

06-1070-CD

LVNV Fundime et al vs Mary R. Brown

2006-1070-CD

LVNV Fundime et al vs Mary R. Brown

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

LVNV FUNDING, LLC
ASSIGNEE OF SHERMAN ACQUISITION
ASSIGNEE OF BANK OF AMERICA
C/O WOLPOFF & ABRAMSON, L.L.P.
4660 TRINDLE ROAD, 3rd FLOOR
CAMP HILL, PA 17011

Plaintiff

No. *AO-1070-CD*

Type of Case: Contract

Type of Pleading:

VS.

MARY R BROWN
PO BOX 296
DU BOIS PA 15801

Filed on Behalf of: Plaintiff

Defendant(s)

Date: 6/26/06

Amy Doyle
Amy F. Doyle #87062 / Daniel F. Wolfson #20617
Philip C. Watholic #86341 / Andrew C. Spears #87737
David R. Galloway #87326 / Tonilyn M. Chippie #87852
Sarah E. Ehasz #86469 / Robert N. Polas, Jr. #201259
Bruce H. Cherkis #18837 / Ronald S. Canter #94000
Ronald M. Abramson #94266
WOLPOFF & ABRAMSON, L.L.P.
Attorneys in the Practice of Debt Collection
4660 Trindle Road, 3rd Floor
Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

July 2, 2008 Document
Reinstated Reissued to Sheriff/Attorney
for service

William A. Shaw
Deputy Prothonotary

GK

FILED *ICC Shff*
7/11/08 *ICC Atty*
JUL 06 2008 *Atty pd. 85.00*
William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LVNV FUNDING, LLC	:No.
ASSIGNEE OF SHERMAN ACQUISITION	:
ASSIGNEE OF BANK OF AMERICA	:
Plaintiff	:
VS	CIVIL ACTION - LAW
MARY R BROWN	:
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 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 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.

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.

Clearfield County Courthouse
David S. Meholic, Court Administrator 230 East Market Street
Clearfield, PA 16830-
814-765-2641

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LVNV FUNDING, LLC
ASSIGNEE OF SHERMAN ACQUISITION
ASSIGNEE OF BANK OF AMERICA
Plaintiff

:No.

VS

:CIVIL ACTION - LAW

MARY R BROWN
Defendant(s)

NOTICIA

USTED HA SIDO DEMANDADO/A EN LA CORTE. Si usted desea defender conta la demanda puestas en las siguientes paginas, usted tienen que tomar acción dentro veinte (20) dias después que esta Demanda y Aviso es servido, con entrando por escrito una apariencia personalmente o por un abogado y archivando por escrito con la Corte sus defensas o objeciones a las demandas puestas en esta contra usted. Usted es advertido que si falla de hacerlo el caso puede proceder sin usted y un juzgamiento puede ser entrado conta usted por la Corte sin mas aviso por cualquier dinero reclamado en la Demanda o por cualquier otro reclamo o alivio solicitado por Demandante. Usted puede perder dinero o propiedad o otros derechos importante para usted.

USTED DEBE LLEVAR ESTE PAPEL A SU ABOGADO ENSEGUIDA. SI USTED NO TIENE UN ABOGADO, VAYA O LLAME POR TELEFONO LA OFICINA FIJADA AQUI ABAJO. ESTA OFICINA PUEDE PROVEERE CON INFORMACION DE COMO CONSEGUIR UN ABOGADO.

SI USTED NO PUEDE PAGARLE A UN ABOGADO, ESTA OFICINA PUEDE PROVEERE INFORMACION ACERCA AGENCIAS. QUE PUEDAN OFRECER SERVICIOS LEGAL A PERSONAS ELIGIBLE AQ UN HONORARIO REDUCIDO O GRATIS.

Clearfield County Courthouse
David S. Meholick, Court Administrator 230 East Market Street
Clearfield, PA 16830-
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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LVNV FUNDING, LLC
ASSIGNEE OF SHERMAN ACQUISITION
ASSIGNEE OF BANK OF AMERICA

Plaintiff

:No.

VS

:CIVIL ACTION - LAW

MARY R BROWN

Defendant(s)

:

:

:

COMPLAINT

AND NOW, comes the Plaintiff, by and through its attorneys and the law firm of Wolpoff & Abramson, LLP, and files this Complaint and in support avers as follows:

1. Plaintiff is LVNV FUNDING, LLC ASSIGNEE OF SHERMAN ACQUISITION
ASSIGNEE OF BANK OF AMERICA , 15 South Main Street Greenville, SC 29601.
2. Defendant, MARY R BROWN, is an adult individual with a last known address of Po Box 296 Du Bois, Clearfield County, PA 15801.
3. It is averred that Defendant was issued an open end credit account (hereinafter "Account").
4. At all relevant times material hereto, Defendant has been regular users of said Account for the purchase of products, goods and/or for obtaining services.
5. Defendant was provided with copies of the Statement of Accounts showing all debits and credits for transactions on the aforementioned credit card account to which there was no bona fide objection by Defendant. A true and correct copy of the Statement of Account is attached hereto, incorporated herein and marked as Exhibit "A."
6. Defendant did not object to the above-mentioned statement submitted by Plaintiff and/or its assignors to Defendant.

