

2002-1644-CD  
McBride  
Portfolio Recovery Associates, LLC vs Barbara L.

# FILED

OCT 21 2002

William A. Shaw  
Prothonotary

APOTHAKE & ASSOCIATES, P.C.  
BY: David J. Apothaker  
Attorney I.D.#38423  
1341 N. Delaware Avenue, Suite 405  
Philadelphia, PA 19125  
(800) 672-0215  
Attorneys for Plaintiff

PORTFOLIO RECOVERY  
ASSOCIATES, LLC  
120 CORPORATE BLVD STE100  
NORFOLK, VA 23502

Plaintiff,

vs.

BARBARA L. MCBRIDE  
611 HANNAH STREET  
CLEARFIELD, PA 16830

Defendant.

) COURT OF COMMON PLEAS

) CLEARFIELD COUNTY

)

) NO.: 02-1644-CD

)

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## NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action with twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

CLEARFIELD COUNTY BAR ASSOCIATION  
Lawyer Referral and Information Service  
814-765-2641

## **AVISO**

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o con un abogado y entregar a la corte en forma escrita sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademias, la corte puede decidir a favor del edemandante y requiere que usted compla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO. VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

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BY: David J. Apothaker  
Attorney I.D.#38423  
1341 N. Delaware Avenue, Suite 405  
Philadelphia, PA 19125  
(800) 672-0215  
Attorneys for Plaintiff

PORTFOLIO RECOVERY	)	COURT OF COMMON PLEAS
ASSOCIATES,LLC	)	CLEARFIELD COUNTY
120 CORPORATE BLVD STE100	)	
NORFOLK, VA 23502	)	NO.:
Plaintiff,	)	
vs.	)	
BARBARA L. MCBRIDE	)	
611 HANNAH STREET	)	
CLEARFIELD, PA 16830	)	
Defendant.	)	

CIVIL ACTION COMPLAINT  
FIRST COUNT

1. Plaintiff, PORTFOLIO RECOVERY ASSOCIATES, LLC, is a company with its principal place of business located at 120 CORPORATE BLVD STE100 NORFOLK, VA 23502.

2. Defendant is BARBARA L. MCBRIDE, an adult individual residing at 611 HANNAH STREET CLEARFIELD, PA 16830.

3. At the special instance and request of Defendant, Plaintiff sold and delivered to Defendant goods and/or services at the times, of the kinds, in the quantities, and for the prices set forth in Plaintiff's records. A true and correct copy of which is attached hereto, incorporated herein by reference and designated Exhibit "A".

4. Defendant received and accepted the goods and/or services described in Exhibit "A".

5. The prices set forth in Exhibit "A" are the fair, reasonable and market prices for said goods and/or services, and the prices which Defendant agreed to pay.

6. All credits, if any, to which Defendant is entitled, are set forth in Exhibit "A".
7. In addition, Plaintiff avers that Defendant has failed and continues to fail to make any payments, leaving a balance due and owing of \$10,160.48 together with interest from January 11, 2001 in the amount of \$3,210.72.
8. Although demand has been made, Defendant has failed to make payment of the amount due as above.
9. Original creditor is MBNA National Bank.
10. Plaintiff purchased this account from MBNA National Bank.

WHEREFORE, Plaintiff demands judgment in favor of Plaintiff and against Defendant(s) for the sum of \$10,160.48 together with interest from January 11, 2001 in the amount of \$3,210.72, plus costs, interest and reasonable attorney's fees.

APOTHAKE & ASSOCIATES, P.C.  
Attorney for Plaintiff

BY: \_\_\_\_\_

  
David J. Apothaker

Dated: October 9, 2002

Our File No.: 0201167

**VERIFICATION**

David J. Apothaker, Esq. hereby states that I am counsel for plaintiff in this action, and that I am authorized to take this Verification, and that the statements made in the foregoing Civil Action Complaint are true and correct to the best of my knowledge, information, and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 Pa.C.S.A. 4904 relating to unsworn falsification to authorities.

A handwritten signature in black ink, appearing to be 'D. Apothaker', written over a horizontal line.

