

05-938-CD

2005-938-CD
Palisades Collection et al v. Terry Miller

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION LLC : NO.
 ASSIGNEE OF BANK ONE :
 210 SYLVAN AVENUE :
 ENGLEWOOD CLIFFS, NJ 07632 :

Plaintiff :

VS. :

TERRI L MILLIRON :

535 SOUTH AVE
DU BOIS PA 15801-1545 :

Defendant(s) :

05-938-CD

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 (20) days after this Complaint and Notice are served, by entering a written appearance personally or by an 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 or any other claim or relief requested by the Plaintiff. You may lose money or property 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 HELP. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

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NOTICIA

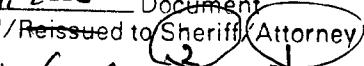
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Feb 17, 2006

Document

Reinstated/Reissued to Sheriff/Attorney for service.



Deputy Prothonotary

PA Lawyer Referral Service
 Pennsylvania Bar Assn.
 P.O. Box 186

Harrisburg
 800-692-7375

PA 17108

FILED ^{ICC}
 M 12:34 AM Shaff
 JUN 29 2005 ^{Att'y pd.}
 William A. Shaw
 Prothonotary/Clerk of Courts ⁸⁵⁰⁰

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION LLC : NC.
ASSIGNEE OF BANK ONE :
210 SYLVAN AVENUE :
ENGLEWOOD CLIFFS, NJ 07632 :
:
Plaintiff :
VS. : CIVIL ACTION - LAW
TERRI L MILLIRON :
:
535 SOUTH AVE :
DU BOIS PA 15801-1545 :
:
Defendant(s) :

COMPLAINT

Now comes the Plaintiff, PALISADES COLLECTION LLC , by and through its attorneys, and the law firm of Wolpoff & Abramson, L.L.P., and files this Complaint and in support avers as follows:

1. Plaintiff, PALISADES COLLECTION LLC
ASSIGNEE OF BANK ONE
210 SYLVAN AVENUE
ENGLEWOOD CLIFFS, NJ 07632

is a business entity doing business within the Commonwealth of Pennsylvania and the other states of the United States.

2. Defendant, TERRI L MILLIRON , is an adult individual with a last known address of

535 SOUTH AVE
DU BOIS PA 15801-1545

COUNTY OF CLEARFIELD

3. It is averred that Defendant(s) was/were issued an open end credit card account.

4. At all relevant times material hereto, Defendant(s) has/have used said charge card for the purchase of products, goods and/or for obtaining services.

5. Plaintiff provided Defendant(s) with copies of the Statements of Account showing all debits and credits for transactions on the aforementioned credit card account to which there was no bona fide objection by Defendant(s). A true and correct copy of the Statement of Account is attached hereto, incorporated herein, and marked as Exhibit "A".

6. As of the date of this Complaint, the remaining balance due, owing and unpaid on Defendant's credit card account as a result of the charges made by said Defendant(s) and/or any authorized users is the sum of \$ 14158.09.

7. Pursuant to the applicable Pennsylvania law, any unpaid or delinquent balances on said account shall continue to bear interest at the rate of 18%.

8. As of the date of the filing of this Complaint, the amount of interest which has accrued is the sum of \$ 8622.86.

9. Despite reasonable and repeated demands for payment, Defendant(s) has/have refused and continue to refuse to pay all sums due and owing on the aforementioned account balance, all to the damage and detriment of the Plaintiff.

10. The amount in controversy exceeds the jurisdictional amount requiring compulsory arbitration.

WHEREFORE, Plaintiff respectfully requests this Honorable Court enter Judgment in favor of the Plaintiff and against Defendant(s) in the amount of \$ 14158.09, plus interest in the amount of \$ 8622.86, plus costs of this action and any other relief as this Court deems just and reasonable.

