

# PIOSA HIXSON & REILLY

ATTORNEYS AT LAW

MICHAEL J. PIOSA  
BOYD G. HIXSON  
THOMAS E. REILLY, JR.  
THOMAS A. CAPEHART

ONE WINDSOR PLAZA, SUITE 101  
7535 WINDSOR DRIVE  
ALLENTOWN, PENNSYLVANIA 18195-1014

TEL: (610) 530-7500  
FAX: (610) 530-8190

August 15, 2001

*Via Facsimile: 570-784-0257*  
Office of the Sheriff  
Columbia County Courthouse  
PO Box 380  
Bloomsburg, PA 17815

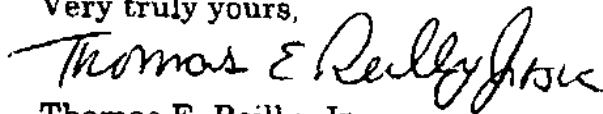
Re: Charles Burkland & Diane Probst  
Replevin Action - Writ of Possession Docket #82ED2001

Dear Sir/Madam:

Please accept this letter as a formal request to CANCEL the eviction which is currently scheduled for August 20, 2001. This action is due to the Defendants voluntarily vacating the mobile home. They have informed the Bank that the home is vacant and turned over the keys to the home directly to the Bank.

As such, please cancel the eviction and return any refund which may be due to the Bank.

If you have any questions, please feel free to call.

Very truly yours,  
  
Thomas E. Reilly, Jr.

jlk  
cc: Richard Kistner - NPB (via facsimile)

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) 784-4300

NATIONAL PENN BANK

Docket # 82ED2001

VS

WRIT OF POSSESSION

CHARLES A. BURKLAND, JR. AND DIANE  
M. PROBST

AFFIDAVIT OF SERVICE

NOW, THIS THURSDAY, AUGUST 09, 2001, AT 9:10 AM, SERVED THE WITHIN WRIT OF POSSESSION UPON CHARLES A. BURKLAND AT RD#2 BOX 96N1, LOT D4, ORANGEVILLE BY POSTING TO FRONT DOOR A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT AND MADE KNOWN TO THEM THE CONTENTS THEREOF.

SO ANSWERS,

SWORN AND SUBSCRIBED BEFORE ME  
THIS FRIDAY, AUGUST 10, 2001

Sarah J. Hower  
NOTARY PUBLIC  
SARAH J. HOWER

NOTARIAL SEAL  
SARAH J. HOWER, Notary Public  
Bloomsburg, Columbia County, PA  
My Commission Expires June 21, 2003

X \_\_\_\_\_  
SHERIFF HARRY A. ROADARMEL JR.

X R. King  
R. KING  
DEPUTY SHERIFF

Bealms Term C  
MOCED / ~~JUST MOCED~~  
VACANT

# COLUMBIA COUNTY SHE PROCESS SERVICE

OFFICER: T. CHAMBERLAIN SERVICE DOCKET

PLAINTIFF NATIONAL PENN BANK

DEFENDANT CHARLES A. BURKLANI

<b>PERSON/CORP TO SERVED</b>
DIANE M. PROBST
RD#2 BOX 96N1, LOT D4
ORANGEVILLE

PAPERS  
~~EXECUT~~

SERVED UPON POSTED VACANT

RELATIONSHIP \_\_\_\_\_ IDENTIFICATION \_\_\_\_\_

DATE 8/9/01 TIME 0910 MILEAGE \$5.- OTHER \_\_\_\_\_

Race \_\_\_ Sex \_\_\_ Height \_\_\_ Weight \_\_\_ Eyes \_\_\_ Hair \_\_\_ Age \_\_\_ Military \_\_\_

- TYPE OF SERVICE:
- A. PERSONAL SERVICE AT POA \_\_\_ POB \_\_\_ POE \_\_\_ CCSO \_\_\_
  - B. HOUSEHOLD MEMBER: 18+ YEARS OF AGE AT POA
  - C. CORPORATION MANAGING AGENT
  - D. REGISTERED AGENT
  - E. NOT FOUND AT PLACE OF ATTEMPTED SERVICE

F. OTHER (SPECIFY) \_\_\_\_\_

ATTEMPTS DATE	TIME	OFFICER	REMARKS
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

DEPUTY Ryan Kuey DATE 8/9/01

# COLUMBIA COUNTY SHERIFF'S OFFICE PROCESS SERVICE ORDER

OFFICER: T. CHAMBERLAIN

SERVICE# 1 - OF - 2 SERVICES  
DOCKET # 82ED2001

PLAINTIFF NATIONAL PENN BANK

DEFENDANT CHARLES A. BURKLAND, JR. AND DIANE M. PROBST

<b>PERSON/CORP TO SERVED</b>
CHARLES A. BURKLAND
RD#2 BOX 96N1, LOT D4
ORANGEVILLE

**PAPERS TO SERVED**

~~EXECUTION~~

*Writ of Possession*

SERVED UPON *POSTED* *VACANT*

RELATIONSHIP \_\_\_\_\_ IDENTIFICATION \_\_\_\_\_

DATE *8/9/01* TIME *5:10* MILEAGE *45* OTHER \_\_\_\_\_

Race \_\_\_ Sex \_\_\_ Height \_\_\_ Weight \_\_\_ Eys \_\_\_ Hair \_\_\_ Age \_\_\_ Military \_\_\_