7. 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 and/or any authorized users is the sum of \$9,199.46.

8. Interest has accrued from the charge off date at a rate of 18 %.

9. As of the date of the filing of this Complaint, the amount of interest which has accrued is the sum of \$2,888.48.

10. As of the filing of this Complaint, Plaintiff has incurred reasonable attorney's fees from the law office of Wolpoff & Abramson, LLP in the collection of the amounts due from Defendant incident to the within action based upon 20% of the principal amount due and owing, and Plaintiff shall continue to incur such attorney's fees through the conclusion of the proceedings.

11. The amount of attorney's fees which has accrued is the sum of \$1,839.89.

12. Despite reasonable and repeated demands for payment, Defendant has refused and continues to refuse to pay all sums due and owing on the aforementioned account balance, all to the damage and detriment of the Plaintiff.

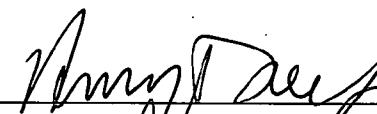
13. Plaintiff performed any and all conditions precedent to the bringing of this action.

14. The amount in controversy is within the jurisdictional amount requiring compulsory arbitration.

WHEREFORE, Plaintiff respectfully requests this Honorable Court enter Judgment in favor of the Plaintiff and against Defendant in the amount of \$9,199.46, plus interest in the amount of \$2,888.48, plus attorney's fees in the amount of \$1,839.89, plus costs of this action and any other relief as this Court deems just and reasonable.

Respectfully Submitted,

Date: 6/26/06


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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WOLPOFF & ABRAMSON, L.L.P.
Attorneys in the Practice of Debt Collection
4660 Trindle Road, 3rd Floor
Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

VERIFICATION

The undersigned hereby states that they are 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, they are authorized to take this verification on behalf of said Plaintiff in the within action and verifies that the statements made in the foregoing Pleading are true and correct to the best of their 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: 6/26/06



Amy F. Doyle #87062 / Daniel F. Wolfson #20617
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4660 Trindle Road, 3rd Floor
Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

Exhibit "A"

ACCT#4427100021918516 BAL 9199.46 C/O DT 04/18/05 LPYMT DT 09/10/04

NAME MARY R BROWN

ADDR PO BOX 296

7

CITY ST ZIP DU BOIS PA 15801

HMPH 8143714946 WKPH 8143711100 SSN XXX-XX-4268

*SFG-ACCTID *SFG-PORTF-ID *SFG-BATCH-ID *SFG-POOL *SFG-CARD-TYPE

120013063 5120 68532 EAST

*SFG-MERCHANT *SFG-ACCT-NO

BANK OF AMERICA 4427100021918516

*SFG-SSN *SFG-DOB *SFG-PREFIX *SFG-F-NAME

XXX-XX-4268 1/1/1957 MARY R

*SFG-L-NAME *SFG-SUFFIX

BROWN

*SFG-ADDR1

PO BOX 296

*SFG-ADDR2 *SFG-CITY *SFG-ST

7 DU BOIS PA

*SFG-ZIP *SFG-HOME-PH *SFG-WORK-PH *SFG-WIRELESS-PH

15801 8143714946 8143711100

*SFG-OTHER-PH *SFG-POE

*SFG-POE-ADDR *SFG-CO-DEB-SSN *SFG-CO-DEB-DOB

XXX-XX-0000

*SFG-CO-DEB-PREFIX *SFG-CO-DEB-FRST-NAME

*SFG-CO-DEB-LST-NAME *SFG-CO-DEB-SUFFIX

*SFG-CO-DEB-ADDR

*SFG-CO-DEB-ADDR2 *SFG-CO-DEB-CITY

*SFG-CO-DEB-ST *SFG-CO-DEB-ZIP *SFG-CO-DEB-HM-PH *SFG-CO-DEB-WK-PH

*SFG-CO-DEB-WIRELESS-PH *SFG-CO-DEB-OTH-PH

*SFG-CO-DEB-POE

*SFG-CO-DEB-POE-ADDR1

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 1 of 1 Services

Sheriff Docket # 101689

LVNV FUNDING, LLC

Case # 06-1070-CD

VS.

