

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

KING'S GRANT CONDOMINIUM
ASSOCIATION,

Plaintiff,

vs.

EILEEN A. FLOSNIK,

Defendant.

CIVIL DIVISION

No. AR 12-

PLEADING FILED:

COMPLAINT IN CIVIL ACTION

FILED ON BEHALF OF PLAINTIFF

COUNSEL OF RECORD FOR THIS
PARTY:

LISA M. BURKHART, ESQUIRE
PA ID #200272

Brandt, Milnes & Rea, P.C.
Firm No. 032

1109 Grant Building
310 Grant Street
Pittsburgh, PA 15219

(412) 255-6500

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

KING'S GRANT CONDOMINIUM
ASSOCIATION,

No. _____

Plaintiff,

Arbitration Docket 2012

vs.

Hearing Date _____, 2012

EILEEN A. FLOSNIK,

Defendant.

COMPLAINT IN CIVIL ACTION

1. The Plaintiff's address is c/o Property Manager, Stevenson Williams Company, at 666 Washington Road, Pittsburgh, Allegheny County, Pennsylvania 15228.

2. The Defendant, Eileen A. Flosnik, has an address of 1030-E Eve Drive, Pittsburgh, Allegheny County, Pennsylvania 15216.

(STATE BRIEFLY, CONCISELY, NATURE AND AMOUNT OF THE CLAIM)

3. On or about August 16, 2012, the Defendant's account as a Unit Owner at the King's Grant Condominium Association was delinquent in the amount of \$2,025.25. As the Unit Owner, Defendant is responsible for this account, and there is no defense to this claim. Pursuant to the Uniform Condominium Act of Pennsylvania, Plaintiff also seeks accelerated dues for the remainder of 2012. These dues are for a period of four (4) months at \$305.00 per month, for a total of \$1,220.00. Plaintiff seeks damages as per the Condominium documents, as recorded, and the Uniform Condominium Act of Pennsylvania, as amended, in the amount of \$3,245.25, plus attorney fees, interest and costs and those fees and assessments that come due during the course of this litigation, plus any fines which may be applied to this account.

WHEREFORE, Plaintiff, King's Grant Condominium Association, seeks damages in the amount of \$3,245.25, plus attorney fees, interest and costs and those fees and assessments that come due during the course of this litigation.

Notice: You are hereby notified to return "Notice of Intention to Appear" within twenty days (20) from service hereof or a default judgment or an award may be entered against you.

/s/Lisa M. Burkhart

Lisa M. Burkhart

Attorney for the Plaintiff

1109 Grant Building, 310 Grant Street

Pittsburgh, PA 15219

(412) 255-6500

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

KING'S GRANT CONDOMINIUM
ASSOCIATION,

No. _____

Plaintiff,

Arbitration Docket 2012

vs.

Hearing Date _____, 2012

EILEEN A. FLOSNIK,

Defendant.

NOTICE TO DEFEND

YOU HAVE BEEN SUED IN COURT. If you wish to defend against the claims set forth in the attached copy of the suit papers, YOU MUST complete and detach two of the copies of the "Notice of Intention To Appear". One completed copy of the "Notice of Intention to Appear" must be filed or mailed to the Prothonotary's Office, First Floor, City-County Building, 414 Grant Street, Pittsburgh, PA 15219 and the other must be mailed to: **Lisa M. Burkhardt, Esquire, 1109 Grant Building, 310 Grant Street, Pittsburgh, PA 15219** within TWENTY (20) days from the date these papers were mailed. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you. YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

LAWYER REFERRAL SERVICE

The Allegheny County Bar Association
920 City-County Building
Pittsburgh, PA 15219
(412) 261-5555

NOTICE OF HEARING DATE

YOU HAVE BEEN SUED IN COURT. The above Notice to Defend explains what you must do to dispute the claims made against you. If you file the written response referred to in the Notice to Defend, a hearing before a board of arbitrators will take place in Room 523 of the Allegheny County Courthouse, 436 Grant Street, Pittsburgh, Pennsylvania, on the ____ day of _____, 2012 at 9:00 a.m. IF YOU FAIL TO FILE THE RESPONSE DESCRIBED IN THE NOTICE TO DEFEND, A JUDGMENT FOR THE AMOUNT CLAIMED IN THE COMPLAINT MAY BE ENTERED AGAINST YOU BEFORE THE HEARING.

DUTY TO APPEAR AT ARBITRATION HEARING

If one or more parties is not present at the hearing, THE MATTER MAY BE HEARD AT THE SAME TIME AND DATE BEFORE A JUDGE OF THE COURT WITHOUT THE ABSENT PARTY OR PARTIES. THERE IS NO RIGHT TO A TRIAL DE NOVO ON APPEAL FROM A DECISION ENTERED BY A JUDGE.

NOTICE:

YOU MUST RESPOND TO THIS COMPLAINT WITHIN TWENTY (20) DAYS OR A JUDGMENT FOR THE AMOUNT CLAIMED MAY BE ENTERED AGAINST YOU BEFORE THE HEARING. IF ONE OR MORE PARTIES IS NOT PRESENT AT THE HEARING, THE MATTER MAY BE HEARD IMMEDIATELY BEFORE A JUDGE WITHOUT THE ABSENT PARTY OR PARTIES. THERE IS NO RIGHT TO A TRIAL DE NOVO ON APPEAL FROM A DECISION ENTERED BY A JUDGE.