David J. Apothaker, Esq.  
Attorney for Plaintiff

DATE: October 9, 2002

**Account Information**

Account: 5490992999428992  
 Balance Due: \$ 10,160.48  
 Product: MC  
 Seller: MBNA AMERICA BANK /  
 Interest Rate: 23.00

Last Payment: 1/11/2001  
 Open Date: 11/26/1997  
 Charge Off Date: 4/27/2001  
 Interest Date: 10/31/2001

**Primary Debtor**

Name: BARBARA L MCBRIDE  
 Address: 611 HANNAH ST CLEARFIELD, PA 168300000  
 Employer:  
 Garn Address:  
 Bank: CLEARFIELD BK & TR  
 Attorney:

SSN: 182-44-2347  
 Home #: XXX-765-9426  
 Work #:

**Secondary Debtor**

Name:  
 Address:  
 Employer:  
 Garn Address:  
 Bank:  
 Attorney:

SSN:  
 Home #:  
 Work #:

**Property Information**

#1: PRIMARY RESIDENCE DOS

Name on Deed: BARBARA MCBRIDE

Mtg Holder:

Tax Assessor:

Date Verified:

Date Assessed:

Mtg Amt:

Assessed Amt:

#2:

Name on Deed:

Mtg Holder:

Tax Assessor:

Date Verified:

Date Assessed:

Mtg Amt:

Assessed Amt:

#3:

Name on Deed:

Mtg Holder:

Tax Assessor:

Date Verified:

Date Assessed:

Mtg Amt:

Assessed Amt:

#4:

Name on Deed:

Mtg Holder:

Tax Assessor:

Date Verified:

Date Assessed:

Mtg Amt:

Assessed Amt:

#5:

Name on Deed:

Mtg Holder:

Tax Assessor:

Date Verified:

Date Assessed:

Mtg Amt:

Assessed Amt:

#6:

Name on Deed:

Mtg Holder:

Tax Assessor:

Date Verified:

Date Assessed:

Mtg Amt:

Assessed Amt:

#7:

Name on Deed:

Mtg Holder:

Tax Assessor:

Date Verified:

Date Assessed:

Mtg Amt:

Assessed Amt:

#8:

Name on Deed:

Mtg Holder:

Tax Assessor:

Date Verified:

Date Assessed:

Mtg Amt:

Assessed Amt:

#9:

Name on Deed:

Mtg Holder:

Tax Assessor:

Date Verified:

Date Assessed:

Mtg Amt:

Assessed Amt:

Suit is to be filed under the name of: PRA III, LLC

12-5-02 Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.

  
Deputy Prothonotary

**FILED**

OCT 21 2002

31143-84

pd. 80.00

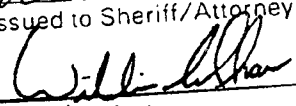
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William A. Shaw  
Prothonotary

Atty David Apostolakis



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Attorney for Plaintiff

12-5-02 Document  
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for service.  
  
Deputy Prothonotary

PORTFOLIO RECOVERY  
ASSOCIATES, LLC

Plaintiff,

vs.

BARBARA L. MCBRIDE


Defendant.

) COURT OF COMMON PLEAS  
) CLEARFIELD COUNTY  
)  
)  
)  
) NO.: 02-1644-CD  
)  
)  
)  
)  
)

PRAECIPE TO  
REINSTATE COMPLAINT - CIVIL ACTION

TO THE PROTHONOTARY:

Kindly reinstate the Complaint in the above captioned Civil Action for an additional  
thirty (30) days.

  
\_\_\_\_\_  
David J. Apothaker, Esquire  
Attorney for Plaintiff

Dated: December 2, 2002

Our File No.: 0201167

**FILED**

DEC 05 2002

William A. Shaw  
Prothonotary



**In The Court of Common Pleas of Clearfield County, Pennsylvania**

Sheriff Docket # 13198

PORTFOLIO RECOVERY ASSOCIATES

02-1644-CD

VS.

MCBRIDE, BARBARA L.

COMPLAINT

**SHERIFF RETURNS**

NOW DECEMBER 20, 2002 AT 1:10 PM EST SERVED THE WITHIN COMPLAINT ON BARBARA L. MCBRIDE, DEFENDANT AT THE SSHERIFF'S OFFICE, MARKET STREET, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO BARBARA MCBRIDE A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN TO HER THE CONTENTS THEREOF.  
SERVED BY: COUDRIET

**Return Costs**

Cost	Description
36.00	SHFF. HAWKINS PD. BY: ATTY.
10.00	SURCHARGE PAID BY: ATTY.

Sworn to Before Me This

30th Day Of January 2003  
William A. Shaw

*Rep*

So Answers,

Chester A. Hawkins  
by Mary Hamr  
Chester A. Hawkins  
Sheriff

**FILED**

JAN 30 2003

William A. Shaw  
Prothonotary

COP

12-5-02

APOTHAKE & ASSOCIATES, P.C.  
 BY: David J. Apothaker  
 Attorney I.D.#38423  
 1341 N. Delaware Avenue, Suite 405  
 Philadelphia, PA 19125  
 (800) 672-0215  
 Attorney for Plaintiff

Reinstated/Reissued for service.

