

03-1036-CD

NCO PROFFOLIO MANAGEMENT, INC. vs. WINIFRED L. PROTHERO

THIS IS AN ARBITRATION MATTER.
ASSESSMENT OF DAMAGES HEARING
REQUIRED.

GORDON & WEINBERG, P.C.
BY: FREDERIC I. WEINBERG, ESQUIRE
Identification No.: 41360
21 SOUTH 21ST STREET
PHILADELPHIA, PA 19103
215/988-9600

| | | |
|--------------------------------|---|------------------------|
| NCO PORTFOLIO MANAGEMENT, INC. | : | |
| ASSIGNEE OF CHEVY CHASE BANK | : | COURT OF COMMON PLEAS |
| 1804 WASHINGTON BLVD. | : | CLEARFIELD COUNTY |
| BALTIMORE, MD 21230 | : | |
| vs. | : | DOCKET NO.: 03-1036-cd |
| WINIFRED L. PROTHERO | : | |
| 325 W LONG AVE. | : | |
| DU BOIS PA 15801 | : | |

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 WITHIN 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 JUDGEMENT 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 ONCE. 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.

PENNSYLVANIA BAR ASSOCIATION
LAWYER REFERRAL SERVICES
P.O. BOX 186
HARRISBURG, PA 17108
(800) 692-7375

FILED

JUL 16 2003

*William A. Shaw
Prothonotary*

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ASSESSMENT OF DAMAGES HEARING
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| 1804 WASHINGTON BLVD. | : | CLEARFIELD COUNTY |
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| | : | |
| vs. | : | DOCKET NO.: |
| | : | |
| WINIFRED L. PROTHERO | : | |
| 325 W LONG AVE. | : | |
| DU BOIS PA 15801 | : | |

COMPLAINT IN CIVIL-ACTION

1. At all times relevant hereto, the defendant(s) was the holder of a credit card, which at the request of the defendant(s) was issued to the defendant(s) by the plaintiff's predecessor in interest, under the terms of which the plaintiff agreed to extend to defendant(s) the use of plaintiff's credit facilities.

2. Defendant(s) accepted and used the aforesaid credit card so issued and by so doing agreed to perform the terms and conditions prescribed by the plaintiff for the use of said credit card.

3. The defendant(s) received and accepted goods and merchandise and/or accepted services or cash advances through the use of the credit card issued by the Plaintiff.

4. All the credits to which the defendant(s) is entitled have been applied and there remains a balance due in the amount of \$2,644.40.

5. Plaintiff has made demand upon the defendant(s) for payment of the balance due of \$2,644.40 but the defendant(s) has failed and refused and still refuses to pay the same or any part thereof.

WHEREFORE, plaintiff claims of the defendant(s) the sum of \$2,644.40, plus 24% interest, court costs, and attorney's fees all of which is justly due and owing from defendant(s) to plaintiff.

GORDON & WEINBERG, P.C.

BY: 

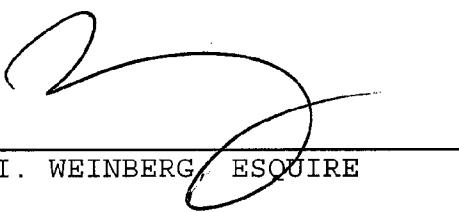
~~FREDERIC I. WEINBERG, ESQUIRE~~
Attorney for Plaintiff

P01A

VERIFICATION

FREDERIC I. WEINBERG, ESQUIRE, hereby states that he is the attorney for the Plaintiff(s) in this action and verifies that the statements made in the foregoing pleading are true and correct to the best of his knowledge, information and belief.

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


FREDERIC I. WEINBERG, ESQUIRE

FILED

in 11-24 1st pd 95-00
100 to 600
JUL 16 2003
1 CLE to SMT

William A. Shaw
Prothonotary

Date: 07/24/2003

Clearfield County Court of Common Pleas

NO. 1863458

Time: 08:46 AM

Receipt

Page 1 of 1

Received of: Weinberg, Frederic I. (attorney for NCO Portfolio)

\$ 0.00

Zero and 00/100 Dollars

| Case: 2003-01036-CD | Plaintiff: NCO Portfolio Management, Inc. | Amount |
|-----------------------------|---|-------------|
| Civil Complaint Billable | | 0.00 |
| Total: | | 0.00 |

PL 7/25/03

Payment Method: Cash

William A. Shaw, Prothonotary/Clerk of Courts

By:

Deputy Clerk

Clerk: BILLSHAW

Duplicate

In The Court of Common Pleas of Clearfield County, Pennsylvania

NCO PORTFOLIO MANAGEMENT INC

VS.

PROTHERO, WINIFRED L.

COMPLAINT

Sheriff Docket #

14346

03-1036-CD

SHERIFF RETURNS

NOW JULY 24, 2003 AT 10:00 AM SERVED THE WITHIN COMPLAINT ON WINIFRED L. PROTHERO, DEFENDANT AT EMPLOYMENT, 325 W. LONG AVE., DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO WINIFRED L. PROTHERO A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN TO HER THE CONTENTS THEREOF.

