

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

CACH, LLC

Plaintiff

vs.

DENISE M SHAFFER

Defendant

No: 06-2006-CD

COMPLAINT IN CIVIL ACTION

FILED ON BEHALF OF
Plaintiff

COUNSEL OF RECORD OF
THIS PARTY:

James C. Warmbrodt, 42524
WELTMAN, WEINBERG & REIS CO., L.P.A.
436 Seventh Avenue, Suite 2718
Pittsburgh, PA 15219
(412) 434-7955
FAX: 412-338-7130
05281685 C E Pit SGM

FILED
DEC 01 2006
William A. Shaw
Prothonotary/Clerk of Courts
Atty. pd. 85.00
100 Shff

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

CACH, LLC

Plaintiff

vs.

Civil Action No

DENISE M SHAFFER

Defendant

COMPLAINT AND NOTICE TO DEFEND

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by an attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

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

COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
230 EAST MARKET ST., SUITE 228
CLEARFIELD, PA 16830
(814) 765-2641, ext 1300-1301

COMPLAINT

1. Plaintiff, CACH, LLC is a corporation with offices at 370 17TH ST., SUITE 5000 DENVER , CO 80202 .

2. Defendant is adult individual(s) residing at the address listed below:

DENISE M SHAFFER
1618 TREASURE LK
DU BOIS, PA 15801

3. Defendant applied for and received a credit card bearing the account number 4465680900545632 .


4. Defendant made use of said credit card and has a current balance due of \$7241.06 , as of September 27, 2006 .

5. Defendant is in default by failing to make monthly payments when due. As such, the entire balance is immediately due and payable to Plaintiff.

6. Plaintiff is entitled to the addition of interest at the rate of 6.000% per annum on the unpaid balance from September 27, 2006 . A copy of Plaintiff's STATEMENT is attached hereto, marked as Exhibit "1" and made a part hereof.

7. Although repeatedly requested to do so by Plaintiff, Defendant has willfully failed and/or refused to pay the balance due to Plaintiff.

Wherefore, the Plaintiff prays for judgment in its favor and against Defendant , DENISE M SHAFFER , INDIVIDUALLY ; in the amount of \$7241.06 with continuing interest thereon at the rate of 6.000% per annum from September 27, 2006 plus costs.



James C. Warmbrodt, 42524
WELTMAN, WEINBERG & REIS CO., L.P.A.
436 Seventh Avenue, Suite 2718
Pittsburgh, PA 15219
(412) 434-7955
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05281685 C E Pit SGM

This law firm is a debt collector attempting to collect this debt for our client and any information obtained will be used for that purpose.

0528-1685

	PAYMENT DUE DATE	MINIMUM PAYMENT	BALANCE AS OF 10/13/2004	ACCOUNT NUMBER
P.O. Box 660433, Dallas, TX 75266-0433	11/09/04	\$1,469.00	\$6,709.56	4465-6809-0054-5632
Indicate Change of Address Below (use blue or black ink)				
Address: _____ Apt: _____				AMOUNT ENCLOSED (use blue or black ink)
City: _____ State: _____ Zip: _____				\$ <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>
Home Phone: _____ Work Phone: _____				N 000 Make Checks Payable to Washington Mutual
E-Mail: _____				

PROVIDIAN PROCESSING SVCS.
P.O. BOX 660487
DALLAS TX 75266-0487

DENISE M SHAFFER
1618 TREASURE LK
DU BOIS PA 15801-9043

38423



4465680900545632 0146900 0670956 0022800 12

DETACH HERE

0-7
1-2

C COLR9001 6092 0003 846 7 041013 Page 1 of 1 N 000 38423

Important Messages

YOUR ACCOUNT IS PAST DUE AND OVER ITS CREDIT LIMIT. Please pay the minimum payment listed above along with the overlimit amount immediately or call us at 1-800-280-9441.

Account Summary

Account Number	4465-6809-0054-5632	Previous Balance	\$6,709.56
Statement Date	10/13/04	Credits & Payments	\$0.00
Minimum Payment of \$1,469.00	due by 11/09/04	Purchases & Other Charges	\$39.00
Credit Line	\$5,449.00	Cash Advances	\$0.00
Available Credit Line as of 10/13/04	\$0.00	FINANCE CHARGE	\$125.90
Available Credit for Cash Advances as of 10/13/04	\$0.00	NEW BALANCE	\$6,709.56
Days in Current Billing Cycle	29		

Transactions

Tran Date	Post Date	Description	Reference Number	Amount
Oct 12	Oct 12	LATE PAYMENT CHARGE	0000	\$39.00

FOR BILLING ERRORS AND IMPORTANT INFORMATION, SEE REVERSE SIDE.