Respectfully submitted,

Philip C Warholic

Amy F. Doyle	#87062
Daniel F. Wolfson	#20617
Bruce H. Cherkis	#18837
Philip C. Warholic	#86341
Ronald M. Abramson	#94266
Ronald S. Canter	#94000
Donald P. Shiffer	#89451
Andrew C. Spears	#87737
WOLPOFF & ABRAMSON, L.L.P. / Counsel for Plaintiff	
Attorneys in the Practice of Debt Collection	
4660 Trindle Road, 3rd Floor, Camp Hill, PA 17011	
(717) 303-6700	

ATTORNEY VERIFICATION

I hereby state that I am the attorney for the Plaintiff, who is located outside of this jurisdiction and in order to file the within document in an expedient and timely manner, am authorized to take this verification on behalf of said Plaintiff in this action and verify that the statements made in the foregoing Complaint are true and correct to the best of my knowledge, information, and belief, based upon information provided by the Plaintiff.

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

Date:



Amy F. Doyle #87062
Daniel F. Wolfson #20617
Bruce H. Cherkis #18837
Philip C. Warholic #86341
Ronald M. Abramson #94266
Ronald S. Canter #94000
Donald F. Shiffer #89451
Andrew C. Spears #87737
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Attorneys in the Practice of Debt Collection
4660 Trindle Road, 3rd Floor, Camp Hill, PA 17011
(717) 303-6700

18536

EXHIBIT "A"

24184 File Number 134378020 Media Number 04364013535 Account Number 4417168676900230
C1ient Reference Num = 4417168676900230
PROVIDER PALISADES COLLECTION LLC ASSIGNEE OF BANK

Plaintiff = 356178
Client Reference Num = 4417168676900230
Current Balance = 14158.09
LSTPYNTDT = 20010819
C/O DATE = 20011231
Last Name = MILLIRON
First Name = TERRI
Middle Name = L
Addr1 = 535 SOUTH AVE
Addr2 =
City = DU BOIS
State = PA
Zip = 15801
Phone1 = 8143754598
Phone2 = 0000000000
SSN = 205547301
DOB =
Last Name =
First Name =
Middle Name =
Co-maker Addr1 =
Co-maker Addr2 =
Co-maker City =
Co-maker State =
Co-maker Zip =
Co-maker Phone1 =
Co-maker Phone2 =
Co-maker SSN =
Debtor Number = 9845186
OPEN DATE =
DOS = 2005
=

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 1 of 1 Services

Sheriff Docket #

100602

PALISADES COLLECTION LLC

Case # 05-938-CD

VS.

TERRI L. MILLIRON

SHERIFF RETURNS

NOW August 12, 2005 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT "NOT FOUND" AS TO TERRI L. MILLIRON, DEFENDANT. SEVERAL ATTEMPTS, NOT HOME.

SERVED BY: /

Return Costs

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	WOLPOFF	872187	10.00
SHERIFF HAWKINS	WOLPOFF	872186	75.00

FILED

AUG 12 2005

0/2306

William A. Shaw

Prothonotary/Clerk of Courts

Sworn to Before me This

So Answers,

____ Day of _____ 2005

*Chester A. Hawkins
by Marlynn Harris*
Chester A. Hawkins
Sheriff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION LLC : NO.
 ASSIGNEE OF BANK ONE :
 210 SYLVAN AVENUE :
 ENGLEWOOD CLIFFS, NJ 07632 :

Plaintiff :

05-938-CD

VS. :

CIVIL ACTION - LAW

TERRI L MILLIRON :

I hereby certify this to be a true
and attested copy of the original
statement filed in this case.535 SOUTH AVE
DU BOIS PA 15801-1545 :

JUN 29 2005

Defendant(s) :

Attest.