MARY R. BROWN

TYPE OF SERVICE COMPLAINT

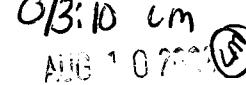
SHERIFF RETURNS

NOW August 10, 2006 RETURNED THE WITHIN COMPLAINT "NOT SERVED, TIME EXPIRED" AS TO MARY R. BROWN, DEFENDANT. NEVER RECV'D. PHYSICAL ADDRESS FOR DEFENDANT

SERVED BY: /

Return Costs

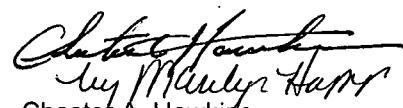
PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	WOLPOFF	19997	10.00
SHERIFF HAWKINS	WOLPOFF	19997	14.39

FILED
03:10 am
Aug 10 2006 

Sworn to Before me This

____ Day of _____ 2006

So Answers,


Chester A. Hawkins
Sheriff

**COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA**

LVNV FUNDING, LLC
ASSIGNEE OF SHERMAN ACQUISITION
ASSIGNEE OF BANK OF AMERICA
C/O WOLPOFF & ABRAMSON, L.L.P.
4660 TRINDLE ROAD, 3rd FLOOR
CAMP HILL, PA 17011

Plaintiff

No. 06-1070-CD

Type of Case: Contract

VS.

MARY R BROWN
PO BOX 296
DU BOIS PA 15801

Type of Pleading:

Filed on Behalf of: Plaintiff

Defendant(s)

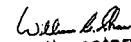
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4660 Trindle Road, 3rd Floor
Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

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

JUL 06 2006

Attest.


William B. Schaeffer
Prothonotary/
Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LVNV FUNDING, LLC	:No.
ASSIGNEE OF SHERMAN ACQUISITION	:
ASSIGNEE OF BANK OF AMERICA	:
Plaintiff	:
VS	CIVIL ACTION - LAW
MARY R BROWN	:
Defendant(s)	:

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LVNV FUNDING, LLC	:No.
ASSIGNEE OF SHERMAN ACQUISITION	:
ASSIGNEE OF BANK OF AMERICA	:
Plaintiff	:
VS	:CIVIL ACTION - LAW
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Defendant(s)	:
	:
	:
	:

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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LVNV FUNDING, LLC	:	
ASSIGNEE OF SHERMAN ACQUISITION	:	No.
ASSIGNEE OF BANK OF AMERICA	:	
Plaintiff	:	
VS	:	
MARY R BROWN	:	CIVIL ACTION - LAW
Defendant(s)	:	
	:	

COMPLAINT

AND NOW, comes the Plaintiff, by and through its attorneys and the law firm of Wolpoff & Abramson, LLP, and files this Complaint and in support avers as follows:

1. Plaintiff is LVNV FUNDING, LLC ASSIGNEE OF SHERMAN ACQUISITION ASSIGNEE OF BANK OF AMERICA , 15 South Main Street Greenville, SC 29601.
2. Defendant, MARY R BROWN, is an adult individual with a last known address of Po Box 296 Du Bois, Clearfield County, PA 15801.
3. It is averred that Defendant was issued an open end credit account (hereinafter "Account").
4. At all relevant times material hereto, Defendant has been regular users of said Account for the purchase of products, goods and/or for obtaining services.
5. Defendant was provided with copies of the Statement of Accounts showing all debits and credits for transactions on the aforementioned credit card account to which there was no bona fide objection by Defendant. A true and correct copy of the Statement of Account is attached hereto, incorporated herein and marked as Exhibit "A."
6. Defendant did not object to the above-mentioned statement submitted by Plaintiff and/or its assignors to Defendant.

7. 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 and/or any authorized users is the sum of \$9,199.46.

8. Interest has accrued from the charge off date at a rate of 18 %.

9. As of the date of the filing of this Complaint, the amount of interest which has accrued is the sum of \$2,888.48.

10. As of the filing of this Complaint, Plaintiff has incurred reasonable attorney's fees from the law office of Wolpoff & Abramson, LLP in the collection of the amounts due from Defendant incident to the within action based upon 20% of the principal amount due and owing, and Plaintiff shall continue to incur such attorney's fees through the conclusion of the proceedings.

11. The amount of attorney's fees which has accrued is the sum of \$1,839.89.

12. Despite reasonable and repeated demands for payment, Defendant has refused and continues to refuse to pay all sums due and owing on the aforementioned account balance, all to the damage and detriment of the Plaintiff.

13. Plaintiff performed any and all conditions precedent to the bringing of this action.

14. The amount in controversy is within the jurisdictional amount requiring compulsory arbitration.

WHEREFORE, Plaintiff respectfully requests this Honorable Court enter Judgment in favor of the Plaintiff and against Defendant in the amount of \$9,199.46, plus interest in the amount of \$2,888.48, plus attorney's fees in the amount of \$1,839.89, plus costs of this action and any other relief as this Court deems just and reasonable.

