

06-1604-CD  
Palisades Coll. Vs Robin M. Lumadue

2006-1604-CD  
Palisades Collect et al vs Robin Lumadue

**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, 3<sup>rd</sup> FLOOR  
CAMP HILL, PA 17011

No. 2006-1604-cd

Plaintiff

Type of Case: Contract

Type of Pleading:

VS.

Filed on Behalf of: Plaintiff

ROBIN M LUMADUE  
556 LUMBER CITY HWY  
MAHAFFEN PA 15757

Defendant(s)

Date: 9/25/06

*Amy Doyle*  
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, Suite 300  
Camp Hill, PA 17011  
Telephone: (717) 303-6700  
Counsel for Plaintiff

**FILED**

OCT 02 2006

11/2/06

William A. Shaw  
Prothonotary/Clerk of Courts

2 CERT TO STAFF

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

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

:No.

Plaintiff

:

VS

:

ROBIN M LUMADUE  
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

PALISADES COLLECTION,L.L.C.	:No.
ASSIGNEE OF CHASE MANHATTAN BANK	:
Plaintiff	:
VS	:CIVIL ACTION - LAW
ROBIN M LUMADUE	:
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-  
814-765-2641

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION,L.L.C.	:No.
ASSIGNEE OF CHASE MANHATTAN BANK	:
Plaintiff	:
VS	:
ROBIN M LUMADUE	: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 PALISADES COLLECTION,L.L.C. ASSIGNEE OF CHASE MANHATTAN BANK , located at 210 Sylvan Avenue Englewood Cliffs, NJ 07632.
2. Defendant, ROBIN M LUMADUE, is an adult individual with a last known address of 556 Lumber City Hwy Mahaffen, Clearfield County, PA 15757.
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 \$9,257.36.

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 \$4,807.23.

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 \$1,851.47.

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 \$9,257.36, plus interest in the amount of \$4,807.23, plus attorney's fees in the amount of \$1,851.47, plus costs of this action and any other relief as this Court deems just and reasonable.

Respectfully Submitted,

Date: 9/25/06



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, Suite 300  
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: 9/25/16

  
\_\_\_\_\_  
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, Suite 300  
Camp Hill, PA 17011  
Telephone: (717) 303-6700  
Counsel for Plaintiff

# **Exhibit "A"**

PLAINTIFF = 425230  
ACCOUNT NUMBER = 5417126717323249  
POOL ID = CHASAR  
CURRENT BALANCE = 9257.36  
LSTPYMTDT =  
CO DATE = 20031031  
DEBTOR #1 LAST NAME = LUMADUE  
DEBTOR #1 FIRST NAME = ROBIN M  
DEBTOR #1 MIDDLE NAM =  
DEBTOR #1 ADDR 1 = PO BOX 4  
DEBTOR #1 ADDR 2 =  
DEBTOR #1 CITY = LA JOSE  
DEBTOR #1 STATE = PA  
DEBTOR #1 ZIP = 157530004  
DEBTOR #1 HOMEPHONE = 0000000000  
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 =  
DEBTOR #2 ADDR 2 =  
DEBTOR #2 CITY =  
DEBTOR #2 STATE =  
DEBTOR #2 ZIP =  
DEBTOR #2 HOMEPHONE =  
DEBTOR #2 WORKPHONE =  
DEBTOR # SOCSEC =  
DEBTOR#2 DOB =  
DEBTOR = 4216304

**In The Court of Common Pleas of Clearfield County, Pennsylvania**

Service # 1 of 1 Services

Sheriff Docket # **101983**

PALISADES COLLECTION, L.L.C. Assignee

Case # 06-1604-CD

vs.

ROBIN M. LUMADUE

**FILED**  
01/11/2007  
JAN 24 2007  
W.A. Shaw  
Prothonotary/Clerk of Courts

TYPE OF SERVICE COMPLAINT

**SHERIFF RETURNS**

William A. Shaw  
Prothonotary/Clerk of Courts

NOW January 24, 2007 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT "NOT FOUND" AS TO ROBIN M. LUMADUE, DEFENDANT. SEVERAL ATTEMPTS, NOT HOME.

SERVED BY: /

**Return Costs**

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	WOLPOFF	84783	10.00
SHERIFF HAWKINS	WOLPOFF	84783	90.00

Sworn to Before me This

So Answers,

\_\_\_\_ Day of \_\_\_\_\_ 2007

  
Chester A. Hawkins  
Sheriff

**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, 3<sup>rd</sup> FLOOR  
CAMP HILL, PA 17011

No. 2006-1604-CD

Plaintiff

Type of Case: Contract

VS.

