

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

Plaintiff(s)/Landlord

vs.

Defendant(s)/Tenants(s)

NOTICE OF PRESENTATION

Kindly take notice that the within **PETITION TO OPEN DEFAULT JUDGMENT FOR FAILURE TO PLEAD** shall be presented before the Civil Division Housing Court Judge via teleconference at 412-677-0647 and enter Conference ID: 363 415 845# on

_____ at _____ p.m.

CIVIL DIVISION

Case No. _____

Type of Pleading

PETITION TO OPEN DEFAULT JUDGMENT FOR FAILURE TO PLEAD

Filed on behalf of:

(Name of the filing party)

___ Counsel of Record

___ Individual, if *Pro Se*

Name, Address, Telephone Number, and Email Address:

Attorney's State ID:

Attorney's Firm ID:

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

_____	CIVIL DIVISION
Plaintiff(s)/Landlord	
vs	Case No. _____

Defendant(s)/Tenants(s)	

**PETITION TO OPEN DEFAULT JUDGMENT
FOR FAILURE TO PLEAD**

AND NOW, comes the defendant/tenant, _____, and presents the following Petition to Open Default Judgment for Failure to Plead and in support thereof states as follows:

1. The Plaintiff took a default judgment in the above-captioned action on _____, 20____.
2. As of the date of the default judgment, the undersigned had not yet filed a Notice of Intent to Appear and/or an Answer or other responsive pleading to the complaint filed against the undersigned.
3. As of this date, the undersigned has prepared a Notice of Intent to Appear setting forth and/or providing an accompanying Answer and/or defenses. In accordance with Rule 237.3, a copy of said Notice of Intent to Appear and/or Answer is attached as Exhibit A to this Petition.

4. I was unable to timely file the Notice of Intent to Appear and/or Answer for the following reasons:

5. I am asking the Court to consider the above reasons and grant this Petition.

WHEREFORE, the undersigned respectfully requests this Court to enter an Order granting this Petition to Open Default Judgment for Failure to Plead and authorize the undersigned to immediately file the attached Notice of Intent to Appear and/or Answer.

Date

Signature _____

Print Name _____

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

_____ Plaintiff(s)/Landlord	CIVIL DIVISION
vs	Case No. _____
_____ Defendant(s)/Tenants(s)	

VERIFICATION

I, _____, certify that the facts contained in the foregoing Motion are true and correct to the best of my knowledge, information, and belief. I understand that false statements herein are subject to the penalties of 18 Pa.C.S. §4904 related to unsworn falsification to authorities.

Date

Signature

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

Plaintiff(s)/Landlord

vs

Defendant(s)/Tenants(s)

CIVIL DIVISION

Case No. _____

ORDER OF COURT

AND NOW, this _____ day of _____, 20____, it is

ORDERED that:

BY THE COURT:

_____ J.

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

_____ Plaintiff(s)/Landlord	CIVIL DIVISION
vs.	Case No. _____
_____ Defendant(s)/Tenants(s)	

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the within Petition to Open Default Judgment for Failure to Plead was served this _____ day of _____, 20____, in the following manner: *(Check the appropriate form of service..)* ***If the opposing side is represented by an attorney, the attorney should be served.***

U.S. First Class Mail

Facsimile #: _____

Hand Delivery

Email Address

Landlord/Landlord's Counsel:

Name: _____

Address: _____

Email Address: _____

Telephone: _____

You must include phone number and, if known, email address for served party.

Date

Signature

CERTIFICATE OF COMPLIANCE

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

Submitted by: _____

Signature: _____

Print Name: _____

Attorney No. (if applicable): _____