# IN THE COURT OF COMMON PLEAS OF MONTGOMERY COUNTY, PENNSYLVANIA

VALLEY FORGE CONVENTION CENTER
PARTNERS LP T/A VALLEY FORGE CASINO
RESORT

VS.

NO. 2023-01606

#### **EVERETT STERN**

To the Prothonotary:

Enter judgment in favor of VALLEY FORGE CONVENTION CENTER PARTNERS LP T/A VALLEY FORGE CASINO RESORT and against EVERETT STERN for want of an answer.

Amount claimed in complaint \$\frac{18000.00}{}
Interest \$ 1925.68
Misc \$ 6906.70
Total \$26,832.38
Possession

I certify that written notice of the intention to file this praecipe was mailed or delivered to the party against whom judgment is to be entered and to his/her attorney of record, if any, after the default occurred and at least ten (10) days prior to the date of the filing of this praecipe. A copy of the notice is attached. R.C.P. 237.1

ORIGINAL SIG	NATURE RETAINED BY THE FILING PARTY
Signature	
JOSIAH KNA	APP, ESQ.
Filing Party	
61249	
ID Number	
JOSIAH KNA	APP LAW PC
Firm Name	
100 SOUTH E	BROAD STREET, SUITE 930
Address	
	HA DA 10110
PHILADELPH	HA, PA 19110
(215) 419-588	0
Phone	

Judgment is entered in favor of VALLEY FORGE CONVENTION CENTER PARTNERS LP T/A VALLEY FORGE CASINO RESORT and against EVERETT STERN by default for want of an answer.

Prothonotary, Montgomery County

## IN THE COURT OF COMMON PLEAS OF MONTGOMERY COUNTY, PENNSYLVANIA

VALLEY FORGE CONVENTION CENTER PARTNERS LP T/A VALLEY FORGE CASINO RESORT

VS.

NO. 2023-01606

#### **EVERETT STERN**

NOTICE IS GIVEN THAT THE ATTACHED DOCUMENT IN THE ABOVE CAPTIONED MATTER HAS BEEN ENTERED.

PROTHONOTARY

IF YOU HAVE ANY QUESTIONS CONCERNING THE ABOVE, PLEASE CONTACT:

Phone

ignature	
JOSIAH KN	ADD ESO
	AT, ESQ.
iling Party	
61249	
D Number JOSIAH KN	APP LAW PC
	APP LAW PC
JOSIAH KN	
JOSIAH KN	APP LAW PC BROAD STREET, SUITE 930
JOSIAH KN	
JOSIAH KN	

Josiah Knapp Law, PC By: Josiah Knapp, Esquire Attorney ID: 61249

100 South Broad Street, Suite 930

Philadelphia, PA 19110

### ATTORNEY FOR PLAINTIFF

Valley Forge Convention Center Partners, LP,	COURT OF COMMON PLEAS
t/a Valley Forge Casino Resort	MONTGOMERY COUNTY
Plaintiff	
V.	NO. 2023-01606
Everett Stern	
Defendant	

To: Everett Stern

243 Falcon Ridge Road

St. Augustine, FL 32084-9258

# **236 NOTICE**

NOTICE IS GIVEN THAT A JUDGMENT IN THE ABOVE CAPTIONED MATTER HAS BEEN ENTERED AGAINST YOU.

**PROTHONOTARY** 

IF YOU HAVE ANY QUESTIONS CONCERNING THE ABOVE, PLEASE CONTACT:

> osiah Knapp, Esq. ttorney ID: 61249

100 South Broad Street, Suite 1416

Philadelphia, PA 19110

(215) 419-5880

Josiah Knapp Law, PC By: Josiah Knapp, Esquire Attorney ID: 61249 100 South Broad Street, Suite 930 Philadelphia, PA 19110

#### ATTORNEY FOR PLAINTIFF

Valley Forge Convention Center Partr	ers, LP, COURT OF COMMON PLEAS
t/a Valley Forge Casino Resort	MONTGOMERY COUNTY
Plaintiff	
	NO. 2023-01606
V.	
Everett Stern	PRAECIPE FOR JUDGMENT
Defendant	
L	

To the Prothonotary:

Enter judgment in favor of Plaintiff and against: Everett Stern for want of an answer.