ROBIN M LUMADUE  
556 LUMBER CITY HWY  
MAHAFFEN PA 15757

Type of Pleading:

Filed on Behalf of: Plaintiff

Defendant(s)

Date: 9/25/06

*Amy Doyle*  
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, 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.

OCT 02 2006

Attest.

*William B. Ober*  
Prothonotary/  
Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION,L.L.C.	:No.
ASSIGNEE OF CHASE MANHATTAN BANK	:
Plaintiff	:
VS	:CIVIL ACTION - LAW
ROBIN M LUMADUE	:
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

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

VS

ROBIN M LUMADUE  
Defendant(s)

:No.  
:  
:  
:  
:  
:  
:  
:  
CIVIL ACTION - LAW

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 A 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

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

:No.

VS  
ROBIN M LUMADUE  
Defendant(s)

:CIVIL ACTION - LAW

**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, ROBIN M LUMADUE, is an adult individual with a last known address of 556 Lumber City Hwy Mahaffen, Clearfield County, PA 15757.
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 \$9,257.36.

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 \$4,807.23.

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 \$1,851.47.

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 \$9,257.36, plus interest in the amount of \$4,807.23, plus attorney's fees in the amount of \$1,851.47, plus costs of this action and any other relief as this Court deems just and reasonable.

Respectfully Submitted,

Date: 9/25/06



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, Suite 300  
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: 9/25/16

  
\_\_\_\_\_  
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, Suite 300  
Camp Hill, PA 17011  
Telephone: (717) 303-6700  
Counsel for Plaintiff

# **Exhibit "A"**

PLAINTIFF = 425230  
ACCOUNT NUMBER = 5417126717323249  
POOL ID = CHASAR  
CURRENT BALANCE = 9257.36  
LSTPYMTDT =  
CO DATE = 20031031  
DEBTOR #1 LAST NAME = LUMADUE  
DEBTOR #1 FIRST NAME = ROBIN M  
DEBTOR #1 MIDDLE NAME =  
DEBTOR #1 ADDR 1 = PO BOX 4  
DEBTOR #1 ADDR 2 =  
DEBTOR #1 CITY = LA JOSE  
DEBTOR #1 STATE = PA  
DEBTOR #1 ZIP = 157530004  
DEBTOR #1 HOMEPHONE = 0000000000  
DEBTOR #1 WORKPHONE = 0000000000  
DEBTOR #1 SOCSEC = 1 [REDACTED]  
DEBTOR #1 DOB =  
DEBTOR #2 LAST NAME =  
DEBTOR #2 FIRST NAME =  
DEBTOR #2 MIDDLE NAME =  
DEBTOR #2 ADDR 1 =  
DEBTOR #2 ADDR 2 =  
DEBTOR #2 CITY =  
DEBTOR #2 STATE =  
DEBTOR #2 ZIP =  
DEBTOR #2 HOMEPHONE =  
DEBTOR #2 WORKPHONE =  
DEBTOR #2 SOCSEC =  
DEBTOR #2 DOB =  
DEBTOR = 4216304

# COPY

**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, 3<sup>rd</sup> FLOOR  
CAMP HILL, PA 17011

No. 2006-1604-CO

Plaintiff

Type of Case: Contract

VS.

ROBIN M LUMADUE  
556 LUMBER CITY HWY  
MAHAFFEN PA 15757

Type of Pleading:

Filed on Behalf of: Plaintiff

Defendant(s)

Date: 9/25/06

*Amy Doyle*  
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, 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.

OCT 02 2006

Attest.

*William L. Brown*  
Prothonotary/  
Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION,L.L.C.	:No.
ASSIGNEE OF CHASE MANHATTAN BANK	:
Plaintiff	:
VS	:CIVIL ACTION - LAW
ROBIN M LUMADUE	:
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

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

:No.

VS  
ROBIN M LUMADUE  
Defendant(s)

:CIVIL ACTION - LAW

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 A 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

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

:No.

VS

ROBIN M LUMADUE  
Defendant(s)

:CIVIL ACTION - LAW

**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:

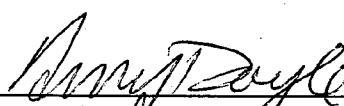
1. Plaintiff is PALISADES COLLECTION,L.L.C. ASSIGNEE OF CHASE MANHATTAN BANK , located at 210 Sylvan Avenue Englewood Cliffs, NJ 07632.
2. Defendant, ROBIN M LUMADUE, is an adult individual with a last known address of 556 Lumber City Hwy Mahaffen, Clearfield County, PA 15757.
3. It is averred that Defendant 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 \$9,257.36.
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 \$4,807.23.
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 \$1,851.47.
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 \$9,257.36, plus interest in the amount of \$4,807.23, plus attorney's fees in the amount of \$1,851.47, plus costs of this action and any other relief as this Court deems just and reasonable.

