

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

PALISADES COLLECTION, L.L.C.
ASSIGNEE OF CHASE MANHATTAN BANK
C/O WOLPOFF & ABRAMSON, L.L.P.
4660 TRINDLE ROAD, 3rd FLOOR
CAMP HILL, PA 17011
Plaintiff

No. 06-1509-CD

Type of Case: Contract

Type of Pleading:

Filed on Behalf of: Plaintiff

VS.

MICHAEL P SPRAGUE
158 N PANCOAST RD
FALLS CREEK PA 15840

Defendant(s)

Date: 9/14/06

MDR 14, 2006 Document
Reinstated/Reissued to Sheriff/Attorney
for service.
[Signature]
Deputy Prothonotary

C
Amy F. Doyle #87062 / Daniel F. Wolfson #20617
Philip C. Warholc #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

FILED 10:00 AM SEP 18 2006 1cc SHff
1cc Atty
William A. Shaw
Prothonotary/Clerk of Courts Atty 85.00

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION, L.L.C.
ASSIGNEE OF CHASE MANHATTAN BANK

Plaintiff

VS

MICHAEL P SPRAGUE
Defendant(s)

:No.

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:CIVIL ACTION - LAW

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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.

Jefferson County
Laurel Legal Services, Inc. 201 Main Street
Brookville, PA 15825-
814-849-3044

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION, L.L.C.
ASSIGNEE OF CHASE MANHATTAN BANK
Plaintiff

VS

MICHAEL P SPRAGUE
Defendant(s)

:No.

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:CIVIL ACTION - LAW

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NOTICIA

USTED HA SIDO DEMANDADO/A EN LA CORTE. Si usted desea defender contra la demanda puesta 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.

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 A UN HONORARIO REDUCIDO O GRATIS.

Jefferson County
Laurel Legal Services, Inc. 201 Main Street
Brookville, PA 15825-
814-849-3044

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION, L.L.C.
ASSIGNEE OF CHASE MANHATTAN BANK
Plaintiff

VS

MICHAEL P SPRAGUE
Defendant(s)

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:No.
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:CIVIL ACTION - LAW
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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 PALISADES COLLECTION, L.L.C. ASSIGNEE OF CHASE MANHATTAN BANK, located at 210 Sylvan Avenue Englewood Cliffs, NJ 07632.
2. Defendant, MICHAEL P SPRAGUE, is an adult individual with a last known address of 158 N Pancoast Rd Falls Creek, Clearfield County, PA 15840.
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 \$10,919.42.

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 \$5,874.94.

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 \$2,183.88.

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 \$10,919.42, plus interest in the amount of \$5,874.94, plus attorney's fees in the amount of \$2,183.88, plus costs of this action and any other relief as this Court deems just and reasonable.

Respectfully Submitted,

Date: 9/14/02




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: 9/14/06



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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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"

PLAINTIFF = 425230
ACCOUNT NUMBER = 4417112566192904
POOL ID = CHASAR
CURRENT BALANCE = 10919.42
LSTPYMTDT =
CO DATE = 20030731
DEBTOR #1 LAST NAME = SPRAGUE
DEBTOR #1 FIRST NAME = MICHAEL P
DEBTOR #1 MIDDLE NAM =
DEBTOR #1 ADDR 1 = 158 N PANCOAST RD
DEBTOR #1 ADDR 2 =
DEBTOR #1 CITY = FALLS CREEK
DEBTOR #1 STATE = PA
DEBTOR #1 ZIP = 15840
DEBTOR #1 HOMEPHONE = 8143754509
DEBTOR #1 WORKPHONE = 0000000000
DEBTOR #1 SOCSEC = [REDACTED]
DEBTOR #1 DOB =
DEBTOR #2 LAST NAME =
DEBTOR #2 FIRST NAME =
DEBTOR #2 MIDDLE NAM =
DEBTOR #2 ADDR 1 = RR 1
DEBTOR #2 ADDR 2 =
DEBTOR #2 CITY = FALLS CREEK
DEBTOR #2 STATE = PA
DEBTOR #2 ZIP = 158409801
DEBTOR #2 HOMEPHONE = 8143713597
DEBTOR #2 WORKPHONE = 0000000000
DEBTOR # SOCSEC =
DEBTOR#2 DOB =
DEBTOR = 4206054

FILED

SEP 18 2006

**William A. Shaw
Prothonotary/Clerk of Courts**

FILED

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION, L.L.C.
ASSIGNEE OF CHASE MANHATTAN BANK
Plaintiff

No. 06-1509-CD

VS

CIVIL ACTION - LAW

MICHAEL P SPRAGUE
Defendant(s)

PRAECIPE TO REINSTATE

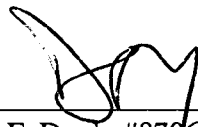
To the Prothonotary:

Kindly reinstate the complaint in the above-referenced matter.

Respectfully Submitted,

Date:

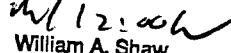
3/9/07



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Philip C. Warholic #86341 / David R. Galloway #87326
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Attorneys in the Practice of Debt Collection
4660 Trindle Road, Suite 300
Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

FILED 

MAR 14 2007


William A. Shaw
Prothonotary/Clerk of Courts

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w/ REINSTATE COM

1 SENT TO ATTY. w/
REINSTATE COM

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

PALISADES COLLECTION, L.L.C. ASSIGNEE OF
CHASE MANHATTAN BANK

No. 06-1509-CD

C/O WOLPOFF & ABRAMSON, L.L.P.
4660 TRINDLE ROAD, 3rd FLOOR
CAMP HILL, PA 17011
Plaintiff

Type of Case: Contract

Type of Pleading:

VS.