Balance Category

	Average Daily Balance	Daily Periodic Rate	Annual % Rate (APR)	Finance Charges	Grace Terms
Standard Purchase - Current Cycle	\$6,607.90	.0657%	23.99%	\$125.90	Term A
Standard Cash - Current Cycle	\$0.00	.0657%	23.99%	\$0.00	Term B

ANNUAL PERCENTAGE RATE this billing cycle: 22.86%

For 24-hour Automated Account Information, please call 1-800-280-0561 or visit us at www.providian.com


Your account is Issued by Providian National Bank, Tilton, NH.

EXHIBIT

" / "

VERIFICATION

The undersigned does hereby verify subject to the penalties of 18 PA C.S. 4904 relating to unsworn falsifications to authorities that he is Jeffrey Weyand, Authorized Agent of CACH, LLC, plaintiff herein, that he is duly authorized to make this verification, and that the facts set forth in the foregoing Complaint are true and correct to the best of his knowledge, information and belief.


Jeffrey Weyand

This law firm is a debt collector attempting to collect this debt for our client and any information obtained will be used for that purpose.

WWR# 05281685

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102202
NO: 06-2006-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: CACH, LLC
vs.
DEFENDANT: DENISE M. SHAFFER

FILED
0/3:00
MAR 06 2007
(5)

William A. Shaw
Prothonotary/Clerk of Courts

SHERIFF RETURN

NOW, December 05, 2006 AT 12:26 PM SERVED THE WITHIN COMPLAINT ON DENISE M. SHAFFER DEFENDANT AT 540 BUCCO REED RD., LOT 3 SEC 95, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO DENISE M. SHAFFER, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: COUDRIET / NEVLING

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	WELTMAN	2621146	10.00
SHERIFF HAWKINS	WELTMAN	2621146	34.91

Sworn to Before Me This

_____ Day of _____ 2007

So Answers,

Chester A. Hawkins
by Mary L. Harris

Chester A. Hawkins
Sheriff

FILED

APR 12 2007

W 11:50 (u)

William A. Shaw

Prothonotary/Clerk of Courts

1 CENT w/NOTICE TO
DEPT.

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

CACH, LLC

Plaintiff

vs.

DENISE M SHAFFER

Defendant

No. 06-2006-CD

PRAECIPE FOR DEFAULT JUDGMENT

FILED ON BEHALF OF
Plaintiff

COUNSEL OF RECORD OF
THIS PARTY:

WILLIAM T. MOLCZAN, ESQUIRE
PA I.D.#47437
Weltman, Weinberg & Reis Co., L.P.A.
2718 Koppers Bldg.
436 Seventh Avenue
Pittsburgh, PA 15219
(412) 434-7955

WWR#05281685
Judgment Amount \$ 7,463.59

**THIS LAW FIRM IS ATTEMPTING TO COLLECT THIS DEBT FOR ITS CLIENT AND ANY
INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.**

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

CACH, LLC

Plaintiff

vs.

Civil Action No. 06-2006-CD

DENISE M SHAFFER

Defendant

PRAECIPE FOR DEFAULT JUDGMENT


TO THE PROTHONOTARY:

Kindly enter Judgment against the Defendant, DENISE M SHAFFER above named, in the default of an Answer, in the amount of \$7,463.59 computed as follows:

Amount claimed in Complaint	\$7,241.06
Interest from SEPTEMBER 27, 2006 TO APRIL 2, 2007 at the legal interest rate of 6% per annum	\$222.53
TOTAL	\$7,463.59

I hereby certify that appropriate Notices of Default, as attached have been mailed in accordance with PA R.C.P. 237.1 on the dates indicated on the Notices.

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

By: 
WILLIAM T. MOLCZAN, ESQUIRE
PA I.D.#47437

Welman, Weinberg & Reis Co., L.P.A.
2718 Koppers Bldg.
436 Seventh Avenue
Pittsburgh, PA 15219
(412) 434-7955
WWR#05281685

Plaintiff's address is:

c/o Weltman, Weinberg & Reis Co., L.P.A., 2718 Koppers Building, 436 7th Avenue, Pittsburgh, PA 15219

And that the last known address of the Defendant is: 1618 TREASURE LK DU BOIS, PA 15801

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

CACH, LLC

Plaintiff

vs.

Civil Action No. 06-2006-CD

DENISE M SHAFFER

Defendant

NOTICE OF JUDGMENT OR ORDER

TO: ☐ Plaintiff
 ☒ Defendant
 ☐ Garnishee

You are hereby notified that the following
Order or Judgment was entered against you
on April 12, 2007

(xx) Assumpsit Judgment in the amount
 of \$7,463.59 plus costs.

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

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

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

Prothonotary

By: 
PROTHONOTARY (OR DEPUTY)

DENISE M SHAFFER
1618 TREASURE LK
DU BOIS, PA 15801

Plaintiff's address is:
c/o Weltman, Weinberg & Reis Co., L.P.A., 2718 Koppers Building, 436 7th Avenue, Pittsburgh, PA 15219
1-888-434-0085

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

CACH, LLC

Case no: 06-2006-CD

Plaintiff

NON-MILITARY AFFIDAVIT

vs.