 William C. Brown
 Prothonotary/
 Clerk of Courts

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Plaintiff

VS. : CIVIL ACTION - LAW
TERRI L MILLIRON :
535 SOUTH AVE :
DU BOIS PA 15801-1545 :
:

Defendant(s)

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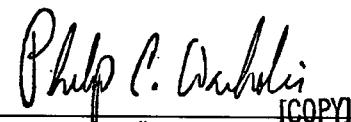
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[COPY]

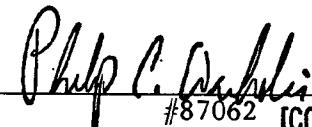
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Date:



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18538

EXHIBIT "A"

24186 File Number 134378020 Media Number 04364013535 Account Number 4417168676900230
PROVIDER PALISADES COLLECTION LLC ASSIGNEE OF BANK

Plaintiff = 356178
Client Reference Num = 4417168676900230
Client = BONES2
Current Balance = 14158.09
LSTPYMTDT = 20010819
C/O DATE = 20011231
Last Name = MILLIRON
First Name = TERRI
Middle Name = L
Addr1 = 535 SOUTH AVE
Addr2 =
City = DU BOIS
State = PA
Zip = 15801
Phone1 = 8143754598
Phone2 = 0000000000
SSN = 205547301
DOB =
Last Name =
First Name =
Middle Name =
Co-maker Addr1 =
Co-maker Addr2 =
Co-maker City =
Co-maker State =
Co-maker Zip =
Co-maker Phone1 =
Co-maker Phone2 =
Co-maker SSN =
DOB =
Debtor Number = 9845186
OPEN DATE =
00S = 2005
=

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION LLC

Plaintiff

NO. 05938CD

vs.

CIVIL ACTION - LAW

TERRI L MILLIRON

Defendant

PRAECIPE TO REINSTATE

To the Prothonotary:

Kindly reinstate the complaint in the above-referenced matter.

Respectfully Submitted,


Amy F. Doyle #87062
Daniel F. Wolfson #20617
Philip C. Warholic #86341
Andrew C. Spears #87737
David R. Galloway #87326
Tonilyn M. Chippie #87852
Ronald M. Abramson #94266
Ronald S. Canter #94000
Bruce H. Cherkis #18837
WOLPOFF & ABRAMSON, LLP
Attorneys in the Practice of Debt Collection
4660 Trindle Rd., 3rd Floor
Camp Hill, PA 17011
(717) 303-6700

Date: 2/14/06

W&A File No. 134378020

FILED

FEB 17 2006

m (3:15/4)

William A. Shaw
Prothonotary/Clerk of Courts

2 cent to Atty

*2 REINSTATEMENT COUN. TO
SHFF*

1 REINSTATEMENT TO ATTY

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101270
NO: 05-938-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: PALISADES COLLECTION LLC
vs.
DEFENDANT: TERRI L. MILLIRON

SHERIFF RETURN

NOW, March 03, 2006 AT 3:05 PM SERVED THE WITHIN COMPLAINT ON TERRI L. MILLIRON DEFENDANT AT 535 SOUTH AVE., DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO TERRI L. MILLIRON, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: COUDRIET / DEHAVEN

FILED
APR 10 2006
WAM

William A. Shaw
Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	WOLPOFF	145816	10.00
SHERIFF HAWKINS	WOLPOFF	145816	25.91

Sworn to Before Me This

Day of 2006

So Answers,

*Chester A. Hawkins
by Marilyn Hawn*
Chester A. Hawkins
Sheriff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION LLC
ASSIGNEE OF BANK ONE
210 SYLVAN AVENUE
ENGLEWOOD CLIFFS, NJ 07632

: NO. **COPY**

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

: 05-938CD

FEB 17 2006

Plaintiff

Attest.

William A. Shaw
Prothonotary/Clerk of Courts

VS.