Respectfully Submitted,

Date: 6/26/06

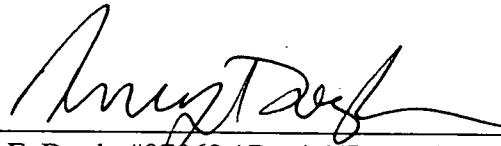

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WOLPOFF & ABRAMSON, L.L.P.
Attorneys in the Practice of Debt Collection
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Telephone: (717) 303-6700
Counsel for Plaintiff

VERIFICATION

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4660 Trindle Road, 3rd Floor
Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

Exhibit "A"

ACCT#4427100021918516 BAL 9199.46 C/O DT 04/18/05 LPYMT DT 09/10/04

NAME MARY R BROWN

ADDR PO BOX 296

7

CITY ST ZIP DU BOIS PA 15801

HMPH 8143714946 WKPH 8143711100 SSN XXX-XX-4268

*SFG-ACCTID *SFG-PORTF-ID*SFG-BATCH-ID*SFG-POOL *SFG-CARD-TYPE
120013063 5120 68532 EAST

*SFG-MERCHANT *SFG-ACCT-NO

BANK OF AMERICA 4427100021918516

*SFG-SSN *SFG-DOB *SFG-PREFIX*SFG-F-NAME
XXX-XX-4268 1/1/1957 MARY R

*SFG-L-NAME *SFG-SUFFIX

BROWN

*SFG-ADDR1

PO BOX 296

*SFG-ADDR2 *SFG-CITY *SFG-ST

7 DU BOIS PA

*SFG-ZIP *SFG-HOME-PH *SFG-WORK-PH *SFG-WIRELESS-PH
15801 8143714946 8143711100

*SFG-OTHER-PH *SFG-POE

*SFG-POE-ADDR *SFG-CO-DEB-SSN*SFG-CO-DEB-DOB
XXX-XX-0000

*SFG-CO-DEB-PREFIX*SFG-CO-DEB-FRST-NAME

*SFG-CO-DEB-LST-NAME *SFG-CO-DEB-SUFFIX

*SFG-CO-DEB-ADDR

*SFG-CO-DEB-ADDR2 *SFG-CO-DEB-CITY

*SFG-CO-DEB-ST*SFG-CO-DEB-ZIP*SFG-CO-DEB-HM-PH *SFG-CO-DEB-WK-PH

*SFG-CO-DEB-WIRELESS-PH*SFG-CO-DEB-OTH-PH

*SFG-CO-DEB-POE

*SFG-CO-DEB-POE-ADDR1

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LVNV FUNDING, LLC
ASSIGNEE OF SHERMAN ACQUISITION
ASSIGNEE OF BANK OF AMERICA
Plaintiff

No. 06-1070-CD

VS

CIVIL ACTION - LAW

MARY R BROWN
Defendant(s)

PRAECIPE TO REINSTATE

To the Prothonotary:

Kindly reinstate the complaint in the above-referenced matter.

Respectfully Submitted,

Date: 6/27/08


Amy F. Doyle #87062 / Philip C. Warholic #86341 /
David R. Galloway #87326 / Sarah E. Ehasz #86469 /
Robert N. Polas, Jr. #201259
Wolpoff & Abramson, L.L.P.
Attorneys in the Practice of Debt Collection
4660 Trindle Road, Suite 300
Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

FILED Atty pd. \$7.00
m/11/2008
JUL 02 2008
1CC&1 Compl. Reinstated to Sheriff
William A. Shaw
Prothonotary/Clerk of Courts
1CC&1 Compl. Reinstated to Atty
④

**COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA**

LVNV FUNDING, LLC
ASSIGNEE OF SHERMAN ACQUISITION
ASSIGNEE OF BANK OF AMERICA
C/O WOLPOFF & ABRAMSON, L.L.P.
4660 TRINDLE ROAD, 3rd FLOOR
CAMP HILL, PA 17011

Plaintiff

No. 06-1070-CD

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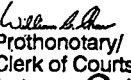
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Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

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

JUL 06 2006

Attest.


Prothonotary/
Clerk of Courts

159 542 912

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LVNV FUNDING, LLC	:No.
ASSIGNEE OF SHERMAN ACQUISITION	:
ASSIGNEE OF BANK OF AMERICA	:
Plaintiff	:
VS	:CIVIL ACTION - LAW
MARY R BROWN	:
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 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 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.

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.

Clearfield County Courthouse
David S. Meholic, Court Administrator 230 East Market Street
Clearfield, PA 16830-
814-765-2641

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LVNV FUNDING, LLC	:No.
ASSIGNEE OF SHERMAN ACQUISITION	:
ASSIGNEE OF BANK OF AMERICA	:
Plaintiff	:
VS	:CIVIL ACTION - LAW
MARY R BROWN	:
Defendant(s)	:

NOTICIA

USTED HA SIDO DEMANDADO/A EN LA CORTE. Si usted desea defender conta la demanda puestas en las siguientes paginas, usted tienen que tomar acción dentro veinte (20) dias después que esta Demanda y Aviso es servido, con entrando por escrito una apariencia personalmente o por un abogado y archivando por escrito con la Corte sus defensas o objeciones a las demandas puestas en esta contra usted. Usted es advertido que si falla de hacerlo el caso puede proceder sin usted y un juzgamiento puede ser entrado conta usted por la Corte sin mas aviso por cualquier dinero reclamado en la Demanda o por cualquier otro reclamo o alivio solicitado por Demandante. Usted puede perder dinero o propiedad o otros derechos importante para usted.

