

05-1127-CD

Asset Acquisitions vs. Hugh Gallagher
2005-1127-CD

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

ASSET ACQUISITIONS GROUP, LLC

Plaintiff

No. 05-1127-CD

vs.

COMPLAINT IN CIVIL ACTION

HUGH J. GALLAGHER

Defendant

FILED ON BEHALF OF
Plaintiff

COUNSEL OF RECORD OF
THIS PARTY:

William T. Molczan, Esquire
PA I.D. #47437
WELTMAN, WEINBERG & REIS CO., L.P.A.
2718 Koppers Building
436 Seventh Avenue
Pittsburgh, PA 15219
(412) 434-7955

WWR#04328648

FILED 1CC Atty
M 7/14/2005 Molczan
AUG 03 2005 Atty pd.
William A. Shaw
Prothonotary Clerk of Courts
85.00

IN THE COURT OF COMMON PLEAS CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

ASSET ACQUISITIONS GROUP, LLC

Plaintiff

vs.

Civil Action No.

HUGH J. GALLAGHER

Defendant

COMPLAINT IN CIVIL ACTION AND NOTICE TO DEFEND

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 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 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.

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

COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
230 EAST MARKET STREET, SUITE 228
CLEARFIELD, PA 16830
814-765-2641 EXT 1300-1301

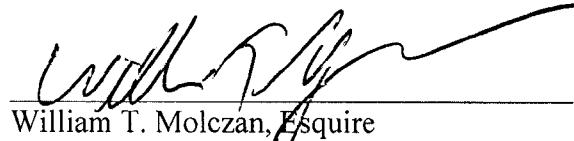
COMPLAINT

1. Plaintiff is a corporation with offices in 6851 Jericho Turnpike #190, Syosset, NY 11791.
2. Defendant is an adult individual residing at 1068 Dillon Road, Coalport, PA 16627.
3. Defendant applied for and received a credit card issued by Plaintiff's assignor bearing the account number 5440450054852367.
4. Defendant made use of said credit card and has currently a balance due and owing to Plaintiff, as of August 1, 2005, in the amount of \$2,730.85.
5. Defendant is in default of the terms of the cardholder Agreement having not made monthly payments to Plaintiff thereby rendering the entire balance immediately due and payable.
6. Although repeatedly requested to do so by Plaintiff, Defendant has willfully failed and/or refused to pay.

WHEREFORE, Plaintiff demands Judgment in its favor and against Defendant, Hugh J. Gallagher individually, in the amount of \$2,730.85 additional interest at the legal interest rate of 6% per annum from the date of judgment plus costs.

THIS IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION OBTAINED
SHALL BE USED FOR THAT PURPOSE.

WELTMAN, WEINBERG & REIS, CO., L.P.A.



William T. Molczan, Esquire

PA I.D. #47437

WELTMAN, WEINBERG & REIS CO., L.P.A.

2718 Koppers Building

436 Seventh Avenue

Pittsburgh, PA 15219

(412) 434-7955

WWR#:04328648

VERIFICATION

The undersigned does hereby verify subject to the penalties of 18 P.A.C.S. §4904 relating to unsworn falsifications to authorities, that he/she is Dawn Felicciardi
Agent of Asset Acquisitions Group, LLC, plaintiff herein, that
(Title) (Name)
(Company)

he/she is duly authorized to make this Verification, and that the facts set forth in the foregoing Complaint in Civil Action are true and correct to the best of his/her knowledge, information and belief.


Dawn Felicciardi
(Signature)

WWR# 04328648

IN THE COURT OF COMMON PLEAS OF CLEAFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

ASSET ACQUISITIONS GROUP, LLC

Plaintiff No. 05-1127-CD

vs.

HUGH J GALLAGHER

**STIPULATION OF THE PARTIES FOR
PAYMENT AND FOR THE ENTRY OF
JUDGMENT BY CONSENT**

Defendant FILED ON BEHALF OF
Plaintiff

COUNSEL OF RECORD OF
THIS PARTY:

James C. Warmbrodt, Esquire
Pa. I.D. No. 42524
Weltman, Weinberg & Reis, Co, LLC
2718 Koppers Building
436 7th Avenue
Pittsburgh, PA 15219

WWR#04328648

FILED

SEP 16 2005
m/3:20/
William A. Shaw
Prothonotary
1 CERT w/NOTICE TO DEF
1 CERT w/STATEMENT TO
R+F

IN THE COURT OF COMMON PLEAS CLEAFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

ASSET ACQUISITIONS GROUP, LLC

Plaintiff

vs.

