

SUPERIOR COURT OF PENNSYLVANIA

Carroll S. Dawson (Trustee of the Dawson Family Trust Dated December 5, 1989) v. Sonia Sonju; Carroll S. Dawson (Successor in Interest to William T. Dawson, Deceased) v. Sonia Sonju

Carroll S. Dawson (Trustee of the Dawson Family Trust Dated December 5 1989) v. Sonia Sonju; Carroll S. Dawson (Successor in Interest to William T. Dawson, Deceased) v. Sonia Sonju, 2025 Pa. Super. 175 · No. 2317 EDA 2024; 2340 EDA 2024 · Decided August 13, 2025

SUMMARY

The Pennsylvania Superior Court affirmed Montgomery County orders denying Sonia Sonju’s motions to strike or open two foreign judgments registered under Pennsylvania’s Uniform Enforcement of Foreign Judgments Act. The court held that the 20-year execution period under 42 Pa.C.S. § 5529 begins with entry of the domesticated Pennsylvania judgment, rather than the original California judgment, and that the judgment creditor satisfied the Act’s documentation requirements.

CASE DETAILS

COURT	Superior Court of Pennsylvania
WRITING FOR THE COURT	Dubow, J.; Stabile, J.; Sullivan, J.
JURISDICTION	Pennsylvania Superior Court
DECIDED	August 13, 2025
DOCKET	2317 EDA 2024; 2340 EDA 2024
DISPOSITION	affirmed
PROCEDURAL POSTURE	Consolidated appeals from orders of the Montgomery County Court of Common Pleas denying Sonia Sonju's petitions to strike and/or open two California judgments domesticated in Pennsylvania under the Uniform Enforcement of Foreign Judgments Act.
STANDARD OF REVIEW	Review of the denial of a petition to open and/or strike a foreign judgment is limited to whether the trial court manifestly abused its discretion or committed an error of law. Statutory interpretation is reviewed de novo under a plenary scope of review.
PRECEDENTIAL VALUE	published precedential opinion
PARTIES	Sonia Sonju v. Carroll S. Dawson, Trustee of the Dawson Family Trust Dated December 5, 1989, Carroll S. Dawson, Successor in Interest to

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QUESTIONS PRESENTED

1. Whether Pennsylvania's twenty-year limitation on execution against personal property under 42 Pa.C.S. § 5529(a) runs from the original or renewed foreign judgment or from the date the foreign judgment is domesticated in Pennsylvania.
2. Whether Dawson satisfied 42 Pa.C.S. § 4306(b)'s requirement to file a copy of the foreign judgment and the docket entries incidental thereto.
3. Whether Sonju waived her claim under Pa.R.Civ.P. 3123.1 by failing to include that issue in her Pa.R.A.P. 1925(b) statement.

HOLDINGS

1. For a foreign judgment domesticated under Pennsylvania's Uniform Enforcement of Foreign Judgments Act, the phrase "entry of the judgment upon which the execution is to be issued" in 42 Pa.C.S. § 5529(a) refers to the entry of the domesticated Pennsylvania judgment, not the entry of the original judgment in the foreign state.
2. The appellees satisfied 42 Pa.C.S. § 4306(b) by filing the relevant foreign judgments and docket entries incidental to them; any initial defect in the Case 1 filing was cured by the subsequent attachment of the correct judgment and complete docket entries.
3. Sonju waived her claim that execution violated Pa.R.Civ.P. 3123.1 because she failed to include that issue in her Pa.R.A.P. 1925(b) statement.

KEY QUOTATIONS

"the Pennsylvania judgment is the judgment "upon which the execution is to be issued," 42 Pa.C.S. § 5529(a), given that foreign judgments cannot be executed in Pennsylvania prior to domestication." (at 9)

"the substantial weight of authority holds that the filing of a foreign judgment triggers a new limitations period." (at 10)

"the filing of "docket entries incidental thereto" does not require "that all of the foreign jurisdiction's docket entries must be filed" when domesticating a foreign judgment into Pennsylvania." (at 15)

FACTUAL BACKGROUND

Dawson domesticated in Montgomery County two California judgments against Sonju: a 1993 judgment involving a marital-property award and a 1998 judgment involving trespass damages, costs, and attorney fees. The California judgments had been renewed, and Dawson simultaneously sought execution against Sonju's personal property and financial institutions. Sonju challenged the domestication and execution based on Pennsylvania's twenty-year execution limitation and alleged deficiencies in the filings, but Dawson later attached the correct judgment and complete certified docket entries.

PROCEDURAL HISTORY

Dawson filed praecipes in Montgomery County to domesticate California judgments and obtained writs of execution against Sonju and financial institutions. Sonju moved to strike and/or open the judgments, arguing that execution was barred by Pennsylvania's twenty-year limitation and that Dawson failed to comply with the documentation requirements of the Uniform Enforcement of Foreign Judgments Act. The Court of Common Pleas denied the petitions, and the Superior Court consolidated the appeals and affirmed.

DISPOSITION

affirmed

CASES CITED

- 1650 E. 47th LLC v. 360 Degrees of Perfection, 331 A.3d 63 (Pa. Super. 2025)
- Olympus Corp. v. Canady, 962 A.2d 671 (Pa. Super. 2008)
- Nobel Well Serv., Inc. v. Penn Energy, Inc., 502 A.2d 200 (Pa. Super. 1985)
- Morrissey v. Morrissey, 713 A.2d 614 (Pa. 1998)
- Bonfiglio v. Bonfiglio, 781 A.2d 1197 (Pa. Super. 2001)
- Standard Chartered Bank v. Ahmad Hamad Al Gosaibi & Bros. Co., 99 A.3d 936 (Pa. Super. 2014)
- Czajka v. Holt Graphic Arts, Inc., 310 A.3d 1051 (D.C. 2024) (en banc)
- Stewart v. Stewart, 743 A.2d 955 (Pa. Super. 1999)
- Schmierer v. Tribal Tr., 427 P.3d 143 (N.M. Ct. App. 2018)
- Watkins v. Conway, 385 U.S. 188 (1966)