USTED DEBE LLEVAR ESTE PAPEL A SU ABOGADO ENSEGUITA. SI USTED NO TIENE UN ABOGADO, VAYA O LLAME POR TELEFONO LA OFICINA FIJADA AQUI ABAJO. ESTA OFICINA PUEDE PROVEERE CON INFORMACION DE COMO CONSEGUIR UN ABOGADO.

SI USTED NO PUEDE PAGARLE A UN ABOGADO, ESTA OFICINA PUEDE PROVEERE INFORMACION ACERCA AGENCIAS. QUE PUEDAN OFRECER SERVICIOS LEGAL A PERSONAS ELIGIBLE AQ UN HONORARIO REDUCIDO O GRATIS.

Clearfield County Courthouse
David S. Meholick, Court Administrator 230 East Market Street
Clearfield, PA 16830-
814-765-2641

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LVNV FUNDING, LLC	:	
ASSIGNEE OF SHERMAN ACQUISITION	:	No.
ASSIGNEE OF BANK OF AMERICA	:	
Plaintiff	:	
VS	:	
MARY R BROWN	:	CIVIL ACTION - LAW
Defendant(s)	:	

COMPLAINT

AND NOW, comes the Plaintiff, by and through its attorneys and the law firm of Wolpoff & Abramson, LLP, and files this Complaint and in support avers as follows:

1. Plaintiff is LVNV FUNDING, LLC ASSIGNEE OF SHERMAN ACQUISITION ASSIGNEE OF BANK OF AMERICA , 15 South Main Street Greenville, SC 29601.
2. Defendant, MARY R BROWN, is an adult individual with a last known address of Po Box 296 Du Bois, Clearfield County, PA 15801.
3. It is averred that Defendant was issued an open end credit account (hereinafter "Account").
4. At all relevant times material hereto, Defendant has been regular users of said Account for the purchase of products, goods and/or for obtaining services.
5. Defendant was provided with copies of the Statement of Accounts showing all debits and credits for transactions on the aforementioned credit card account to which there was no bona fide objection by Defendant. A true and correct copy of the Statement of Account is attached hereto, incorporated herein and marked as Exhibit "A."
6. Defendant did not object to the above-mentioned statement submitted by Plaintiff and/or its assignors to Defendant.

7. 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 and/or any authorized users is the sum of \$9,199.46.

8. Interest has accrued from the charge off date at a rate of 18 %.

9. As of the date of the filing of this Complaint, the amount of interest which has accrued is the sum of \$2,888.48.

10. As of the filing of this Complaint, Plaintiff has incurred reasonable attorney's fees from the law office of Wolpoff & Abramson, LLP in the collection of the amounts due from Defendant incident to the within action based upon 20% of the principal amount due and owing, and Plaintiff shall continue to incur such attorney's fees through the conclusion of the proceedings.

11. The amount of attorney's fees which has accrued is the sum of \$1,839.89.

12. Despite reasonable and repeated demands for payment, Defendant has refused and continues to refuse to pay all sums due and owing on the aforementioned account balance, all to the damage and detriment of the Plaintiff.

13. Plaintiff performed any and all conditions precedent to the bringing of this action.

14. The amount in controversy is within the jurisdictional amount requiring compulsory arbitration.

WHEREFORE, Plaintiff respectfully requests this Honorable Court enter Judgment in favor of the Plaintiff and against Defendant in the amount of \$9,199.46, plus interest in the amount of \$2,888.48, plus attorney's fees in the amount of \$1,839.89, plus costs of this action and any other relief as this Court deems just and reasonable.

Respectfully Submitted,

Date: 6/26/06



Amy F. Doyle #87062 / Daniel F. Wolfson #20617
Philip C. Warholic #86341 / Andrew C. Spears #87737
David R. Galloway #87326 / Tonilyn M. Chippie #87852
Sarah E. Ehasz #86469 / Robert N. Polas, Jr. #201259
Bruce H. Cherkis #18837 / Ronald S. Canter #94000
Ronald M. Abramson #94266
WOLPOFF & ABRAMSON, L.L.P.
Attorneys in the Practice of Debt Collection
4660 Trindle Road, 3rd Floor
Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

VERIFICATION

The undersigned hereby states that they are 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, they are authorized to take this verification on behalf of said Plaintiff in the within action and verifies that the statements made in the foregoing Pleading are true and correct to the best of their 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: 6/26/06



