

23-48537-0/BU4/DFM
PORTNOFF LAW ASSOCIATES, LTD.
BY: RUSSELL E. BRYANT, ESQUIRE
P.O. BOX 391
NORRISTOWN, PA 19404
(866) 211-9466

ATTORNEY FOR PLAINTIFF
ATTORNEY ID 328139

Lower Makefield Township : IN THE COURT OF COMMON PLEAS
1100 Edgewood Road :
Yardley, PA 19067 : BUCKS COUNTY, PA
Plaintiff :
vs. : NO.
Gary W. Wolf, II :
Marielle P. Wolf : IN REM
Defendants :

MUNICIPAL CLAIM

Lower Makefield Township hereby files a lien for non-payment of sewer fees for the period 1st quarter of 2022, duly assessed against the following owners and described property in accordance with an Ordinance of Lower Makefield Township, pursuant to the fee schedule which is attached hereto.

I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

OWNER NAMES AND

LAST KNOWN MAILING ADDRESS

PROPERTY

AMOUNT

Gary W. Wolf, II
Marielle P. Wolf
2022 Leedom Drive
Newtown, PA 18940

2022 Leedom Drive
L Makefield Township, Pennsylvania
Tax Parcel No. 20-072-083

\$706.89

Respectfully submitted,

PORTNOFF LAW ASSOCIATES, LTD.

Date: October 11, 2023

BY: /s/ Russell E. Bryant
RUSSELL E. BRYANT, ESQUIRE
Attorney for Plaintiff

Fee Schedule

ACTION	COLLECTION FEES
Validation notice	\$25.00 per notice
Notice of delinquent claim and fee shifting	\$40.00 per notice, plus applicable postage
Bookkeeping fee for Payment Plan of 3 months or less	\$25.00
Bookkeeping fee for Payment Plan more than 3 months	\$50.00
Handling Fee for Returned Check	\$25.00

ACTION	ATTORNEY FEES
Initial review and sending first legal demand letter	\$175.00
File Lien and prepare Satisfaction	\$250.00
Prepare Writ of Scire Facias	\$250.00
Prepare and mail letter under Pa. R.C.P. §237.1	\$50.00
Prepare Default Judgment	\$175.00
Research, prepare and obtain re-issued Writ	\$175.00
Prepare Praecipe to Amend	\$100.00
Prepare Motion to Amend	\$150.00
Present Motion to Amend	\$50.00
Obtain vehicle identification number (VIN) for mobile home	\$100.00
Prepare Motion for Alternate Service	\$250.00
Present Motion for Alternate Service	\$50.00
Prepare Motion to Consolidate Claims	\$250.00
Present Motion to Consolidate Claims	\$50.00
Prepare Motion to Add United States as defendant	\$250.00
Present Motion to Add United States as defendant	\$250.00
Prepare Writ of Execution	\$800.00
Preparation for sheriff's sale; Review Schedule of Distribution and Resolve Distribution Issues	\$400.00
Prepare Motion to Continue Sheriff's sale	\$50.00
Present Motion to Continue Sheriff's sale	\$50.00
Prepare Petition for Free and Clear Sale	\$400.00
Present Petition for Free and Clear Sale	\$50.00
Services not covered above	At an hourly rate between \$75.00-\$275.00 per hour

There may also be added to a delinquent account the costs, expenses and fees incurred in collection such as, but not limited to, postage, title searches, court fees and sheriff fees. Additionally, should a lien be filed, interest in accordance with 53 P.S. § 7143 of the Municipal Claims and Tax Liens Act will begin to accrue on the date of the filing of the lien and will continue to accrue on a daily basis, increasing the amount of the balance due.

The collection fees and the 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.

Lower Makefield Township