

05-938-CD

Palisades Collection et al v. Terri Milliron  
2005-938-CD

## 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.

:

:

:

Plaintiff

:

VS.

CIVIL ACTION - LAW

:

TERRI L MILLIRON

:

535 SOUTH AVE

DU BOIS PA 15801-1545

:

:

Defendant(s)

## 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.

*G. Oll*  
 Deputy Prothonotary

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

Harrisburg  
 800-692-7375

PA 17108

FILED *icc*  
*m/2:34pm shff*  
 JUN 29 2005 *8500*  
 William A. Shaw  
 Prothonotary/Clerk of Courts

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535 SOUTH AVE

DU BOIS PA 15801-1545

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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  
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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%.

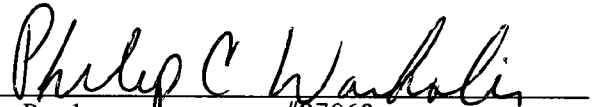
8. As of the date of the filing of this Complaint, the amount of interest which has accrued is the sum of \$ 8622.86.

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,



Amy F. Doyle	#87062
Daniel F. Wolfson	#20617
Bruce H. Cherkis	#18837
Philip C. Warholick	#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:



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(717) 303-6700

EXHIBIT "A"

24184  
File Number 134378020 Media Number 04364013535 Account Number 4417168676900230  
PROVIDER PALISADES COLLECTION LLC ASSIGNEE OF BANK

PAGE 1

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 =  
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** *LM*

AUG 12 2005

*0/2:30h*  
William A. Shaw

Prothonotary/Clerk of Courts

Sworn to Before me This

\_\_\_\_\_ Day of \_\_\_\_\_ 2005

So Answers,

*Chester A. Hawkins*  
*by Mandy Hamre*

Chester A. Hawkins  
Sheriff



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VS.

CIVIL ACTION - LAW

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TERRI L MILLIRON

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535 SOUTH AVE

DU BOIS PA 15801-1545

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Defendant(s)

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

JUN 29 2005

Attest.

*William L. Shaw*  
 Prothonotary/  
 Clerk of Courts

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*Philip C. Warholick*

[COPY]

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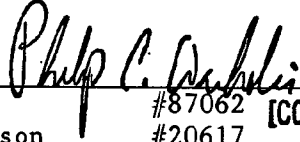
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Date:

  
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Daniel F. Wolfson #20617  
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18538

EXHIBIT "A"

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Client Reference Num = 4417168676900230  
Client = BONES2  
Current Balance = 14158.09  
LSTPYMTDT = 20010819  
C/O DATE = 20011231  
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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 =  
DOS = 2005  
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IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION LLC  
Plaintiff

NO. 05938CD

vs.

CIVIL ACTION - LAW


TERRIL 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., 3<sup>rd</sup> Floor  
Camp Hill, PA 17011  
(717) 303-6700

Date: 2/14/06

W&A File No. 134378020

**FILED**

FEB 17 2006

m (3:15/6)

William A. Shaw  
Prothonotary/Clerk of Courts

2 CERT TO ATTY

2 REINSTATEMENT COMPL. TO

SHFF

1 REINSTATE 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  
0190938  
APR 10 2006  
William A. Shaw  
Prothonotary/Clerk of Courts

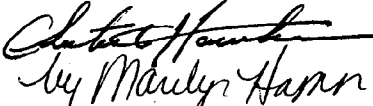
PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	WOLPOFF	145816	10.00
SHERIFF HAWKINS	WOLPOFF	145816	25.91

Sworn to Before Me This

\_\_\_\_\_ Day of \_\_\_\_\_ 2006

\_\_\_\_\_

So Answers,

  
Chester A. Hawkins  
Sheriff



## IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

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Plaintiff

VS.

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535 SOUTH AVE  
 DU BOIS PA 15801-1545

Defendant(s)

NO. COPY

I hereby certify this to be a true  
 and attested copy of the original  
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05-938 CD

FEB 17 2006

Attest.

*William A. Shaw*  
 Prothonotary/  
 Clerk of Courts

CIVIL ACTION - LAW

FILED

JUN 29 2005

*William A. Shaw*  
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*William A. Shaw*  
 Deputy Prothonotary

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PA 17108

134378020

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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

18537

EXHIBIT "A"

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File Number 1343/8020 Media Number 04364013535 Account Number 4417168676900230  
PROVIDER PALISADES COLLECTION LLC ASSIGNEE OF BANK

PAGE 1

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 =  
DOS = 2005  
=

## 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. 05938CD

:

:

:

Plaintiff

vs.

:

TERRI L MILLIRON

:

Defendant(s)

:

## PRAECIPE FOR JUDGMENT

**FILED** *Atty. pd.*  
*7/11/35*  
**MAY 08 2006** *26.00*  
*REC'd Notice*  
*to Def.*

William A. Shaw  
 Prothonotary/Clerk of Courts

*Statement*  
*to Atty*  
 (6)

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 Praecipe 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  
 ASSIGNEE OF BANK ONE  
 210 SYLVAN AVENUE  
 ENGLEWOOD CLIFFS, NJ 07632

: No. 05938CD

:

:

:

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. Warholik #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  
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## 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. 05938CD

:

:

:

Plaintiff

:

vs.

CIVIL ACTION - LAW

:

TERRI L MILLIRON

:

Defendant(s)

## AFFIDAVIT OF NON-MILITARY SERVICE

COMMONWEALTH OF PENNSYLVANIA

:

COUNTY OF CUMBERLAND

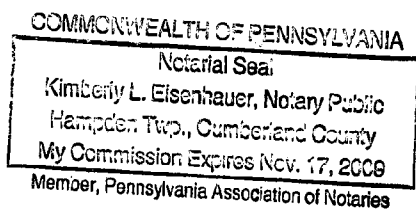
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The undersigned counsel, being duly sworn according to law, depose and say that I am the Attorney for the Plaintiff in the above-captioned matter, and that to the best of my knowledge, information and belief Defendant, TERRI L MILLIRON, above-named, 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. Warhol*  
 Amy F. Doyle #87062 / Daniel F. Wolfson #20617  
 Philip C. Warhol #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



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

Plaintiff

vs.

TERRI L MILLIRON

Defendant(s)

: NO. 05938CD

:

:

CIVIL ACTION - LAW

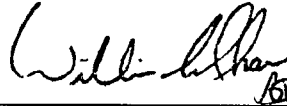
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## NOTICE OF JUDGMENT

( x ) Notice is hereby given that a  
in the above-captioned matter has been entered against you in the amount of  
\$ 3280.95, plus interest, on May 8, 2006.

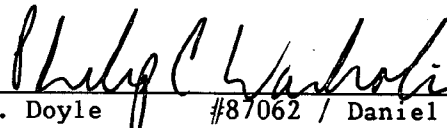
( x ) A copy of all documents filed with the Prothonotary in support of the  
within judgment is/are attached.



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. Warhol #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

CC. 1

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)

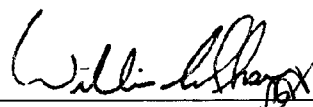
Entry: \$20.00

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