\$25.00
Prepare and mail letter under Pa. R.C.P. §237.1	\$25.00
Prepare Motion for Alternate Service	\$175.00
Prepare Default Judgment	\$150.00
Prepare Writ of Execution	\$750.00
Attendance at Sale; Review Schedule of Distribution and Resolve Distribution Issues	\$400.00
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 Record's fees, and Sheriff's fees.

The collection and attorney fees listed on the fee schedule will be assessed only if the corresponding action needs to be 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.

\*Presently the charge for this notice is \$35.00.

*Borough of Wilkinsburg*