

05-1112-CD  
Worldwide Asset Purchasing vs Lori Bortot  
2005-1112-CD

Worldwide Asset Purchasing vs Lori Bortot  
2005-1112-CD

BURTON NEIL & ASSOCIATES, P.C.  
By: Burton Neil, Esquire  
Identification No. 11348  
1060 Andrew Drive, Suite 170  
West Chester, PA 19380  
(610) 696-2120  
Attorney for Plaintiff

FILED 100  
MJD:45/21 Shff  
AUG 01 2005 Atty pd. 85.00  
William A. Shaw  
Prothonotary Clerk of Courts

WORLDWIDE ASSET PURCHASING LLC  
9911 Covington Cross Dr.  
Las Vegas NV 89144

: IN THE COURT OF COMMON PLEAS

Plaintiff

: CLEARFIELD COUNTY, PENNSYLVANIA

v.

: NO. 05-1112-CD

Defendant

: CIVIL ACTION - LAW

**COMPLAINT  
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 attorney and filing in writing with the court your defenses or objections to the claim 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 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. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.**

**IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.**

**LAWYER REFERENCE AND  
INFORMATION SERVICE**

David S. Meholic

Court Administrator

Clearfield County Courthouse

Clearfield, PA 16830

Telephone No. 814-765-2641 Ext. 5982

BURTON NEIL & ASSOCIATES, P.C.

By: Burton Neil, Esquire  
Identification No. 11348  
1060 Andrew Drive, Suite 170  
West Chester, PA 19380  
(610) 696-2120  
Attorney for Plaintiff

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WORLDWIDE ASSET PURCHASING LLC  
9911 Covington Cross Dr.  
Las Vegas NV 89144

Plaintiff  
v.

: IN THE COURT OF COMMON PLEAS

: CLEARFIELD COUNTY, PENNSYLVANIA

: NO.

Lori L. Bortot  
110 N 2nd Street, Clearfield, PA  
Defendant

: CIVIL ACTION - LAW

### **Complaint**

1. The plaintiff is WORLDWIDE ASSET PURCHASING LLC , a business corporation, with place of business located at 9911 Covington Cross Dr., Las Vegas NV.
2. The defendant is Lori L Bortot, who resides at 110 N 2nd Street, Clearfield, Clearfield County, Pennsylvania.
3. At the defendant's request, Direct Merchants Bank furnished consumer credit to defendant bearing account number 5458001254016714 hereinafter referred to as the credit card account.
4. The defendant accepted the credit card account by making purchases, balance transfers and/or cash advances.
5. Monthly statements were sent to defendant each month which detailed the charges and credits made to the credit card account for the prior month.
6. The balance due on the credit card account is \$7,774.80.
7. Defendant did not pay the balance due on the credit card account in full upon receipt of the monthly billing statements and also did not make the required minimum monthly payment set forth in the monthly billing statement. As such, defendant is in default on the credit card account.
8. Plaintiff purchased the defendant's account from Direct Merchants Bank and is now the holder and owner of the account.
9. Although demand has been made by plaintiff upon defendant to pay the sum of \$7,774.80, the defendant failed and refused to pay all or any part thereof.

Wherefore, plaintiff demands judgment against the defendant in the sum of \$7,774.80 and the costs of this action.

BURTON NEIL & ASSOCIATES, P.C.

By: John Doe

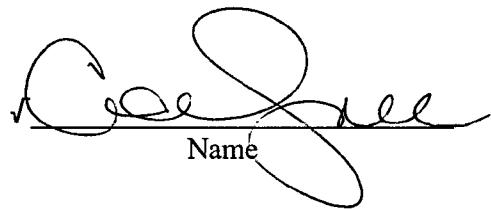
Burton Neil, Esquire  
Attorney for Plaintiff

The law firm of Burton Neil & Associates, P.C. is a debt collector.

**Verification**

**Chanel Soares is Attorney Relationship Manager** for , the within Plaintiff, and makes this statement on its behalf as to the truthfulness of the facts set forth in the foregoing Complaint subject to the penalties of 18 Pa. C.S. Section 4904, relating to unsworn falsification to authorities.

Date: 6/20/05



A handwritten signature in black ink, appearing to read "Chanel Soares". Below the signature, the word "Name" is printed in a small, sans-serif font.