Amount claimed in complain	nt	\$ 18,000.00
Interest		\$ 1,925.68
Misc. (Costs)		\$ 1,540.22
Contractual Attorney Fees		\$ 5,366.48
	Total	\$ 26,832.38

I certify that written notice of the intention to file this praecipe was mailed or delivered to the party against whom judgment is to be entered and to his/her attorney of record, if any, after the default occurred and at least ten (10) days prior to the date of the filing of this praecipe. A copy of the notice is attached. R.C.P. 237.1.

Justan Knapp, Lsq.

Judgment is entered in favor of the Plaintiff and against the above named Defendants for want of an answer.

Prothonotary, Montgomery County

Josiah Knapp Law, PC By: Josiah Knapp, Esquire Attorney ID: 61249 100 South Broad Street, Suite 930 Philadelphia, PA 19110

#### ATTORNEY FOR PLAINTIFF

Valley Forge Convention Center, LP, t/a	COURT OF COMMON PLEAS
Valley Forge Casino Resort	MONTGOMERY COUNTY
Plaintiff	
v.	NO. 2023-01606
D 4.6.	
Everett Stern	
Defendant	

## AFFIDAVIT OF NON-MILITARY SERVICE

The undersigned, being duly sworn, according to law, deposes and says he represents the Plaintiff in the above entitled case; that he is authorized to make this affidavit on behalf of the Plaintiff; and that, to the best of his knowledge, the Defendant is not in the Military Service of The United States, nor any State or Territory thereof or its allies as defined in the Soldiers' and the Sailors' Civil Relief Act of 1940 and amendments thereto. Said information was obtained and verified from the following source:

Defense Manpower Data Center (Attached).

JOSIAH KNAPP LAW, PC

Josian Knapp, Esq.

Sworn to and subscribed before me This 27 day of June, 2023

Commonwealth of Pennsylvania - Notary Seal JENNIFER L. ROONEY, Notary Public Philadelphia County My Commission Expires September 22, 2023 Commission Number 1293452 Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents THIS IS AN ARBITRATION MATTER Josiah Knapp Law, PC By: Josiah Knapp, Esquire Attorney ID: 61249 100 S. Broad Street, Suite 930 Philadelphia, PA 19110 ATTORNEY FOR PLAINTIFF Valley Forge Convention Center Partners, LP COURT OF COMMON PLEAS t/a Valley Forge Casino Resort Montgomery COUNTY Plaintiff v. Everett Stern NO. 2023-01606 Defendant NOTICE OF PRAECIPE TO ENTER JUDGMENT BY DEFAULT To: Everett Stern 243 Falcon Ridge Road St. Augustine, FL 32084-9258 Date of Notice: June 13, 2023 IMPORTANT NOTICE YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN (10) DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS. YOU SHOULD TAKE THIS NOTICE TO A LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE FOLLOWING OFFICE TO FIND OUT WHERE YOU CAN GET LEGAL HELP. IF YOU CANNOT AFFORD TO HIRE A

ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Lawyer Reference Service Montgomery Bar Association 100 West Airy Street (Rear) Norristown, PA 19404-0268 (610) 279-9660, Extension 201

LAWYER, THE OFFICE BELOW MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO

JOSIAH KNAPP LAW, PC

Date: June 13, 2023

iah Knapp, Esquire orney for the Plaintiff



# Status Report Pursuant to Servicemembers Civil Relief Act

SSN:

XXX-XX-9872

Birth Date:

Last Name:

**STERN** 

First Name:

**EVERETT** 

Middle Name:

Status As Of:

Jun-27-2023

Certificate ID:

BTGZ7QXB6DD1WJF

	On Active Duty On Active	e Duty Status Date	
Active Duty Start Date	Active Duty End Date	Status	Service Component
NA	NA	No	NA NA
	This response reflects the individuals' active duty	status based on the Active Duty Status Date	

	Left Active Duty Within 367 Days	of Active Duty Status Date	
Active Duty Start Date	Active Duty End Date	Status	Service Component
NA NA	NA NA	No	NA
This re	sponse reflects where the individual left active duty statu	s within 367 days preceding the Active Duty S	Status Date

otification End Date	Status	Service Component
NA	No	NA
	NA	

Upon searching the data banks of the Department of Defense Manpower Data Center, based on the information that you provided, the above is the status of the individual on the active duty status date as to all branches of the Uniformed Services (Army, Navy, Marine Corps, Air Force, NOAA, Public Health, and Coast Guard). This status includes information on a Servicemember or his/her unit receiving notification of future orders to report for Active Duty.