*William L. Brown*  
 Deputy Prothonotary

PORTFOLIO RECOVERY  
 ASSOCIATES, LLC

Plaintiff,

vs.

BARBARA L. MCBRIDE

Defendant.

) COURT OF COMMON PLEAS  
 ) CLEARFIELD COUNTY  
 )  
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 )  
 ) NO.: 02-1644-CD  
 )  
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 thirty (30) days.

*David J. Apothaker*  
 David J. Apothaker, Esquire  
 Attorney for Plaintiff

Dated: December 2, 2002

Our File No.: 0201167

I hereby certify this to be a true  
 and attested copy of the original  
 statement filed in this case.

DEC 05 2002

Attest.

*William L. Brown*  
 Prothonotary/  
 Clerk of Courts

3201167

APOTHAKE & ASSOCIATES, P.C.  
BY: David J. Apothaker  
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Attorneys for Plaintiff

FILED

OCT 21 2002  
William A. Shaw  
Prothonotary

PORTFOLIO RECOVERY  
ASSOCIATES, LLC  
120 CORPORATE BLVD STE100  
NORFOLK, VA 23502

Plaintiff,

vs.

BARBARA L. MCBRIDE  
611 HANNAH STREET  
CLEARFIELD, PA 16830

Defendant.

) COURT OF COMMON PLEAS  
) CLEARFIELD COUNTY

) NO.: 02-1644-CD

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Lawyer Referral and Information Service  
814-765-2641

AVISO

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Attorneys for Plaintiff

PORTFOLIO RECOVERY	)	COURT OF COMMON PLEAS
ASSOCIATES, LLC	)	CLEARFIELD COUNTY
120 CORPORATE BLVD STE100	)	
NORFOLK, VA 23502	)	NO.:
Plaintiff,	)	
vs.	)	
BARBARA L. MCBRIDE	)	
611 HANNAH STREET	)	
CLEARFIELD, PA 16830	)	
Defendant.	)	

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FIRST COUNT

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2. Defendant is BARBARA L. MCBRIDE, an adult individual residing at 611 HANNAH STREET CLEARFIELD, PA 16830.

3. At the special instance and request of Defendant, Plaintiff sold and delivered to Defendant goods and/or services at the times, of the kinds, in the quantities, and for the prices set forth in Plaintiff's records. A true and correct copy of which is attached hereto, incorporated herein by reference and designated Exhibit "A".

4. Defendant received and accepted the goods and/or services described in Exhibit "A".

5. The prices set forth in Exhibit "A" are the fair, reasonable and market prices for said goods and/or services, and the prices which Defendant agreed to pay.

6. All credits, if any, to which Defendant is entitled, are set forth in Exhibit "A".

7. In addition, Plaintiff avers that Defendant has failed and continues to fail to make any payments, leaving a balance due and owing of \$10,160.48 together with interest from January 11, 2001 in the amount of \$3,210.72.

8. Although demand has been made, Defendant has failed to make payment of the amount due as above.

9. Original creditor is MBNA National Bank.

10. Plaintiff purchased this account from MBNA National Bank.

WHEREFORE, Plaintiff demands judgment in favor of Plaintiff and against Defendant(s) for the sum of \$10,160.48 together with interest from January 11, 2001 in the amount of \$3,210.72, plus costs, interest and reasonable attorney's fees.

APOTHAKE & ASSOCIATES, P.C.  
Attorney for Plaintiff

BY: \_\_\_\_\_

  
David J. Apothaker

Dated: October 9, 2002

Our File No.: 0201167

### Account Information

Account: 5490992999428992  
Balance Due: \$ 10,160.48  
Product: MC  
Seller: MBNA AMERICA BANK /  
Interest Rate: 23.00

Last Payment: 1/11/2001  
Open Date: 11/26/1997  
Charge Off Date: 4/27/2001  
Interest Date: 10/31/2001

### Primary Debtor

Name: BARBARA L MCBRIDE  
Address: 611 HANNAH ST CLEARFIELD, PA 168300000  
Employer:  
Garn Address:  
Bank: CLEARFIELD BK & TR  
Attorney:

SSN: 182-44-2347  
Home #: XXX-765-9426  
Work #:

### Secondary Debtor

Name:  
Address:  
Employer:  
Garn Address:  
Bank:  
Attorney:

SSN:  
Home #:  
Work #:

### Property Information

#1: PRIMARY RESIDENCE DOS  
Name on Deed: BARBARA MCBRIDE  
Mtg Holder:  
Tax Assessor:

Date Verified:  
Date Assessed:      Mtg Amt:  
Assessed Amt:

#2:  
Name on Deed:  
Mtg Holder:  
Tax Assessor:

Date Verified:  
Date Assessed:      Mtg Amt:  
Assessed Amt:

#3:  
Name on Deed:  
Mtg Holder:  
Tax Assessor:

Date Verified:  
Date Assessed:      Mtg Amt:  
Assessed Amt:

#4:  
Name on Deed:  
Mtg Holder:  
Tax Assessor:

Date Verified:  
Date Assessed:      Mtg Amt:  
Assessed Amt:

#5:  
Name on Deed:  
Mtg Holder:  
Tax Assessor:

Date Verified:  
Date Assessed:      Mtg Amt:  
Assessed Amt:

#6:  
Name on Deed:  
Mtg Holder:  
Tax Assessor:

Date Verified:  
Date Assessed:      Mtg Amt:  
Assessed Amt:

#7:  
Name on Deed:  
Mtg Holder:  
Tax Assessor:

Date Verified:  
Date Assessed:      Mtg Amt:  
Assessed Amt:

#8:  
Name on Deed:  
Mtg Holder:  
Tax Assessor:

Date Verified:  
Date Assessed:      Mtg Amt:  
Assessed Amt:


#9:  
Name on Deed:  
Mtg Holder:  
Tax Assessor:

Date Verified:  
Date Assessed:      Mtg Amt:  
Assessed Amt:

Suit is to be filed under the name of: PRA III, LLC

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\_\_\_\_\_  
David J. Apothaker, Esq.  
Attorney for Plaintiff

DATE: October 9, 2002

APOTHAKE &amp; ASSOCIATES, P.C.

BY: David J. Apothaker

Attorney I.D.#38423

1341 N. Delaware Avenue, Suite 405

Philadelphia, PA 19125

(800) 672-0215

Attorney for Plaintiff

COPY

12-5-02  
Reinstated/Reissued  
for service.

Deputy Prothonotary

PORTFOLIO RECOVERY  
ASSOCIATES, LLC

Plaintiff,

vs.

BARBARA L. MCBRIDE

Defendant.

) COURT OF COMMON PLEAS

) CLEARFIELD COUNTY

)

)

)

) NO.: 02-1644-CD

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PRAECIPE TO  
REINSTATE COMPLAINT - CIVIL ACTION

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Attorney for Plaintiff

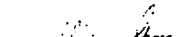
Dated: December 2, 2002

Our File No.: 0201167

I hereby certify this to be a true  
and attested copy of the original  
statement filed in this case.

DEC 05 2002

Attest.

  
Deputy Prothonotary/  
Clerk of Courts



201167

APOTHAKER & ASSOCIATES, P.C.  
BY: David J. Apothaker  
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Philadelphia, PA 19125  
(800) 672-0215  
Attorneys for Plaintiff

FILED

OCT 21 2002  
William A. Shaw  
Prothonotary

PORTFOLIO RECOVERY	) COURT OF COMMON PLEAS
ASSOCIATES, LLC	) CLEARFIELD COUNTY
120 CORPORATE BLVD STE100	)
NORFOLK, VA 23502	) NO.: 02-1644-CD
Plaintiff,	)
vs.	)
BARBARA L. MCBRIDE	)
611 HANNAH STREET	)
CLEARFIELD, PA 16830	)
Defendant.	)
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Attorneys for Plaintiff

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ASSOCIATES, LLC	)	CLEARFIELD COUNTY
120 CORPORATE BLVD STE100	)	
NORFOLK, VA 23502	)	NO.:
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vs.	)	
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Attorney for Plaintiff

BY: \_\_\_\_\_

  
David J. Apothaker

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Interest Rate: 23.00

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Open Date: 11/26/1997  
Charge Off Date: 4/27/2001  
Interest Date: 10/31/2001

**Primary Debtor**

Name: BARBARA L MCBRIDE  
Address: 611 HANNAH ST CLEARFIELD, PA 168300000  
Employer:  
Garn Address:  
Bank: CLEARFIELD BK & TR  
Attorney:

SSN: 182-44-2347  
Home #: XXX-765-9426  
Work #:

**Secondary Debtor**

Name:  
Address:  
Employer:  
Garn Address:  
Bank:  
Attorney:

SSN:  
Home #:  
Work #:

**Property Information**

#1: PRIMARY RESIDENCE DOS  
Name on Deed: BARBARA MCBRIDE

Mtg Holder:  
Tax Assessor:

Date Verified:                      Mtg Amt:  
Date Assessed:                      Assessed Amt:

#2:

Name on Deed:  
Mtg Holder:  
Tax Assessor:

Date Verified:                      Mtg Amt:  
Date Assessed:                      Assessed Amt:

#3:

Name on Deed:  
Mtg Holder:  
Tax Assessor:

Date Verified:                      Mtg Amt:  
Date Assessed:                      Assessed Amt:

#4:

Name on Deed:  
Mtg Holder:  
Tax Assessor:

Date Verified:                      Mtg Amt:  
Date Assessed:                      Assessed Amt:

#5:

Name on Deed:  
Mtg Holder:  
Tax Assessor:

Date Verified:                      Mtg Amt:  
Date Assessed:                      Assessed Amt:

#6:

Name on Deed:  
Mtg Holder:  
Tax Assessor:

Date Verified:                      Mtg Amt:  
Date Assessed:                      Assessed Amt:

#7:

Name on Deed:  
Mtg Holder:  
Tax Assessor:

Date Verified:                      Mtg Amt:  
Date Assessed:                      Assessed Amt:

#8:

Name on Deed:  
Mtg Holder:  
Tax Assessor:

Date Verified:                      Mtg Amt:  
Date Assessed:                      Assessed Amt:

#9:

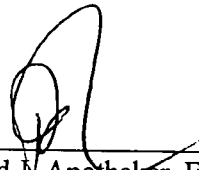
Name on Deed:  
Mtg Holder:  
Tax Assessor:

Date Verified:                      Mtg Amt:  
Date Assessed:                      Assessed Amt:

Suit is to be filed under the name of: PRA III, LLC

**VERIFICATION**

David J. Apothaker, Esq. hereby states that I am counsel for plaintiff in this action, and that I am authorized to take this Verification, and that the statements made in the foregoing Civil Action Complaint are true and correct to the best of my knowledge, information, and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 Pa.C.S.A. 4904 relating to unsworn falsification to authorities.

  
\_\_\_\_\_  
David J. Apothaker, Esq.  
Attorney for Plaintiff

DATE: October 9, 2002

APOTHAKE & ASSOCIATES, P.C.

BY: David J. Apothaker

Attorney I.D.#38423

1341 N. Delaware Avenue, Suite 405

Philadelphia, PA 19125

(800) 672-0215

Attorney for Plaintiff

12-5-02  
Reinstated/Reissued for service.

*William L. Brown*  
Deputy Prothonotary

PORTFOLIO RECOVERY  
ASSOCIATES, LLC

Plaintiff,

vs.

BARBARA L. MCBRIDE

Defendant.

) COURT OF COMMON PLEAS

) CLEARFIELD COUNTY

)

)

)

) NO.: 02-1644-CD

)

)

)

)

)

)

PRAECIPE TO  
REINSTATE COMPLAINT - CIVIL ACTION

TO THE PROTHONOTARY:

Kindly reinstate the Complaint in the above captioned Civil Action for an additional  
thirty (30) days.

*David J. Apothaker*

David J. Apothaker, Esquire  
Attorney for Plaintiff

Dated: December 2, 2002

Our File No.: 0201167

I hereby certify this to be a true  
and attested copy of the original  
statement filed in this case.

DEC 05 2002

Attest.

*William L. Brown*  
Prothonotary/  
Clerk of Courts

201167

APOTHAKE & ASSOCIATES, P.C.  
BY: David J. Apothaker  
Attorney I.D.#38423  
1341 N. Delaware Avenue, Suite 405  
Philadelphia, PA 19125  
(800) 672-0215  
Attorneys for Plaintiff

FILED

OCT 21 2002

William A. Shaw  
Prothonotary

PORTFOLIO RECOVERY  
ASSOCIATES, LLC  
120 CORPORATE BLVD STE100  
NORFOLK, VA 23502

Plaintiff,

vs.

BARBARA L. MCBRIDE  
611 HANNAH STREET  
CLEARFIELD, PA 16830

Defendant.