Civil Action No. 05-1127-CD

HUGH J GALLAGHER

Defendant

**STIPULATION OF THE PARTIES FOR PAYMENT
AND FOR THE ENTRY OF JUDGMENT BY CONSENT**

TO THE PROTHONOTARY:

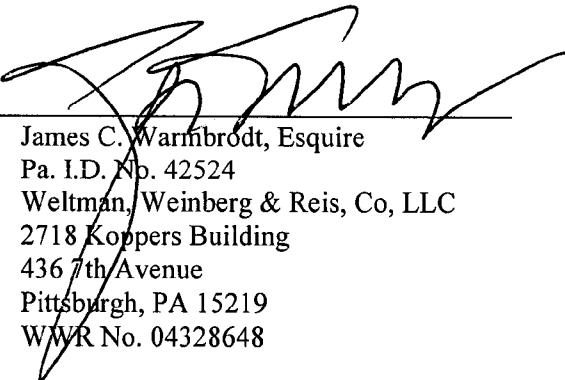
Kindly enter Judgment in favor of Plaintiff and against the Defendant, Hugh J. Gallagher, above-named, in the amount of \$2,730.85 pursuant to the Stipulation of the Parties for Payment and for the Entry of Judgment by Consent, as follows:

1. Defendant admits indebtedness to Plaintiff in the amount of \$2,730.85 with continuing interest thereon at a rate of 6.0% per annum plus costs from date of judgment.
2. To secure the repayment of said indebtedness, Defendant agrees that Judgment by Consent will be entered in favor of the Plaintiff and against the Defendant, Hugh J. Gallagher, in the amount of \$2,730.85 plus continuing interest thereon at the rate of 6.0% per annum from date of judgment and costs.
3. Plaintiff agrees not to execute on its Judgment so long as Defendant causes to be delivered to Plaintiff the following payments in full by 12:00 NOON on the following dates:
 - (a) \$500.00 due by September 10, 2005;
 - (b) \$500.00 due on the 10th day of each consecutive month thereafter until the Judgment amount plus accrued interest and costs are paid in full.

4. All payments are to be made payable to the order of "Asset Acquisitions Group, LLC"
5. All payments due under this agreement are to be received at the offices of Weltman, Weinberg & Reis, Co., L.P.A., 2718 Koppers Building, 436 Seventh Avenue, Pittsburgh, PA 15219.
6. In the event of default, each payment received shall be first attributed to costs, interest and then to principal.
7. Time is of the essence of this agreement and should the Defendant fail to have in the hands of Plaintiff or Plaintiff's counsel any payment in full within five (5) calendar days of the stated due date, then Plaintiff shall be immediately free to issue Execution as well as pursue all other remedies, in law or in equity, to collect the full balance of the Judgment entered hereunder plus appropriate additional interest and costs.
8. No act or omission of the Plaintiff, nor of anyone alleged to be acting on its behalf, shall constitute a waiver, estoppel, or any other excuse for non-performance of any duty undertaken by the Defendant in this Stipulation which the parties agree is final and complete.

9. Intending to be legally bound, the parties set their hands and seals this 24 day of Sept,
2005.

WELTMAN, WEINBERG & REIS CO., L.P.A.

By: 

James C. Warmbrodt, Esquire
Pa. I.D. No. 42524
Weltman, Weinberg & Reis, Co, LLC
2718 Koppers Building
436 7th Avenue
Pittsburgh, PA 15219
WWR No. 04328648

By: 
Defendant, Hugh J. Gallagher

IN THE COURT OF COMMON PLEAS OF CLEAFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

ASSET ACQUISITIONS GROUP, LLC

Plaintiff

vs.

Civil Action No. 05-1127-CD

HUGH J GALLAGHER

Defendant

NOTICE OF JUDGMENT OR ORDER

TO: () Plaintiff
 (xx) Defendant
 () Garnishee

You are hereby notified that the following
Order or Judgment was entered against you
on Sept. 16, 2005

(xx) Assumpsit Judgment in the amount
of \$2,730.85 plus costs.

() Trespass Judgment in the amount
of \$_____ plus costs.

() If not satisfied within sixty (60)
days, your motor vehicle operator's license and/or registration will be
suspended by the Department of Transportation, Bureau of Traffic
Safety, Harrisburg, PA.

(xx) Entry of Judgment of
 () Court Order
 () Non-Pros
 () Confession
 () Default
 () Verdict
 () Arbitration
 () Award
 (XX) By Consent

Prothonotary

Hugh J Gallaher
1068 Dillon Rd
Coalport, Pa 16627

By: 
PROTHONOTARY (OR DEPUTY)

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

Asset Acquisitions Group, LLC
Plaintiff(s)

No.: 2005-01127-CD

Real Debt: \$2,730.85

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Hugh J. Gallagher
Defendant(s)

Entry: \$20.00

Instrument: Consent Judgment

Date of Entry: September 16, 2005

Expires: September 16, 2010

Certified from the record this September 16, 2005

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

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100707
NO: 05-1127-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: ASSET ACQUISITIONS GROUP, LLC
vs.
DEFENDANT: HUGH J. GALLAGHER

SHERIFF RETURN

NOW, August 12, 2005 AT 11:11 AM SERVED THE WITHIN COMPLAINT ON HUGH J. GALLAGHER DEFENDANT AT 1068 DILLON ROAD, COALPORT, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO JACKIE GALLAGHER, WIFE A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DAVIS / MORGILLO

FILED
01/20/05
DEC 19 2005
WM

William A. Shaw
Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	WELTMAN	8218410	10.00
SHERIFF HAWKINS	WELTMAN	8218409	63.36

Sworn to Before Me This

So Answers,

____ Day of _____ 2005

Chester A. Hawkins
by Maury Hayes
Chester A. Hawkins
Sheriff