Amy F. Doyle #87062 / Daniel F. Wolfson #20617
Philip C. Warholic #86341 / Andrew C. Spears #87737
David R. Galloway #87326 / Tonilyn M. Chippie #87852
Sarah E. Ehasz #86469 / Robert N. Polas, Jr. #201259
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WOLPOFF & ABRAMSON, L.L.P.
Attorneys in the Practice of Debt Collection
4660 Trindle Road, 3rd Floor
Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

Exhibit "A"

ACCT#4427100021918516 BAL 9199.46 C/O DT 04/18/05 LPYMT DT 09/10/04

NAME MARY R BROWN
ADDR PO BOX 296

7

CITY ST ZIP DU BOIS

PA 15801

HMPH 8143714946 WKPH 8143711100 SSN XXX-XX-4268

*SFG-ACCTID *SFG-PORTF-ID*SFG-BATCH-ID*SFG-POOL *SFG-CARD-TYPE
120013063 5120 68532 EAST

*SFG-MERCHANT *SFG-ACCT-NO

BANK OF AMERICA 4427100021918516

*SFG-SSN *SFG-DOB *SFG-PREFIX*SFG-F-NAME

XXX-XX-4268 1/1/1957 MARY R

*SFG-L-NAME *SFG-SUFFIX

BROWN

*SFG-ADDR1

PO BOX 296

*SFG-ADDR2

*SFG-CITY

*SFG-ST

7 DU BOIS PA

*SFG-ZIP *SFG-HOME-PH *SFG-WORK-PH *SFG-WIRELESS-PH

15801 8143714946 8143711100

*SFG-OTHER-PH *SFG-POE

*SFG-POE-ADDR *SFG-CO-DEB-SSN*SFG-CO-DEB-DOB

XXX-XX-0000

*SFG-CO-DEB-PREFIX*SFG-CO-DEB-FRST-NAME

*SFG-CO-DEB-LST-NAME *SFG-CO-DEB-SUFFIX

*SFG-CO-DEB-ADDR

*SFG-CO-DEB-ADDR2 *SFG-CO-DEB-CITY

*SFG-CO-DEB-ST*SFG-CO-DEB-ZIP*SFG-CO-DEB-HM-PH *SFG-CO-DEB-WK-PH

*SFG-CO-DEB-WIRELESS-PH*SFG-CO-DEB-OTH-PH

*SFG-CO-DEB-POE

*SFG-CO-DEB-POE-ADDR1

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 06-1070-CD

LVNV FUNDING, LLC Assignee
vs
MARY R. BROWN

SERVICE # 1 OF 1

COMPLAINT & PRAECIPE

SERVE BY: 08/01/2008

HEARING:

PAGE: 104360

FILED

8/8/2008
AUG 05 2008

DEFENDANT: MARY R. BROWN
ADDRESS: 533 MAPLE AVE.
DUBOIS, PA 15801

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

William A. Shaw
Prothonotary/Clerk of Courts

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT OCCUPIED

ATTEMPTS

7-9-08- 2:15pm - Possibly in Treasure Lake
Def does not live at
above address -
hasnt for 8-years **SHERIFF'S RETURN**

NOW, _____ AT _____ AM / PM SERVED THE WITHIN

COMPLAINT & PRAECIPE ON MARY R. BROWN, DEFENDANT

BY HANDING TO _____ / _____

A TRUE AND ATTESTED COPY OF THE ORIGINAL DOCUMENT AND MADE KNOW TO HIM / HER THE CONTENTS THEREOF.

ADDRESS SERVED _____

NOW _____ AT _____ AM / PM POSTED THE WITHIN

COMPLAINT & PRAECIPE FOR MARY R. BROWN

AT (ADDRESS) _____

NOW 8-5-08 AT 8:20 PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF **NOT FOUND** AS TO MARY R. BROWN

REASON UNABLE TO LOCATE Has not lived at address for 8-Years

SWORN TO BEFORE ME THIS

DAY OF 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

Jerome M. Neivius
Deputy Signature

Jerome M. Neivius
Print Deputy Name

PHONE (814) 765-2641
OFFICE HOURS: 8:30 A.M. TO 4:00 P.M.

SHERIFF CHESTER A. HAWKINS

Thank you for your consideration in this matter.

be able to help you.

When you call, please give your name and the case # noted above (104360) and someone in the Office will

Would you please contact the Sheriff's Office EXTENSION 1360 concerning legal papers we have for you

DEAR MARY R. BROWN

CASE # 104360
CLEARFIELD COUNTY
SHERIFF'S OFFICE

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LVNV FUNDING, LLC
ASSIGNEE OF SHERMAN ACQUISITION
ASSIGNEE OF BANK OF AMERICA
Plaintiff

No. 06-1070-CD

VS

CIVIL ACTION - LAW

MARY R BROWN
Defendant(s)

PRAECIPE TO REINSTATE

To the Prothonotary:

Kindly reinstate the complaint in the above-referenced matter.