) COURT OF COMMON PLEAS

) CLEARFIELD COUNTY

)

) NO.: 02-1644-CD

)

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#### NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action with twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

CLEARFIELD COUNTY BAR ASSOCIATION  
Lawyer Referral and Information Service  
814-765-2641

#### AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o con un abogado y entregar a la corte en forma escrita sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del edemandante y requiere que usted compla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO. VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

CLEARFIELD COUNTY BAR ASSOCIATION  
Lawyer Referral and Information Service  
814-765-2641

APOTHAKER & ASSOCIATES, P.C.  
BY: David J. Apothaker  
Attorney I.D.#38423  
1341 N. Delaware Avenue, Suite 405  
Philadelphia, PA 19125  
(800) 672-0215  
Attorneys for Plaintiff

PORTFOLIO RECOVERY	)	COURT OF COMMON PLEAS
ASSOCIATES, LLC	)	CLEARFIELD COUNTY
120 CORPORATE BLVD STE100	)	
NORFOLK, VA 23502	)	NO.:
Plaintiff,	)	
vs.	)	
BARBARA L. MCBRIDE	)	
611 HANNAH STREET	)	
CLEARFIELD, PA 16830	)	
Defendant.	)	
	)	

**CIVIL ACTION COMPLAINT  
FIRST COUNT**

1. Plaintiff, PORTFOLIO RECOVERY ASSOCIATES, LLC, is a company with its principal place of business located at 120 CORPORATE BLVD STE100 NORFOLK, VA 23502.

2. Defendant is BARBARA L. MCBRIDE, an adult individual residing at 611 HANNAH STREET CLEARFIELD, PA 16830.

3. At the special instance and request of Defendant, Plaintiff sold and delivered to Defendant goods and/or services at the times, of the kinds, in the quantities, and for the prices set forth in Plaintiff's records. A true and correct copy of which is attached hereto, incorporated herein by reference and designated Exhibit "A".

4. Defendant received and accepted the goods and/or services described in Exhibit "A".

5. The prices set forth in Exhibit "A" are the fair, reasonable and market prices for said goods and/or services, and the prices which Defendant agreed to pay.



6. All credits, if any, to which Defendant is entitled, are set forth in Exhibit "A".

7. In addition, Plaintiff avers that Defendant has failed and continues to fail to make any payments, leaving a balance due and owing of \$10,160.48 together with interest from January 11, 2001 in the amount of \$3,210.72.

8. Although demand has been made, Defendant has failed to make payment of the amount due as above.


9. Original creditor is MBNA National Bank.

10. Plaintiff purchased this account from MBNA National Bank.

WHEREFORE, Plaintiff demands judgment in favor of Plaintiff and against Defendant(s) for the sum of \$10,160.48 together with interest from January 11, 2001 in the amount of \$3,210.72, plus costs, interest and reasonable attorney's fees.

APOTHAKE & ASSOCIATES, P.C.  
Attorney for Plaintiff

BY: \_\_\_\_\_

  
David J. Apothaker

Dated: October 9, 2002

Our File No.: 0201167

**Account Information**

Account: 5490992999428992  
Balance Due: \$ 10,160.48  
Product: MC  
Seller: MBNA AMERICA BANK /  
Interest Rate: 23.00

Last Payment: 1/11/2001  
Open Date: 11/26/1997  
Charge Off Date: 4/27/2001  
Interest Date: 10/31/2001

**Primary Debtor**

Name: BARBARA L MCBRIDE  
Address: 611 HANNAH ST CLEARFIELD, PA 168300000  
Employer:  
Garn Address:  
Bank: CLEARFIELD BK & TR  
Attorney:

SSN: 182-44-2347  
Home #: XXX-765-9426  
Work #:

**Secondary Debtor**

Name:  
Address:  
Employer:  
Garn Address:  
Bank:  
Attorney:

SSN:  
Home #:  
Work #:

**Property Information**

**#1: PRIMARY RESIDENCE DOS**

Name on Deed: BARBARA MCBRIDE

Mtg Holder:

Tax Assessor:

Date Verified:

Date Assessed:

Mtg Amt:

Assessed Amt:

**#2:**

Name on Deed:

Mtg Holder:

Tax Assessor:

Date Verified:

Date Assessed:

Mtg Amt:

Assessed Amt:

**#3:**

Name on Deed:

Mtg Holder:

Tax Assessor:

Date Verified:

Date Assessed:

Mtg Amt:

Assessed Amt:

**#4:**

Name on Deed:

Mtg Holder:

Tax Assessor:

Date Verified:

Date Assessed:

Mtg Amt:

Assessed Amt:

**#5:**

Name on Deed:

Mtg Holder:

Tax Assessor:

Date Verified:

Date Assessed:

Mtg Amt:

Assessed Amt:

**#6:**

Name on Deed:

Mtg Holder:

Tax Assessor:

Date Verified:

Date Assessed:

Mtg Amt:

Assessed Amt:

**#7:**

Name on Deed:

Mtg Holder:

Tax Assessor:

Date Verified:

Date Assessed:

Mtg Amt:

Assessed Amt:

**#8:**

Name on Deed:

Mtg Holder:

Tax Assessor:

Date Verified:

Date Assessed:

Mtg Amt:

Assessed Amt:

**#9:**

Name on Deed:

Mtg Holder:

Tax Assessor:

Date Verified:

Date Assessed:


Mtg Amt:

Assessed Amt:

Suit is to be filed under the name of: PRA III, LLC

**VERIFICATION**

David J. Apothaker, Esq. hereby states that I am counsel for plaintiff in this action, and that I am authorized to take this Verification, and that the statements made in the foregoing Civil Action Complaint are true and correct to the best of my knowledge, information, and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 Pa.C.S.A. 4904 relating to unsworn falsification to authorities.