Michael V. Sorrento, Director

Department of Defense - Manpower Data Center

400 Gigling Rd. Seaside, CA 93955 The Defense Manpower Data Center (DMDC) is an organization of the Department of Defense (DoD) that maintains the Defense Enrollment and Eligibility Reporting System (DEERS) database which is the official source of data on eligibility for military medical care and other eligibility systems.

The DoD strongly supports the enforcement of the Servicemembers Civil Relief Act (50 USC App. § 3901 et seq, as amended) (SCRA) (formerly known as the Soldiers' and Sailors' Civil Relief Act of 1940). DMDC has issued hundreds of thousands of "does not possess any information indicating that the individual is currently on active duty" responses, and has experienced only a small error rate. In the event the individual referenced above, or any family member, friend, or representative asserts in any manner that the individual was on active duty for the active duty status date, or is otherwise entitled to the protections of the SCRA, you are strongly encouraged to obtain further verification of the person's status by contacting that person's Service. Service contact information can be found on the SCRA website's FAQ page (Q35) via this URL: https://scra.dmdc.osd.mil/scra/#/faqs. If you have evidence the person was on active duty for the active duty status date and you fail to obtain this additional Service verification, punitive provisions of the SCRA may be invoked against you. See 50 USC App. § 3921(c).

This response reflects the following information: (1) The individual's Active Duty status on the Active Duty Status Date (2) Whether the individual left Active Duty status within 367 days preceding the Active Duty Status Date (3) Whether the individual or his/her unit received early notification to report for active duty on the Active Duty Status Date.

#### More information on "Active Duty Status"

Active duty status as reported in this certificate is defined in accordance with 10 USC § 101(d) (1). Prior to 2010 only some of the active duty periods less than 30 consecutive days in length were available. In the case of a member of the National Guard, this includes service under a call to active service authorized by the President or the Secretary of Defense under 32 USC § 502(f) for purposes of responding to a national emergency declared by the President and supported by Federal funds. All Active Guard Reserve (AGR) members must be assigned against an authorized mobilization position in the unit they support. This includes Navy Training and Administration of the Reserves (TARs), Marine Corps Active Reserve (ARs) and Coast Guard Reserve Program Administrator (RPAs). Active Duty status also applies to a Uniformed Service member who is an active duty commissioned officer of the U.S. Public Health Service or the National Oceanic and Atmospheric Administration (NOAA Commissioned Corps).

#### Coverage Under the SCRA is Broader in Some Cases

Coverage under the SCRA is broader in some cases and includes some categories of persons on active duty for purposes of the SCRA who would not be reported as on Active Duty under this certificate. SCRA protections are for Title 10 and Title 14 active duty records for all the Uniformed Services periods. Title 32 periods of Active Duty are not covered by SCRA, as defined in accordance with 10 USC § 101(d)(1).

Many times orders are amended to extend the period of active duty, which would extend SCRA protections. Persons seeking to rely on this website certification should check to make sure the orders on which SCRA protections are based have not been amended to extend the inclusive dates of service. Furthermore, some protections of the SCRA may extend to persons who have received orders to report for active duty or to be inducted, but who have not actually begun active duty or actually reported for induction. The Last Date on Active Duty entry is important because a number of protections of the SCRA extend beyond the last dates of active duty.

Those who could rely on this certificate are urged to seek qualified legal counsel to ensure that all rights guaranteed to Service members under the SCRA are protected

WARNING: This certificate was provided based on a last name, SSN/date of birth, and active duty status date provided by the requester. Providing erroneous information will cause an erroneous certificate to be provided.