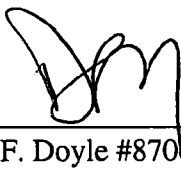
Filed on Behalf of: Plaintiff

MICHAEL P SPRAGUE
158 N PANCOAST RD
FALLS CREEK PA 15840

Defendant(s)

Date:

3/9/07



Amy F. Doyle #87062 / Daniel F. Wolfson #20617
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Telephone: (717) 303-6700
Counsel for Plaintiff

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

PALISADES COLLECTION, L.L.C.
ASSIGNEE OF CHASE MANHATTAN BANK
C/O WOLPOFF & ABRAMSON, L.L.P.
4660 TRINDLE ROAD, 3rd FLOOR
CAMP HILL, PA 17011
Plaintiff

No. 02-1504-CD

Type of Case: Contract

Type of Pleading:

Filed on Behalf of: Plaintiff

VS.

MICHAEL P SPRAGUE
158 N PANCOAST RD
FALLS CREEK PA 15840

Defendant(s)

Date: 9/14/06

Money 14, 2006 Document
Reinstated/Revised to Sheriff/Attorney
for service.

[Signature]
Deputy Prothonotary

C
Amy F. Doyle #87062 / Daniel F. Wolfson #20617
Philip C. Warholc #86341 / Andrew C. Spears #87737
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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.

SEP 18 2006

Attest

[Signature]
Prothonotary
Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION, L.L.C.
ASSIGNEE OF CHASE MANHATTAN BANK

Plaintiff

VS

MICHAEL P SPRAGUE
Defendant(s)

:No.

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814-849-3044

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814-849-3044**

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION, L.L.C.
ASSIGNEE OF CHASE MANHATTAN BANK
Plaintiff

VS

MICHAEL P SPRAGUE
Defendant(s)

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:No.
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:CIVIL ACTION - LAW
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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 PALISADES COLLECTION, L.L.C. ASSIGNEE OF CHASE MANHATTAN BANK, located at 210 Sylvan Avenue Englewood Cliffs, NJ 07632.
2. Defendant, MICHAEL P SPRAGUE, is an adult individual with a last known address of 158 N Pancoast Rd Falls Creek, Clearfield County, PA 15840.
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 \$10,919.42.

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 \$5,874.94.

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 \$2,183.88.

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 \$10,919.42, plus interest in the amount of \$5,874.94, plus attorney's fees in the amount of \$2,183.88, plus costs of this action and any other relief as this Court deems just and reasonable.

Respectfully Submitted,

Date: 9/14/02




Amy F. Doyle #87062 / Daniel F. Wolfson #20617
Philip C. Warholc #86341 / Andrew C. Spears #87737
David R. Galloway #87326 / Tonilyn M. Chippie #87852
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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: 9/14/06



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

Exhibit "A"

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ACCOUNT NUMBER = 4417112566192904
POOL ID = CHASAR
CURRENT BALANCE = 10919.42
LSTPYMTDT =
CO DATE = 20030731
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DEBTOR #1 FIRST NAME = MICHAEL P
DEBTOR #1 MIDDLE NAM =
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DEBTOR #1 ADDR 2 =
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DEBTOR #1 STATE = PA
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DEBTOR #2 ADDR 2 =
DEBTOR #2 CITY = FALLS CREEK
DEBTOR #2 STATE = PA
DEBTOR #2 ZIP = 158409801
DEBTOR #2 HOMEPHONE = 8143713597
DEBTOR #2 WORKPHONE = 0000000000
DEBTOR # SOCSEC =
DEBTOR#2 DOB =
DEBTOR = 4206054

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION, L.L.C.
ASSIGNEE OF CHASE MANHATTAN
BANK

Plaintiff

No. 06-1509-CD

CIVIL ACTION - LAW

VS

MICHAEL P SPRAGUE
Defendant(s)

PRAECIPE TO DISCONTINUE

To the Prothonotary:

Please mark the above-entitled case as discontinued without prejudice.

Respectfully Submitted,

Date:

3/15/07



Amy F. Doyle #87062 / Daniel F. Wolfson #20617
Philip C. Warholc #86341 / 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, Suite 300
Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

FILED 3cc + 1 cert
m/l: 35 um of disc issued
MAR 16 2007 to Atty Chippie
(LM)

William A. Shaw
Prothonotary/Clerk of Courts

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

CIVIL DIVISION

COPY

**Palisades Collection, L.L.C.
Chase Manhattan Bank**

**Vs.
Michael P. Sprague**

No. 2006-01509-CD

CERTIFICATE OF DISCONTINUATION

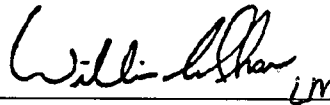
Commonwealth of PA
County of Clearfield

I, William A. Shaw, Prothonotary of the Court of Common Pleas in and for the County and Commonwealth aforesaid do hereby certify that the above case was on March 16, 2007, marked:

Discontinued without prejudice

Record costs in the sum of \$92.00 have been paid in full by Wolpoff & Abramson LLP .

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 16th day of March A.D. 2007.



William A. Shaw, Prothonotary