---

David J. Apothaker, Esq.  
Attorney for Plaintiff

DATE: October 9, 2002

APOTHAKER & ASSOCIATES, P.C.  
1341 N. Delaware Avenue, Suite 405  
Philadelphia, PA 19125  
(800) 672-0215  
Attorneys for Plaintiff  
David J. Apothaker, Esquire  
Attorney ID #38423

PORTFOLIO RECOVERY  
ASSOCIATES, LLC  
120 CORPORATE BLVD STE100  
NORFOLK, VA 23502

Plaintiff,

vs.

BARBARA L. MCBRIDE  
611 HANNAH STREET  
CLEARFIELD PA 16830

Defendant.

) COURT OF COMMON PLEAS OF  
) CLEARFIELD COUNTY  
)  
)  
)

) NO.: 02-1644-CD  
)  
)  
)  
)  
)

Civil Action

**FILED**

MAR 07 2003

6/22/03/103 *Shaw*  
William A. Shaw  
Prothonotary  
NOTICE TO DEPT  
ICEN  
+ ICEN TO DEPT

**PRAECIPE TO ENTER DEFAULT JUDGMENT**

TO THE PROTHONOTARY:

Please enter a default judgment in favor of plaintiff, PORTFOLIO RECOVERY ASSOCIATES, LLC and against Defendant, BARBARA L. MCBRIDE, for failure to answer or otherwise respond to the Complaint - Civil Action.

The Complaint was served upon the defendants on December 20, 2002 by the CLEARFIELD Sheriff's Department. Copies of the proofs of service are attached hereto as Exhibit "A".

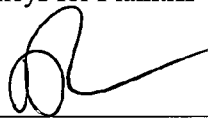
A copy of the Notice of Intention To Take Default was mailed on February 10, 2003, and also attached hereto.

Assess damages in the amount of:

(a)	Balance:	\$13,371.20
(b)	Interest from October 9, 2002 to February 24, 2003:	\$ 230.48
	TOTAL	\$ 13,601.68

APOTHAKER & ASSOCIATES, P.C.  
Attorneys for Plaintiff

By:



David J. Apothaker

Dated: February 24, 2003

Our File No.: 0201167

APOTHAKER & ASSOCIATES, P.C.  
BY: David J. Apothaker  
Attorney I.D.#38423  
1341 N. Delaware Avenue, Suite 405  
Philadelphia, PA 19125  
(800) 672-0215  
Attorney for Plaintiff

PORTFOLIO RECOVERY	)	COURT OF COMMON PLEAS
ASSOCIATES, LLC	)	CLEARFIELD COUNTY
120 CORPORATE BLVD STE100	)	
NORFOLK, VA 23502	)	
	)	
Plaintiff,	)	NO. 02-1644-CD
vs.	)	
BARBARA L. MCBRIDE	)	
611 HANNAH STREET	)	
CLEARFIELD PA 16830	)	
Defendant.	)	
	)	

**NOTICE OF INTENTION  
TO TAKE DEFAULT**

TO: BARBARA L. MCBRIDE

DATE OF NOTICE: February 10, 2003

**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 as set forth above, 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:

CLEARFIELD COUNTY BAR ASSOCIATION  
Lawyer Referral and Information Service  
814-765-2641



---

DAVID J. APOTHAKER, ESQUIRE  
1341 N. Delaware Avenue, Suite 405  
Philadelphia, PA 19125  
(800) 672-0215  
Attorney for Plaintiff  
Attorney ID #38423

Our File No.: 0201167

In The Court of Common Pleas of Clearfield County, Pennsylvania

PORTFOLIO RECOVERY ASSOCIATES

VS.

MCBRIDE, BARBARA L.

02-1644-CD

Sheriff Docket # 13198

COPY

COMPLAINT

SHERIFF RETURNS

NOW DECEMBER 20, 2002 AT 1:10 PM EST SERVED THE WITHIN COMPLAINT ON BARBARA L. MCBRIDE, DEFENDANT AT THE SHERIFF'S OFFICE, MARKET STREET, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO BARBARA MCBRIDE A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN TO HER THE CONTENTS THEREOF.  
SERVED BY: COUDRIET

Return Costs

Cost	Description
36.00	SHFF. HAWKINS PD. BY: ATTY.
10.00	SURCHARGE PAID BY: ATTY.

