



COURT OF COMMON PLEAS OF CLEARFIELD COUNTY  
PENNSYLVANIA

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(5)

William A. Shaw  
Prothonotary/Clerk of Courts

Bank of America, N.A., USA

(Plaintiff)

c/o David Apothaker, Esquire  
2417 Welsh Road, Suite 21 #520

(Street Address)

Philadelphia, PA 19114

(City, State ZIP)

CIVIL ACTION

No. 06-2017-CD

Type of Case: \_\_\_\_\_

Type of Pleading: \_\_\_\_\_

VS.

Robert Johnson

(Defendant)

84 Breezewood Ave.

(Street Address)

Du Bois, PA 15801-1102

(City, State ZIP)

Filed on Behalf of:

Bank of America, N.A., USA

(Plaintiff/Defendant)

David J Apothaker, Esquire

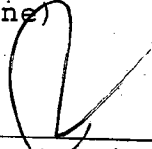
(Filed by)

2417 Welsh Road, Suite 21 #520  
Philadelphia, PA 19114

(Address)

215-634-8920

(Phone)

  
(Signature)



APOTHAKE & ASSOCIATES, P.C.  
BY: David J. Apothaker  
Attorney I.D.#38423  
2417 Welsh Road, Suite 21 #520  
Philadelphia, PA 19114  
(215) 634-8920  
Attorneys for Plaintiff

BANK OF AMERICA, N.A., USA	)	COURT OF COMMON PLEAS
c/o David J Apothaker, Esquire	)	CLEARFIELD COUNTY
2417 Welsh Road, Suite 21 #520	)	
Philadelphia, PA 19114	)	NO.:
Plaintiff,	)	
vs.	)	
	)	
ROBERT JOHNSON	)	
84 BREEZEWOOD AVE	)	
DU BOIS, PA 15801-1102	)	
Defendant.	)	
	)	

CIVIL ACTION COMPLAINT  
FIRST COUNT

1. Plaintiff, BANK OF AMERICA, N.A., USA, is a company with its principal place of business located at c/o David J Apothaker, Esq. 2417 Welsh Road, Suite 21 #520, Philadelphia, PA 19114.
2. Defendant is ROBERT JOHNSON, an adult individual residing at 84 BREEZEWOOD AVE DU BOIS, PA 15801-1102.
3. At the special instance and request of Defendant, Plaintiff sold and delivered to Defendant goods and/or services at the times, of the kinds, in the quantities, and for the prices set forth in Plaintiff's records. A true and correct copy of which is attached hereto, incorporated herein by reference and designated Exhibit "A".
4. Defendant received and accepted the goods and/or services described in Exhibit "A".
5. The prices set forth in Exhibit "A" are the fair, reasonable and market prices for said goods and/or services, and the prices which Defendant agreed to pay.
6. All credits, if any, to which Defendant is entitled, are set forth in Exhibit "A".
7. In addition, Plaintiff avers that Defendant has failed and continues to fail to make any payments, leaving a balance due and owing of \$11,351.79 from February 23, 2006.

8. Although demand has been made, Defendant has failed to make payment of the amount due as above.

WHEREFORE, Plaintiff demands judgment in favor of Plaintiff and against Defendant(s) for the sum of \$11,351.79 plus costs, and reasonable attorney's fees.

APOTHAKER & ASSOCIATES, P.C.  
Attorney for Plaintiff  
A Law Firm Engaged in Debt Collection

BY: 

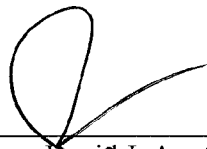
\_\_\_\_\_  
David J. Apothaker

Dated: 11/22/2006

Our File No.: 82267

**VERIFICATION**

David J. Apothaker, Esq. hereby states that I am counsel for plaintiff in this action, and that I am authorized to take this Verification, and that the statements made in the foregoing Civil Action Complaint are true and correct to the best of my knowledge, information, and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 Pa.C.S.A. 4904 relating to unsworn falsification to authorities.

A handwritten signature in black ink, consisting of a large, stylized 'D' followed by a horizontal line and a short upward stroke.

---

David J. Apothaker, Esq.  
Attorney for Plaintiff

DATE: 11/22/2006

BANK OF AMERICA, N.A., USA  
c/o David J Apothaker, Esquire  
2417 Welsh Road, Suite 21 #520  
Philadelphia, PA 19114

ROBERT JOHNSON  
84 BREEZEWOOD AVE  
DU BOIS, PA 15801-1102

STATEMENT OF ACCOUNT

Debtor's Name:	ROBERT JOHNSON
Account Number:	4071297000922839
Original Creditor:	BANK OF AMERICA, N.A., USA
Date of Debt:	February 23, 2006
Balance Due:	\$11,351.79

Our File No.: 82267

EXHIBIT "A"

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102213  
NO: 06-2017-CD  
SERVICE # 1 OF 1  
COMPLAINT

PLAINTIFF: BANK OF AMERICA, N.A., USA  
vs.  
DEFENDANT: ROBERT JOHNSON

SHERIFF RETURN

NOW, December 29, 2006 AT 1:15 PM SERVED THE WITHIN COMPLAINT ON ROBERT JOHNSON DEFENDANT AT 84 BREEZEWOOD AVE., DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO HELEN BOWMAN, WIFE A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: COUDRIET /

**FILED**  
01/31/13  
MAR 08 2007  
William A. Shaw  
Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	APOTHAKE	38605G	10.00
SHERIFF HAWKINS	APOTHAKE	38605G	51.82

Sworn to Before Me This

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

So Answers,

*Chester A. Hawkins*  
by *Marilyn Harris*  
Chester A. Hawkins  
Sheriff



Our File No.: 82267  
APOTHAKER & ASSOCIATES, P.C.  
BY: David J. Apothaker  
Attorney I.D.# 38423  
2417 Welsh Road, Suite 21 #520  
Philadelphia, PA 19114  
(215) 634-8920  
Attorney for Plaintiff

BANK OF AMERICA, N.A., USA

Plaintiff,

vs.

ROBERT JOHNSON

Defendant.

) COURT OF COMMON PLEAS

) CLEARFIELD COUNTY

) NO. 06-2017

**PRAECIPE TO DISMISS WITHOUT PREJUDICE**

TO THE PROTHONOTARY:

Kindly dismiss this action without prejudice.

APOTHAKER & ASSOCIATES, P.C.  
Attorneys for Plaintiff  
A Law Firm Engaged in Debt Collection

By:

  
David J. Apothaker

Dated: 3/10/2008

**FILED** NO CC  
MAR 24 2008  
⑥

William A. Shaw  
Prothonotary/Clerk of Courts

**FILED**

**MAR 24 2008**

William A. Shaw  
Prothonotary/Clerk of Courts