- TYPE OF SERVICE: A. PERSONAL SERVICE AT POA \_\_\_ POB \_\_\_ POE \_\_\_ CCSO \_\_\_  
 B. HOUSEHOLD MEMBER: 18+ YEARS OF AGE AT POA  
 C. CORPORATION MANAGING AGENT  
 D. REGISTERED AGENT  
 E. NOT FOUND AT PLACE OF ATTEMPTED SERVICE

F. OTHER (SPECIFY) \_\_\_\_\_

ATTEMPTS DATE	TIME	OFFICER	REMARKS
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

DEPUTY *Ryan King* DATE *8/9/01*

# PIOSA HIXSON & REILLY

ATTORNEYS AT LAW

MICHAEL J. PIOSA  
BOYD G. HIXSON  
THOMAS E. REILLY, JR.  
THOMAS A. CAPEHART

ONE WINDSOR PLAZA, SUITE 101  
7535 WINDSOR DRIVE  
ALLENTOWN, PENNSYLVANIA 18195-1014

TEL: (610) 530-7500

FAX: (610) 530-8190

July 25, 2001

Office of the Sheriff  
Columbia County Courthouse  
PO Box 380  
Bloomsburg, PA 17815

Re: Charles Burkland & Diane Probst  
Replevin Action - Writ of Possession

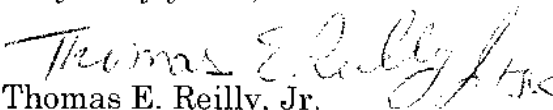
Dear Sir/Madam:

Enclosed herewith is an original and two copies of Writ of Possession and a copy of the Praecipe for Writ of Possession, in the above-referenced replevin action, along with a check in the amount of \$100.00.

Kindly serve the Writ of Possession on the Defendants and advise them they have 10 days to vacate the premises. If the premises is not vacated within 10 days of the date of service, the Bank will have them evicted and take possession of the mobile home.

Kindly notify my office as soon as service has been completed. If you have any questions, please feel free to call.

Very truly yours,

  
Thomas E. Reilly, Jr.

jlk  
Enclosures

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

NATIONAL PENN BANK,  
Plaintiff

vs.

CHARLES A. BURKLAND, JR. and DIANE M.  
PROBST,  
Defendants

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)

No. 2000-CV-1260

REPLEVIN ACTION

2001 ED 82

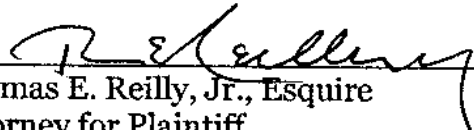
**PRAECIPE FOR WRIT OF POSSESSION**

TO THE PROTHONOTARY:

Kindly issue the Writ of Possession in the above matter.

RECEIVED  
JUL 30 2001  
PROTHONOTARY/  
CLERK OF COURTS

PIOSA, HIXSON & REILLY P.C.

  
Thomas E. Reilly, Jr., Esquire  
Attorney for Plaintiff  
Attorney I. D. #41668

One Windsor Plaza, Suite 101  
7535 Windsor Drive  
Allentown, PA 18195-1014  
(610) 530-7500

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

NATIONAL PENN BANK,  
Plaintiff

vs.

CHARLES A. BURKLAND, JR. and DIANE M.  
PROBST,  
Defendants

No. 2000-CV-1260

REPLEVIN ACTION

2001 ED 82

**WRIT OF POSSESSION**

Commonwealth of Pennsylvania: )  
County of Columbia )

To the Sheriff of Columbia County:

To satisfy the Judgment for Possession in the above matter, you are directed to deliver possession of the following described property to National Penn Bank:

**1998 Redman Mobile Home, Serial Number 12232107 and located at RR #2 Box 96N1, Lot D4, Orangeville, PA 17846.**

Terrie B. Klew  
Prothonotary/Clerk, Civil Div.

by: Elizabeth A. Swann  
Deputy

Seal of the Court

Date 7/30/01

Complaint \$ 85.50 paid  
Judgment \$ 14.00 paid  
Writ \$ 23.00 paid  
Satisfy \$ 7.00

By: Thomas E. Reilly, Jr.  
Attorney for Plaintiff  
One Windsor Plaza, Suite 101  
7535 Windsor Drive  
Allentown, PA 18195-1014

ORIGINAL DOCUMENT IS PRINTED ON CHEMICAL REACTIVE PAPER & HAS A MICROPRINTED BORDER

12970

PIOSA HIXSON & REILLY PC  
ONE WINDSOR PLAZA, SUITE B101  
7535 WINDSOR DRIVE  
ALLENTOWN, PA 18195-1014



FIRST UNION NATIONAL BANK  
ALLENTOWN, PA

NUMBER

3-50/310

00012970

PAY:

ONE HUNDRED AND XX / 100 Dollars

DATE

AMOUNT

07/25/01

\*\*\*\*\*\$100.00

TO THE COLUMBIA COUNTY SHERIFF  
ORDER  
OF

GENERAL ACCOUNT VOID AFTER 90 DAYS

NDR/BURPK THE REVERSE SIDE OF THE DOCUMENT INCLUDES AN ARTIFICIAL WATERMARK - HOLD AT AN ANGLE TO VIEW

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