Sworn to Before Me This

\_\_\_\_\_ Day Of \_\_\_\_\_ 2003

So Answers,



Chester A. Hawkins  
Sheriff



**OFFICE OF THE PROTHONOTARY  
COURT OF COMMON PLEAS**

TO: BARBARA L. MCBRIDE  
611 HANNAH STREET  
CLEARFIELD PA 16830

PORTFOLIO RECOVERY  
ASSOCIATES, LLC  
120 CORPORATE BLVD STE100  
NORFOLK, VA 23502

Plaintiff,

vs.

BARBARA L. MCBRIDE  
611 HANNAH STREET  
CLEARFIELD PA 16830

Defendant.

) COURT OF COMMON PLEAS OF  
) CLEARFIELD COUNTY

) NO.: 02-1644-CD

) Civil Action

NOTICE

Pursuant to Rule 236 of the Supreme Court of Pennsylvania, you are hereby notified that a Judgment has been entered against you in the above proceeding as indicated below.

XX JUDGMENT BY DEFAULT

\_\_\_ JUDGMENT IN REPLEVIN

\_\_\_ JUDGMENT BY CONFESSION

\_\_\_ JUDGMENT FOR POSSESSION

\_\_\_ JUDGMENT ON AWARD OF ARBITRATORS

\_\_\_ JUDGMENT ON VERDICT

\_\_\_ JUDGMENT ON COURT FINDINGS

\_\_\_ JUDGMENT ON WRIT OF REVIVAL

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE, PLEASE CALL:

ATTORNEY David J. Apothaker, Esq. at this telephone number: 800-672-0215


APOTHAKER & ASSOCIATES, P.C.  
BY: David J. Apothaker  
Attorney I.D.#38423  
1341 N. Delaware Avenue, Suite 405  
Philadelphia, PA 19125  
(800) 672-0215  
Attorney for Plaintiff

PORTFOLIO RECOVERY	)	COURT OF COMMON PLEAS OF
ASSOCIATES, LLC	)	CLEARFIELD COUNTY
120 CORPORATE BLVD STE100	)	
NORFOLK, VA 23502	)	
Plaintiff,	)	
vs.	)	NO.: 02-1644-CD
BARBARA L. MCBRIDE	)	
611 HANNAH STREET	)	Civil Action
CLEARFIELD PA 16830	)	
Defendant.	)	

**AFFIDAVIT OF NON-MILITARY SERVICE**

COMMONWEALTH OF PENNSYLVANIA :  
: SS.  
COUNTY OF CLEARFIELD :

David J. Apothaker, being duly sworn according to law, deposes and says that I am the attorney for Plaintiff, and authorized to make this affidavit; that Defendant(s) resides at 611 HANNAH STREET CLEARFIELD PA 16830; and that Defendant(s) 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 Sailors' Civil Relief Act of 1940 and amendments thereto.

  
\_\_\_\_\_  
David J. Apothaker  
Attorney for Plaintiff

The above signed understands that the statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

**FILED**

MAR 07 2003

William A. Shaw  
Prothonotary

**FILED**

FEB 28 2003

William A. Shaw  
Prothonotary

NOTICE OF JUDGMENT

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

CIVIL DIVISION

Portfolio Recovery Associates, LLC

Vs.

No. 2002-01644-CD

Barbara L. McBride

To: DEFENDANT(S)

NOTICE is given that a JUDGMENT in the above captioned matter has been entered against you in the amount of \$1,3601.68 on the March 7, 2003.

William A. Shaw  
Prothonotary

---

William A. Shaw

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY ,  
PENNSYLVANIA  
STATEMENT OF JUDGMENT

Portfolio Recovery Associates, LLC  
Plaintiff(s)

No.: 2002-01644-CD

Real Debt: \$13,601.68

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Barbara L. McBride  
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: March 7, 2003

Expires: March 7, 2008

Certified from the record this March 7, 2003

\_\_\_\_\_  
William A. Shaw, Prothonotary

\*\*\*\*\*

SIGN BELOW FOR SATISFACTION

Received on \_\_\_\_\_, \_\_\_\_\_, of defendant full satisfaction of this Judgment,  
Debt, Interest and Costs and Prothonotary is authorized to enter Satisfaction on the same.

\_\_\_\_\_  
Plaintiff/Attorney