

12-36807-0/BL

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PA

Borough of North Braddock
Plaintiff

Civil Division
No.

vs.

Bernard Furby, Sr.
Defendant(s)

Entry of Appearance

Filed on Behalf of Plaintiff,
Borough of North Braddock

Property Address:
1224 Rebecca Avenue
North Braddock, Pennsylvania 15104

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

Lot & Block No.: 302-K-006

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

12-36807-0/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 North Braddock	:	IN THE COURT OF COMMON PLEAS
Plaintiff		
	vs.	
Bernard Furby, Sr.	:	ALLEGHENY COUNTY, PA
Defendant(s)	:	NO.
	:	IN REM

ENTRY OF APPEARANCE

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

Respectfully submitted,

PORTNOFF LAW ASSOCIATES, LTD.

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

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IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PA

Borough of North Braddock
Plaintiff

Civil Division
No.

vs.

Bernard Furby, Sr.
Defendant(s)

Municipal Claim

Filed on Behalf of Plaintiff,
Borough of North Braddock

Property Address:
1224 Rebecca Avenue
North Braddock, Pennsylvania 15104

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

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Borough of North Braddock	:	IN THE COURT OF COMMON PLEAS
Plaintiff		
	vs.	
Bernard Furby, Sr.	:	ALLEGHENY COUNTY, PA
Defendant(s)	:	NO.
	:	
	:	IN REM

MUNICIPAL CLAIM

Borough of North Braddock 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 Borough of North Braddock, authorizing the fee schedule which is attached hereto, to
be imposed upon the debtor.

OWNER NAME AND
LAST KNOWN MAILING
ADDRESS
Bernard Furby, Sr.
2112 Crestas Avenue
N. Versailles, PA 15137

<u>PROPERTY</u>	<u>AMOUNT</u>
1224 Rebecca Avenue	\$489.50
North Braddock, Pennsylvania 15104	
Lot & Block No.: 302-K-006	

Respectfully submitted,

PORTNOFF LAW ASSOCIATES, LTD.

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

Fee Schedule

ACTION	COLLECTION FEES
Prepare and Provide Notice Pursuant to 53 PS § 7106	\$40.00 plus certified mail postage charges
Handling fee for returned check	\$30.00
Handling fee to issue refund check	\$20.00
Bookkeeping fee for payment plan of three months or less	\$25.00
Bookkeeping fee for payment plan of more than three months	\$50.00
Guaranteed Payoff Fee	\$25.00
ACTION	ATTORNEY FEES
Initial review and issue first demand letter	\$160.00
File Lien and issue second demand letter	\$175.00
Prepare Writ of Scire Facias	\$175.00
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's Sale	\$50.00
Petition to Assess Damages	\$50.00
Petition for Free and 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.

Borough of North Braddock