

11-45493-0/12-30199-0/13-26323-0/4NF/JAK

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PA

Borough of Wilkinsburg
Plaintiff

Civil Division
No.

vs.

Richard Delavega
Loretta Delavega
Defendant(s)

Entry of Appearance

Filed on Behalf of Plaintiff,
Borough of Wilkinsburg

Property Address:
815 Glenn Avenue
Wilkinsburg, Pennsylvania

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

Lot & Block No.: 232-J-328

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

11-45493-0/12-30199-0/13-26323-0/4NF/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	:	IN THE COURT OF COMMON PLEAS
	vs.	
Richard Delavega Loretta Delavega Defendant(s)	:	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

11-45493-0/12-30199-0/13-26323-0/4NF/JAK

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PA

Borough of Wilkinsburg
Plaintiff

Civil Division
No.

vs.

Richard Delavega
Loretta Delavega
Defendant(s)

Tax Claim/Municipal Claim

Filed on Behalf of Plaintiff,
Borough of Wilkinsburg

Property Address:
815 Glenn Avenue
Wilkinsburg, Pennsylvania

Counsel of Record for this Party:
Megan O. Iannacone, Esquire
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Borough of Wilkinsburg : IN THE COURT OF COMMON PLEAS
Plaintiff
vs. : ALLEGHENY COUNTY, PA
Richard Delavega :
Loretta Delavega : NO.
Defendant(s) :
: IN REM

TAX CLAIM/MUNICIPAL CLAIM

Borough of Wilkinsburg hereby files a lien for non-payment of municipal service fees and real estate taxes for the years 2010-2012 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>
Richard Delavega Loretta Delavega 206 Rustic Lodge Road Apartment 13 Indiana, PA 15701	815 Glenn Avenue Wilkinsburg, Pennsylvania Lot & Block No.: 232-J-328	\$1,440.35

Respectfully submitted,
PORTNOFF LAW ASSOCIATES, LTD.

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

Fee Schedule

ACTION	COLLECTION FEES
Prepare and Mail Legal Notice pursuant to 53 PS §7106	Not to exceed \$50.00*
ACTION	ATTORNEY FEES
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 Wilkesburg