DENISE M SHAFFER

Defendant

The undersigned, who first being duly sworn, according to law, deposes and states as follows:

That he/she is the duly authorized agent of the Plaintiff in the within matter.

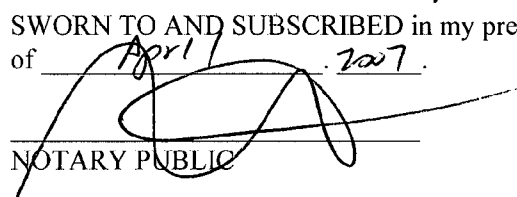
Affiant further states that the within Affidavit is made pursuant to and in accordance with the Servicemembers' Civil Relief Act (SCRA), 50 U.S.C. App. § 521.

Affiant further states that based upon investigation it is the affiant's belief that the Defendant, DENISE M SHAFFER is not in the military service.

Affiant further states that this belief is supported by the attached certificate from the Defense Manpower Data Center (DMDC), which states that the Defendant, DENISE M SHAFFER is not in the military service.

Further Affiant sayeth naught.


AFFIANT

SWORN TO AND SUBSCRIBED in my presence this 9 day
of April, 2007.

NOTARY PUBLIC

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Wendy L. Gault, Notary Public
City Of Pittsburgh, Allegheny County
My Commission Expires July 15, 2010
Member, Pennsylvania Association of Notaries

This law firm is a debt collector attempting to collect this debt for our client and any information obtained will be used for that purpose.

Department of Defense Manpower Data Center

APR-02-2007 07:11:12



Military Status Report
Pursuant to the Servicemembers Civil Relief Act

◀ Last Name	First/Middle	Begin Date	Active Duty Status	Service/Agency
SHAFFER	DENISE M	Based on the information you have furnished, the DMDC does not possess any information indicating that the individual is currently on active duty.		

Upon searching the information data banks of the Department of Defense Manpower Data Center, based on the information that you provided, the above is the current status of the individual as to all branches of the Military.

A handwritten signature in black ink that reads "Mary M. Snavely-Dixon".

Mary M. Snavely-Dixon, Director
Department of Defense - Manpower Data Center
1600 Wilson Blvd., Suite 400
Arlington, VA 22209-2593

The Defense Manpower Data Center (DMDC) is an organization of the Department of Defense that maintains the Defense Enrollment and Eligibility Reporting System (DEERS) database which is the official source of data on eligibility for military medical care and other eligibility systems.

The Department of Defense strongly supports the enforcement of the Servicemembers Civil Relief Act [50 USCS Appx. #167;#167; 501 et seq] (SCRA) (formerly the Soldiers' and Sailors' Civil Relief Act of 1940). DMDC has issued hundreds of thousands of "does not possess any information indicating that the individual is currently on active duty" responses, and has experienced a small error rate. In the event the individual referenced above, or any family member, friend, or representative asserts in any manner that the individual is on active duty, or is otherwise entitled to the protections of the SCRA, you are strongly encouraged to obtain further verification of the person's active duty status by contacting that person's Military Service via the "defenselink.mil" URL provided below. If you have evidence the person is on active-duty and you fail to obtain this additional Military Service verification, provisions of the SCRA may be invoked against you.

If you obtain further information about the person (e.g., an SSN, improved accuracy of DOB, a middle name), you can submit your request again at this Web site and we will provide a new certificate for that query.

This response reflects current active duty status only. For historical information, please contact the Military Service SCRA points-of-contact.

See: <http://www.defenselink.mil/faq/pis/PC09SLDR.html>

WARNING: This certificate was provided based on a name and Social Security number (SSN) provided

by the requester. Providing an erroneous name or SSN will cause an erroneous certificate to be provided.

*Report ID: **CELTYOWFCQS***

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

CACH, LLC

Plaintiff

Case # 06-206-CD

DENISE M SHAFFER

Defendant(s)

IMPORTANT NOTICE

TO: DENISE M SHAFFER
1618 TREASURE LK
DU BOIS, PA 15801

Date of Notice: 3/19/07

WWR#: 05281685

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 OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN 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 PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE FOLLOWING OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

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COURT ADMINSTRATOR
CLEARFIELD COUNTY COURTHOUSE
230 EAST MARKET ST., SUITE 228
CLEARFIELD, PA 16830
(814) 765-2641, ext. 1300-1301

BY: Patrick Thomas Woodman
PATRICK THOMAS WOODMAN
PA I.D. #34507
WELTMAN, WEINBERG & REIS CO., L.P.A.
2718 KOPPERES BLDG, 436 7TH AVE.
PITTSBURGH, PA 15219