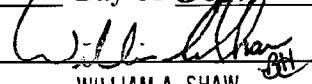
SERVED BY: RYEN

Return Costs

| Cost | Description |
|--------------|---|
| 31.68 | SHERIFF HAWKINS PAID BY: ATTY CK# 3126 |
| 10.00 | SURCHARGE PAID BY: ATTY CK# 3127 |

Sworn to Before Me This

2nd Day Of Sept 2003


WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

So Answers,


Chester A. Hawkins
Sheriff

FILED

03/17/01
SEP 02 2003

William A. Shaw
Prothonotary/Clerk of Courts

FILED

1:47 pd ad 00
BA 100 Notice to Def
Stip to set off

NOV 01 2003

GORDON & WEINBERG, P.C.
BY: FREDERIC I. WEINBERG
Identification No. 41360
21 S. 21ST Street
Philadelphia, PA 19103
(215) 988-9600

William A. Shaw
Prothonotary
Attorney for Plaintiff

NCO PORTFOLIO MANAGEMENT, INC.
ASSIGNEE OF CHEVY CHASE BANK

: COURT OF COMMON PLEAS
: CLEARFIELD COUNTY

vs.

: NO. 03-1036-CD

WINIFRED L. PROTHERO

JUDGMENT BY AGREEMENT

AND NOW, this 13th day of September 2003, it is hereby stipulated and agreed to by and between WINIFRED L. PROTHERO, HER SUCCESSORS AND ASSIGNS and FREDERIC I. WEINBERG, Esquire, counsel for NCO PORTFOLIO MANAGEMENT, INC. ASSIGNEE OF CHEVY CHASE BANK that the Court enter a determination in the above-captioned case as follows:

1. Judgment shall be entered in the amount of **TWO THOUSAND EIGHT HUNDRED AND NINETY-NINE DOLLARS AND FORTY CENTS (\$2,899.40)** in favor of NCO PORTFOLIO MANAGEMENT, INC. ASSIGNEE OF CHEVY CHASE BANK and against WINIFRED L. PROTHERO, HER SUCCESSORS AND ASSIGNS;
2. Plaintiff, NCO PORTFOLIO MANAGEMENT, INC. ASSIGNEE OF CHEVY CHASE BANK, will agree to accept the sum of \$50.00 per month from WINIFRED L. PROTHERO, HER SUCCESSORS AND ASSIGNS. The first payment of \$50.00 per month

shall become due and payable on October 1, 2003 and then on the first of every month thereafter until the Stipulated Judgment is paid in full; There will be a review of the account every 6 months for a possible increase in the monthly payment.

3. In the event that **WINIFRED L. PROTHERO, HER SUCCESSORS AND ASSIGNS** do not make payments as prescribed in paragraph 2, they will be considered in default and the Plaintiff, **NCO PORTFOLIO MANAGEMENT, INC. ASSIGNEE OF CHEVY CHASE BANK** shall be allowed to exercise any and all remedies available at law.

4. The Parties to this action have authorized their respective counsel and agent to enter into this agreement on their behalf and by doing so this agreement will be binding on both **WINIFRED L. PROTHERO, HER SUCCESSORS AND ASSIGNS** and **NCO PORTFOLIO MANAGEMENT, INC. ASSIGNEE OF CHEVY CHASE BANK , ITS SUCCESSORS AND ASSIGNS.**

Date: 9/13/03

Winifred L. Prothero
WINIFRED L. PROTHERO
Defendant

Date: 9-13-03


FREDERIC I. WEINBERG, Esquire
Attorney for Plaintiff
I.D. #41360
21 South 21st Street
Phila, PA 19103

BY THE COURT:

J.

GORDON & WEINBERG, P.C.
BY: FREDERIC I. WEINBERG
Identification No. 41360
21 S. 21ST Street
Philadelphia, PA 19103
(215) 988-9600

Attorney for Plaintiff

NCO PORTFOLIO MANAGEMENT, INC. : COURT OF COMMON PLEAS
ASSIGNEE OF CHEVY CHASE BANK : CLEARFIELD COUNTY

vs.

: NO. 03-1036-CD

WINIFRED L. PROTHERO

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Date: 9/13/03

Winifred L. Prothero
WINIFRED L. PROTHERO
Defendant

Date: 9/13/03

Frederic I. Weinberg
FREDERIC I. WEINBERG, Esquire
Attorney for Plaintiff
I.D. #41360
21 South 21st Street
Phila., PA 19103

BY THE COURT:

J.

NOTICE OF JUDGMENT

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

CIVIL DIVISION

NCO Portfolio Management, Inc.

Vs.

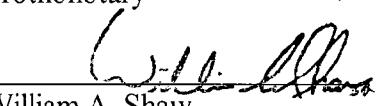
No. 2003-01036-CD

Winifred L. Prothero

To: DEFENDANT(S)

NOTICE is given that a JUDGMENT in the above captioned matter has been entered against you in the amount of \$2,899.40 on the November 3, 2003.

William A. Shaw
Prothonotary


William A. Shaw

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

NCO Portfolio Management, Inc.
Plaintiff(s)

No.: 2003-01036-CD

Real Debt: \$2,899.40

Atty's Comm: \$

Vs. Costs: \$

Int. From: \$

Winifred L. Prothero
Defendant(s)

Entry: \$20.00

Instrument: Agreement Judgment

Date of Entry: November 3, 2003

Expires: November 3, 2008

Certified from the record this 3rd day of November, 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