Respectfully Submitted,

Date: 9/25/06

  
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, Suite 300  
Camp Hill, PA 17011  
Telephone: (717) 303-6700  
Counsel for Plaintiff

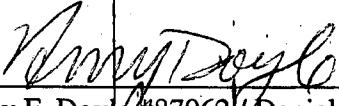
VERIFICATION

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: 9/25/16

  
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, Suite 300  
Camp Hill, PA 17011  
Telephone: (717) 303-6700  
Counsel for Plaintiff

**Exhibit "A"**

PLAINTIFF = 425230  
ACCOUNT NUMBER = 5417126717323249  
POOL ID = CHASAR  
CURRENT BALANCE = 9257.36  
LSTPYMTDT =  
CO DATE = 20031031  
DEBTOR #1 LAST NAME = LUMADUE  
DEBTOR #1 FIRST NAME = ROBIN M  
DEBTOR #1 MIDDLE NAM =  
DEBTOR #1 ADDR 1 = PO BOX 4  
DEBTOR #1 ADDR 2 =  
DEBTOR #1 CITY = LA JOSE  
DEBTOR #1 STATE = PA  
DEBTOR #1 ZIP = 157530004  
DEBTOR #1 HOMEPHONE = 00000000000  
DEBTOR #1 WORKPHONE = 00000000000  
DEBTOR #1 SOCSEC = XXXXXXXXXX  
DEBTOR #1 DOB =  
DEBTOR #2 LAST NAME =  
DEBTOR #2 FIRST NAME =  
DEBTOR #2 MIDDLE NAM =  
DEBTOR #2 ADDR 1 =  
DEBTOR #2 ADDR 2 =  
DEBTOR #2 CITY =  
DEBTOR #2 STATE =  
DEBTOR #2 ZIP =  
DEBTOR #2 HOMEPHONE =  
DEBTOR #2 WORKPHONE =  
DEBTOR # SOCSEC =  
DEBTOR#2 DOB =  
DEBTOR = 4216304

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

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

No. 2006-1604-CD  
CIVIL ACTION - LAW

VS

ROBIN M LUMADUE  
Defendant(s)

**PRAECIPE TO DISCONTINUE**

To the Prothonotary:

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

Respectfully Submitted,

Date: 10/27/07

  
\_\_\_\_\_  
Amy F. Doyle #87062 / Daniel F. Wolfson #20617  
Philip C. Warholic #86341 / David R. Galloway #87326  
Tonilyn M. Chippie #87852 / Sarah E. Ehasz #86469  
Robert N. Polas, Jr. #201259 / Ronald S. Canter #94000  
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** *1CCd/Cert*  
*n/a: 05 cm* *of disc issued*  
**NOV - 8 2007** *to Atty*  
*WAM* *Galloway*  
William A. Shaw  
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

No. 2006-1604-CD

vs.

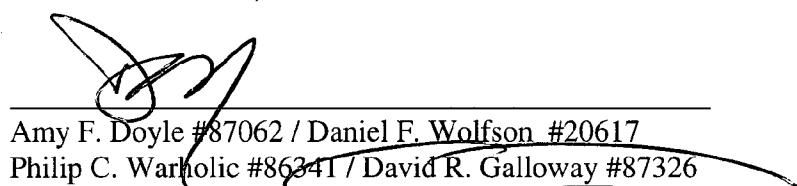
CIVIL ACTION - LAW

ROBIN M LUMADUE  
Defendant(s)

**CERTIFICATE OF SERVICE**

The undersigned does hereby certify that a copy of the foregoing praecipe was served this date by Regular Mail, Postage Pre-Paid on this 27<sup>th</sup> day of October, 2001.

Joseph Ellermeyer  
379 Main Street  
Brookville, PA 15825

  
Amy F. Doyle #87062 / Daniel F. Wolfson #20617  
Philip C. Warkolic #86341 / David R. Galloway #87326  
Tonilyn M. Chippie #87852 / Sarah E. Ehasz #86469  
Robert N. Polas, Jr. #201259 / Ronald S. Canter #94000  
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

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

*COPY*

**Palisades Collection, LLC  
Chase Manhattan Bank**

**Vs.  
Robin M. Lumadue**

**No. 2006-01604-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 November 8, 2007, marked:

Discontinued without prejudice

Record costs in the sum of \$85.00 have been paid in full by Wolpoff & Abramson .

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 8th day of November A.D. 2007.

*William A. Shaw*

*LM*

\_\_\_\_\_  
William A. Shaw, Prothonotary