Lori L Bortot  
5458001254016714

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100690  
NO: 05-1112-CD  
SERVICE # 1 OF 1  
COMPLAINT

PLAINTIFF: WORLDWIDE ASSET PURCHASING LLC  
VS.  
DEFENDANT: LORI L. BORTOT

SHERIFF RETURN

NOW, August 26, 2005 AT 2:55 PM SERVED THE WITHIN COMPLAINT ON LORI L. BORTOT DEFENDANT AT 110 N. 2ND ST., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO JOHN LHOTA, ATTORNEY FOR DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: HAWKINS /

FILED  
08:55 AM  
DEC 08 2005  
WILLIAM A. SHAW  
PROTHONOTARY/CLERK OF COURTS

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	NEIL	11990	10.00
SHERIFF HAWKINS	NEIL	11989	24.37

Sworn to Before Me This

So Answers,

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

*Chester A. Hawkins*  
*by Marlys Harker*  
Chester A. Hawkins  
Sheriff

WORLDWIDE ASSET PURCHASING LLC  
9911 Covington Cross Dr., Las Vegas NV 89144  
Plaintiff

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

VS.

Lori L. Bortot  
110 North 2nd Street  
Clearfield PA 16830

Defendant

: NO. 05-1112-CD

: CIVIL ACTION - LAW

**Praecipe for Default Judgment**

To the Prothonotary:

Please enter judgment by default for want of an answer in the above case in favor of the plaintiff and against the defendant, and assess damages as follows:

Principal: \$7,774.80

TOTAL \$7,774.80

Understanding that false statements herein made are subject to penalty under 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities, I verify that:

1. The above are the precise last-known addresses of the judgment debtor and creditor.
2. The annexed notice of intention to file this praecipe was mailed to all parties against whom judgment is to be entered and to their record attorneys, if any, after the default occurred, and at least ten days prior to the date of the filing of this praecipe.
3. Pursuant to Section 201(b)(1)(A) of the Servicemembers Civil Relief Act of 2003 (SCRA), the defendant is not in the military service of the United States based on information received from the defendant and/or the Department of Defense website.

**JUDGMENT BY DEFAULT ENTERED  
AND DAMAGES ASSESSED AS ABOVE.  
NOTICE GIVEN UNDER PA.R.CIV.P. 236**

  
\_\_\_\_\_  
Pro Prothonotary

BURTON NEIL & ASSOCIATES, P.C.

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

Burton Neil, Esquire  
Attorney for Plaintiff  
I.D. #11348  
1060 Andrew Drive, Suite 170  
W. Chester, PA 19380

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60264



WORLDWIDE ASSET PURCHASING LLC

: IN THE COURT OF COMMON PLEAS

Plaintiff  
vs.: CLEARFIELD COUNTY, PENNSYLVANIA  
: NO. 05-1112-CD

LORI L. BORTOT

Defendant

: CIVIL ACTION - LAW

**Notice of Intention to File Praeclipe for Default Judgment**TO: Lori L Bortot  
110 North 2nd Street  
Clearfield PA 16830**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 obligations to the claims set forth against you. Unless you act within ten (10) days from the date of this notice, 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 your 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. This office can provide you with information about hiring a lawyer.

If you cannot afford to hire a lawyer, this office may be able to provide you with information about agencies that may offer legal services to eligible persons at a reduced fee or no fee.

**LAWYER REFERENCE AND  
INFORMATION SERVICE**  
David S. Meholick  
Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
Telephone No. 814-765-2641 Ext. 5982

DATE OF NOTICE: December 13, 2005

BURTON NEIL &amp; ASSOCIATES, P.C.

By: \_\_\_\_\_  
Burton Neil, Esquire  
Attorney for Plaintiff  
Identification No. 11348  
1060 Andrew Drive, Suite 170  
West Chester, PA 19380  
(610) 696-2120

In making this communication, we advise our office is a  
debt collector.

cc: John Lhota, Esquire  
110 N. 2nd Street  
Clearfield, PA 16830



BURTON NEIL & ASSOCIATES, P.C.

BY: Burton Neil, Esquire

Identification No. 11348

1060 Andrew Drive, Suite 170

West Chester, PA 19380

610-696-2120

ATTORNEY FOR: Plaintiff

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WORLDWIDE ASSET PURCHASING LLC

: IN THE COURT OF COMMON PLEAS

Plaintiff

: CLEARFIELD COUNTY, PENNSYLVANIA

VS.

: NO. 05-1112-CD

Lori L. Bortot

Defendant

: CIVIL ACTION - LAW

**RULE OF CIVIL PROCEDURE NO. 236 (REVISED)**

Notice is given that a JUDGMENT in the above captioned matter has been entered against you on

January 26, 2006.

Prothonotary

By:

  
Deputy

If you have any questions concerning the above, please contact:

Burton Neil, Esquire  
Attorney for Party Filing  
1060 Andrew Drive, Suite 170  
West Chester, PA 19380  
Phone: 610-696-2120

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