

05-1694-CD/  
Worldwide Asset vs Mary Carson

Worldwide Asset Purchas. vs Mary Carson  
2005-1694-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** 1cc shff  
m 13:45/BA  
OCT 31 2005  
Any pd. 85.00  
William A. Shaw  
Prothonotary/Clerk of Courts

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

Plaintiff  
v.

: IN THE COURT OF COMMON PLEAS

: CLEARFIELD COUNTY, PENNSYLVANIA

: NO. 05-1694-CD

MARY CARSON  
1372 Dutchtown Road, Madera PA 16661  
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. Meholick  
Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
Telephone No. 814-765-2641 Ext. 5982

62369



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1060 Andrew Drive, Suite 170  
West Chester, PA 19380  
(610) 696-2120  
Attorney for Plaintiff

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

Plaintiff  
v.

: IN THE COURT OF COMMON PLEAS

: CLEARFIELD COUNTY, PENNSYLVANIA

: NO.

MARY CARSON  
1372 Dutchtown Road, Madera PA 16661  
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.

2. The defendant is Mary Carson, who resides at 1372 Dutchtown Road, Madera, Clearfield County, Pennsylvania.

3. At the defendant's request, Direct Merchants Credit furnished consumer credit to defendant bearing account number 5458004685064048 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 \$4,476.51.

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 Credit 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 \$4,476.51, the defendant failed and refused to pay all or any part thereof.

Wherefore, plaintiff demands judgment against the defendant in the sum of \$4,476.51 and the costs of this action.

BURTON NEIL & ASSOCIATES, P.C.

By: \_\_\_\_\_

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 WORLDWIDE ASSET**

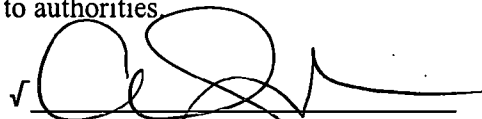
PURCHASING,LLC, the within Plaintiff, and makes this statement on its behalf as to the truthfulness of the facts set forth in the foregoing Complaint subject to the penalties of 18 Pa.

C.S. Section 4904, relating to unsworn falsification to authorities.

Date:

9/13/05

✓

  
Name

Mary Carson  
5458004685064048

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100968  
NO: 05-1694-CD  
SERVICE # 1 OF 1  
COMPLAINT

PLAINTIFF: WORLDWIDE ASSET PURCHASING, LLC  
vs.  
DEFENDANT: MARY CARSON

SHERIFF RETURN

NOW, November 17, 2005 AT 1:54 PM SERVED THE WITHIN COMPLAINT ON MARY CARSON DEFENDANT AT 1372 DUTCHTOWN ROAD, MADERA, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO MARY CARSON, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DAVIS / MORGILLO

FILED  
01/31/06  
FEB 15 2006  
UM

William A. Shaw  
Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	NEIL	15992	10.00
SHERIFF HAWKINS	NEIL	15991	38.37

Sworn to Before Me This

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

So Answers,

*Chester A. Hawkins*  
*Liz Marley Hawk*

Chester A. Hawkins  
Sheriff

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

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

VS.

: NO. 05-1694-CD

MARY CARSON  
1372 Dutchtown Road  
Madera PA 16661

Defendant

: CIVIL ACTION - LAW

**FILED** *Atty pd 20.00*  
*m 12:33/61*  
**MAR 13 2006** *notice to Def.*

**Praeipce for Default Judgment**

William A. Shaw *Statement*  
Prothonotary/Clerk of Courts *to Pmt*

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:	\$4,476.51
TOTAL	\$4,476.51

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**

*William A. Shaw*  
\_\_\_\_\_  
Pro Prothonotary

BURTON NEIL & ASSOCIATES, P.C.

BY: *Burton Neil*

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

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

62369



WORLDWIDE ASSET PURCHASING, LLC

: IN THE COURT OF COMMON PLEAS

Plaintiff

: CLEARFIELD COUNTY, PENNSYLVANIA

vs.

: NO. 05-1694-CD

MARY CARSON

Defendant

: CIVIL ACTION - LAW

**Notice of Intention to File Praecipe for Default Judgment**

TO: Mary Carson  
1372 Dutchtown Road  
Madera PA 16661

**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: February 23, 2006

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.





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

COPY

WORLDWIDE ASSET PURCHASING, LLC  
Plaintiff

: IN THE COURT OF COMMON PLEAS  
: CLEARFIELD COUNTY, PENNSYLVANIA  
: NO. 05-1694-CD  
: CIVIL ACTION - LAW

VS.

MARY CARSON

Defendant

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

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

March 13, 2006.

Prothonotary

By: William L. Shanon

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

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

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

Worldwide Asset Purchasing, LLC  
Plaintiff(s)

No.: 2005-01694-CD

Real Debt: \$4,476.51

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Mary Carson  
Defendant(s)

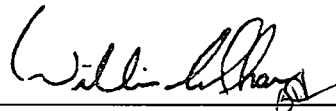
Entry: \$20.00

Instrument: Default Judgment

Date of Entry: March 13, 2006

Expires: March 13, 2011

Certified from the record this 13th day of March, 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