Respectfully Submitted,

Date: 6/27/08


Amy F. Doyle #87062 / Philip C. Warholic #86341 /
David R. Galloway #87326 / Sarah E. Ehasz #86469 /
Robert N. Polas, Jr. #201259
Wolpoff & Abramson, L.L.P.
Attorneys in the Practice of Debt Collection
4660 Trindle Road, Suite 300
Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

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

JUL 02 2008

Attest.


William L. Lohman
Prothonotary/
Clerk of Courts

**COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA**

LVNV FUNDING, LLC
ASSIGNEE OF SHERMAN ACQUISITION
ASSIGNEE OF BANK OF AMERICA
C/O WOLPOFF & ABRAMSON, L.L.P.
4660 TRINDLE ROAD, 3rd FLOOR
CAMP HILL, PA 17011

Plaintiff

No. *06-1070-CD*

Type of Case: Contract

VS.

MARY R BROWN
PO BOX 296
DU BOIS PA 15801

Type of Pleading:

Filed on Behalf of: Plaintiff

Defendant(s)

Date: *6/6/06*

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

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

JUL 06 2006

7/2/06 Document
Reinstated/Reissued to Sheriff, Attorney
for service.

Attest.

*Wm. A. Prothonotary/
Clerk of Courts*

Wm. A. Prothonotary

159 542 912

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LVNV FUNDING, LLC	:No.
ASSIGNEE OF SHERMAN ACQUISITION	:
ASSIGNEE OF BANK OF AMERICA	:
Plaintiff	:
VS	:CIVIL ACTION - LAW
MARY R BROWN	:
Defendant(s)	:

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Clearfield County Courthouse
David S. Meholick, Court Administrator 230 East Market Street
Clearfield, PA 16830-
814-765-2641

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LVNV FUNDING, LLC	:No.
ASSIGNEE OF SHERMAN ACQUISITION	:
ASSIGNEE OF BANK OF AMERICA	:
Plaintiff	:
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MARY R BROWN	:
Defendant(s)	:

NOTICIA

USTED HA SIDO DEMANDADO/A EN LA CORTE. Si usted desea defender contra la demanda puestas en las siguientes paginas, usted tienen que tomar acción dentro veinte (20) dias después que esta Demanda y Aviso es servido, con entrando por escrito una apariencia personalmente o por un abogado y archivando por escrito con la Corte sus defensas o objeciones a las demandas puestas en esta contra usted. Usted es advertido que si falla de hacerlo el caso puede proceder sin usted y un juzgamiento puede ser entrado contra usted por la Corte sin mas aviso por cualquier dinero reclamado en la Demanda o por cualquier otro reclamo o alivio solicitado por Demandante. Usted puede perder dinero o propiedad o otros derechos importante para usted.

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Clearfield County Courthouse
David S. Meholick, Court Administrator 230 East Market Street
Clearfield, PA 16830-
814-765-2641

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LVNV FUNDING, LLC	:	
ASSIGNEE OF SHERMAN ACQUISITION	:	No.
ASSIGNEE OF BANK OF AMERICA	:	
Plaintiff	:	
VS	:	
MARY R BROWN	:	CIVIL ACTION - LAW
Defendant(s)	:	
	:	

COMPLAINT

AND NOW, comes the Plaintiff, by and through its attorneys and the law firm of Wolpoff & Abramson, LLP, and files this Complaint and in support avers as follows:

1. Plaintiff is LVNV FUNDING, LLC ASSIGNEE OF SHERMAN ACQUISITION ASSIGNEE OF BANK OF AMERICA , 15 South Main Street Greenville, SC 29601.
2. Defendant, MARY R BROWN, is an adult individual with a last known address of Po Box 296 Du Bois, Clearfield County, PA 15801.
3. It is averred that Defendant was issued an open end credit account (hereinafter "Account").
4. At all relevant times material hereto, Defendant has been regular users of said Account for the purchase of products, goods and/or for obtaining services.
5. Defendant was provided with copies of the Statement of Accounts showing all debits and credits for transactions on the aforementioned credit card account to which there was no bona fide objection by Defendant. A true and correct copy of the Statement of Account is attached hereto, incorporated herein and marked as Exhibit "A."
6. Defendant did not object to the above-mentioned statement submitted by Plaintiff and/or its assignors to Defendant.

7. 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 and/or any authorized users is the sum of \$9,199.46.

8. Interest has accrued from the charge off date at a rate of 18 %.

9. As of the date of the filing of this Complaint, the amount of interest which has accrued is the sum of \$2,888.48.

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11. The amount of attorney's fees which has accrued is the sum of \$1,839.89.

12. Despite reasonable and repeated demands for payment, Defendant has refused and continues to refuse to pay all sums due and owing on the aforementioned account balance, all to the damage and detriment of the Plaintiff.