TERRI L MILLIRON

535 SOUTH AVE
DU BOIS PA 15801-1545

: CIVIL ACTION - LAW

Defendant(s)

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PA Lawyer Referral Service
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134378020

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Deputy Prothonotary

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PA 17108

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18537

EXHIBIT "A"

FILE NUMBER 1343/8020

MEDIA NUMBER 04364013535

ACCOUNT NUMBER 441/1686/6900230
PROVIDER PALISADES COLLECTION LLC ASSIGNEE OF BANK

PAGE 1

Plaintiff = 356178
Client Reference Num = 4417168676900230
Client = BCNE52
Current Balance = 14158.09
LSTPYMTDT = 20010819
C/O DATE = 20011231
Last Name = MILLIRON
First Name = TERRI
Middle Name = L
Addr1 = 535 SOUTH AVE
Addr2 =
City = DU BOIS
State = PA
Zip = 15801
Phone1 = 8143754598
Phone2 = 0000000000
SSN = 205547301
DOB =
Last Name =
First Name =
Middle Name =
Co-maker Addr1 =
Co-maker Addr2 =
Co-maker City =
Co-maker State =
Co-maker Zip =
Co-maker Phone1 =
Co-maker Phone2 =
Co-maker SSN =
DOB =
Debtor Number = 9845186
OPEN DATE =
005 = 2005
=

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION LLC : NO. 05938CD
 ASSIGNEE OF BANK ONE :
 210 SYLVAN AVENUE :
 ENGLEWOOD CLIFFS, NJ 07632 :
 :
 Plaintiff :
 vs. :
 TERRI L MILLIRON :
 Defendant(s) :
 :
 PRAECIPE FOR JUDGMENT

FILED Atty pd.
 11:55 AM 26.00
 MAY 08 2006 REC Notice
 to Def.

William A. Shaw
 Prothonotary/Clerk of Courts
 Statement
 to Atty
 (6K)

Mr./Ms. Clerk:

Please enter Judgment in favor of Plaintiff and against Defendant(s),
 TERRI L MILLIRON and ,
 for want of ANSWER TO COMPLAINT.

(X)	Amount due	\$ 14158.09
	Interest	\$ 8622.86
	Attorney's Commission	\$
	Filing costs	\$
	TOTAL	\$22780.95, plus interest and costs

(X) I certify that the foregoing assessment of damages is for specified amounts alleged to be due in the complaint and is calculable as a sum certain from the complaint.

(X) Pursuant to Pa.R.C.P. 237 (Notice of Praeclipe for final judgment or decree), I certify that a copy of this praecipe has been mailed to each other party who has appeared in the action or to his/her Attorney of Record.

(X) Pursuant to Pa.R.C.P. 237.1, 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 days prior to the date of the filing of this praecipe and a copy of the notice is attached.

DATE: 4/24/06 Signature:

Philip C. Warholic
 Amy F. Doyle #87062 / Daniel F. Wolfson #20617
 Philip C. Warholic #86341 / Andrew C. Spears #87737
 David R. Galloway #87326 / Tonilyn M. Chippie #87852
 Ronald M. Abramson #94266 / Ronald S. Canter #94000
 Bruce H. Cherkis #18837
 WOLPOFF & ABRAMSON, L.L.P. / Counsel for Plaintiff
 Attorneys in the Practice of Debt Collection
 4660 Trindle Road, 3rd Floor, Camp Hill, PA 17011
 (717) 303-6700

NOW, May 8, 2006, JUDGMENT IS ENTERED AS ABOVE.

William A. Shaw
 Prothonotary/Clerk, Civil Division

By: _____ Deputy

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION LLC	:	No. 05938CD
ASSIGNEE OF BANK ONE	:	
210 SYLVAN AVENUE	:	
ENGLEWOOD CLIFFS, NJ 07632	:	
	:	
	:	
Plaintiff	:	
	:	
vs.	:	CIVIL ACTION - LAW
	:	
TERRI L MILLIRON	:	
	:	
Defendant(s)	:	

CERTIFICATE OF RESIDENCE
PA. R.C.P. 236

I, hereby certify that the precise residence of Plaintiff is:

PALISADES COLLECTION LLC
ASSIGNEE OF BANK ONE
210 SYLVAN AVENUE
ENGLEWOOD CLIFFS, NJ 07632

and certify that the last known address of the within Defendant(s) is:

TERRI L MILLIRON
535 SOUTH AVE
DU BOIS PA 15801



Amy F. Doyle #87062 / Daniel F. Wolfson #20617
 Philip C. Warholic #86341 / Andrew C. Spears #87737
 David R. Galloway #87326 / Tonilyn M. Chippie #87852
 Ronald M. Abramson #94266 / Ronald S. Canter #94000
 Bruce H. Cherkis #18837
 WOLPOFF & ABRAMSON, L.L.P. / Counsel for Plaintiff
 Attorneys in the Practice of Debt Collection
 4660 Trindle Road, 3rd Floor, Camp Hill, PA 17011
 (717) 303-6700

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION LLC : No. 05938CD
 ASSIGNEE OF BANK ONE :
 210 SYLVAN AVENUE :
 ENGLEWOOD CLIFFS, NJ 07632 :
 :
 Plaintiff :
 :
 vs. : CIVIL ACTION - LAW
 :
 TERRI L MILLIRON :
 :
 Defendant(s) :

AFFIDAVIT OF NON-MILITARY SERVICE

COMMONWEALTH OF PENNSYLVANIA :
 :
 COUNTY OF CUMBERLAND :
 :

The undersigned counsel, being duly sworn according to law, depose and say that I am the Attorney for the Plaintiff in the above-captioned matter, and that to the best of my knowledge, information and belief Defendant, TERRI L MILLIRON, above-named, is over 21 years of age; is last known to reside at 535 SOUTH AVE
 DU BOIS PA 15801

County of CLEARFIELD , Pennsylvania; is not in the military service of the United States or its Allies, or otherwise within the provisions of the Servicemembers Civil Relief Act and its Amendments.

Philip C Warholic
 Amy F. Doyle #87062 / Daniel F. Wolfson #20617
 Philip C. Warholic #86341 / Andrew C. Spears #87737
 David R. Galloway #87326 / Tonilyn M. Chippie #87852
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 4660 Trindle Road, 3rd Floor, Camp Hill, PA 17011
 (717) 303-6700

COMMONWEALTH OF PENNSYLVANIA
 Notarial Seal
 Kimberly L. Eisenhauer, Notary Public
 Hampden Twp., Cumberland County
 My Commission Expires Nov. 17, 2009
 Member, Pennsylvania Association of Notaries

SWORN and SUBSCRIBED to before me this 21 day of April, 2006.

Kimberly L. Eisenhauer
 Notary Public

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION LLC
ASSIGNEE OF BANK ONE

: NO. 05938CD

Plaintiff

:

vs.

CIVIL ACTION - LAW

TERRI L MILLIRON

:

Defendant(s)

:

NOTICE OF JUDGMENT

(x) Notice is hereby given that a
 in the above-captioned matter has been entered against you in the amount of
 \$32780.95, plus interest, on May 8, 2006.

(x) A copy of all documents filed with the Prothonotary in support of the
 within judgment is/are attached.



Prothonotary Civil Division

By: _____

If you have any questions regarding this Notice, please contact the
 filing party.



 Amy F. Doyle #87062 / Daniel F. Wolfson #20617
 Philip C. Warholic #86341 / Andrew C. Spears #87737
 David R. Galloway #87326 / Tonilyn M. Chippie #87852
 Ronald M. Abramson #94266 / Ronald S. Canter #94000
 Bruce H. Cherkis #18837
 WOLPOFF & ABRAMSON, L.L.P. / Counsel for Plaintiff
 Attorneys in the Practice of Debt Collection
 4660 Trindle Road, 3rd Floor, Camp Hill, PA 17011
 (717) 303-6700

(This Notice is given in accordance with Pa.R.C.P. 236.)

NOTICE SENT TO:

TERRI L MILLIRON

535 SOUTH AVE
DU BOIS PA 15801

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

Palisades Collection, LLC
Bank One
Plaintiff(s)

No.: 2005-00938-CD

Real Debt: \$22,780.95

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Terri L. Milliron
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: May 8, 2006

Expires: May 8, 2011

Certified from the record this 8th day of May, 2006.



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