13. Plaintiff performed any and all conditions precedent to the bringing of this action.

14. The amount in controversy is within the jurisdictional amount requiring compulsory arbitration.

WHEREFORE, Plaintiff respectfully requests this Honorable Court enter Judgment in favor of the Plaintiff and against Defendant in the amount of \$9,199.46, plus interest in the amount of \$2,888.48, plus attorney's fees in the amount of \$1,839.89, plus costs of this action and any other relief as this Court deems just and reasonable.

Respectfully Submitted,

Date: 6/26/06

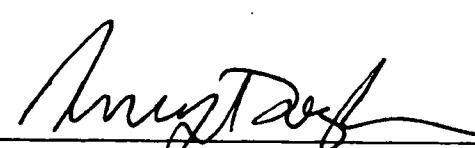

Amy F. Doyle #80062 / Daniel F. Wolfson #20617
Philip C. Warholic #86341 / Andrew C. Spears #87737
David R. Galloway #87326 / Tonilyn M. Chippie #87852
Sarah E. Ehazz #86469 / Robert N. Polas, Jr. #201259
Bruce H. Cherkis #18837 / Ronald S. Canter #94000
Ronald M. Abramson #94266
WOLPOFF & ABRAMSON, L.L.P.
Attorneys in the Practice of Debt Collection
4660 Trindle Road, 3rd Floor
Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

VERIFICATION

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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: 6/26/06



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WOLPOFF & ABRAMSON, L.L.P.
Attorneys in the Practice of Debt Collection
4660 Trindle Road, 3rd Floor
Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

Exhibit "A"

ACCT#4427100021918516 BAL 9199.46 C/O DT 04/18/05 LPYMT DT 09/10/04
NAME MARY R BROWN
ADDR PO BOX 296

7

CITY ST ZIP DU BOIS PA 15801
HMPH 8143714946 WKPH 8143711100 SSN XXX-XX-4268
*SFG-ACCTID *SFG-PORTF-ID*SFG-BATCH-ID*SFG-POOL *SFG-CARD-TYPE
120013063 5120 68532 EAST
*SFG-MERCHANT *SFG-ACCT-NO
BANK OF AMERICA 4427100021918516
*SFG-SSN *SFG-DOB *SFG-PREFIX*SFG-F-NAME
XXX-XX-4268 1/1/1957 MARY R
*SFG-L-NAME *SFG-SUFFIX
BROWN
*SFG-ADDR1
PO BOX 296
*SFG-ADDR2 *SFG-CITY *SFG-ST
7 DU BOIS PA
*SFG-ZIP *SFG-HOME-PH *SFG-WORK-PH *SFG-WIRELESS-PH
15801 8143714946 8143711100
*SFG-OTHER-PH *SFG-POE
*SFG-POE-ADDR *SFG-CO-DEB-SSN*SFG-CO-DEB-DOB
XXX-XX-0000
*SFG-CO-DEB-PREFIX*SFG-CO-DEB-FRST-NAME
*SFG-CO-DEB-LST-NAME *SFG-CO-DEB-SUFFIX
*SFG-CO-DEB-ADDR
*SFG-CO-DEB-ADDR2 *SFG-CO-DEB-CITY
*SFG-CO-DEB-ST*SFG-CO-DEB-ZIP*SFG-CO-DEB-HM-PH *SFG-CO-DEB-WK-PH
*SFG-CO-DEB-WIRELESS-PH*SFG-CO-DEB-OTH-PH
*SFG-CO-DEB-POE
*SFG-CO-DEB-POE-ADDR1

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104360
NO: 06-1070-CD
SERVICES 1
COMPLAINT & PRAECIPE

PLAINTIFF: LVNV FUNDING, LLC Assignee
vs.
DEFENDANT: MARY R. BROWN

S
FILED

DEC 24 2008

William A. Shaw
Prothonotary/Clerk of Courts

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	WOLPOFF	00290891	10.00
SHERIFF HAWKINS	WOLPOFF	00290891	27.23

FILED
O/10.43cm
DEC 24 2008

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

So Answers,

____ Day of _____ 2008

Chester A. Hawkins

Chester A. Hawkins
Sheriff

Notice of Proposed Termination of Court Case

March 2, 2012

RE: 2006-01070-CD

LVNV Funding, LLC
Sherman Acquisition
Bank of America

Vs.

Mary R. Brown

FILED

5 MAR 02 2012

William A. Shaw
Prothonotary/Clerk of Courts

6C

To All Parties and Counsel:

Please be advised that the Court intends to terminate the above captioned case without notice, because the Court records show no activity in the case for a period of at least two years.

You may stop the Court terminating the case by filing a Statement of Intention to Proceed. The Statement of Intention to Proceed must be filed with the **Prothonotary of Clearfield County, PO Box 549, Clearfield, Pennsylvania 16830**. The Statement of Intention to Proceed must be filed on or before May 2, 2012.

If you fail to file the required statement of intention to proceed within the required time period, the case will be terminated.

By the Court,

F. Cortez Bell, III

F. Cortez Bell, III, Esq.
Court Administrator

