

07-418-CD  
Harvest Credit vs Bobbi Shaffer

Harvest Credit et al vs Bobbi Shaffer  
2007-418-CD

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

HARVEST CREDIT MANAGEMENT LLC, a limited liability company, assignee of Chas Manhattan	CIVIL DIVISION
Plaintiff(s),	No. 2007-418-CD
v.	
BOBBI A SHAFFER an individual	
Defendant(s),	
	COMPLAINT
	Code No. _____
	Filed on Behalf of:
	PLAINTIFF
	ATTORNEY OF RECORD FOR THIS PARTY
	Louis B. Swartz
	PA. ID # 00242
	SWARTZ, LOVEJOY & ASSOCIATES
	16th FLOOR LAW AND FINANCE BUILDING
	PITTSBURGH, PENNSYLVANIA 15219
	(412) 288-0300
	;77083

**FILED** ICC Sheriff  
m:mls  
MAR 19 2007 Atty Pd. 85.00  
W  
William A. Shaw  
Prothonotary/Clerk of Courts

NOTE: THIS IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION  
OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE

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

HARVEST CREDIT MANAGEMENT LLC,  
a limited liability company,  
assignee of Chas Manhattan

Plaintiff(s),

No. 2007

v.

BOBBI A SHAFFER  
an individual

Defendant(s),

**NOTICE TO DEFEND AND CLAIM RIGHTS**

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 days (20) after this Complaint and Notice are served, by entering a written appearance personally or by 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 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, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. 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.

PENNSYLVANIA LAWYER REFERRAL SERVICE  
100 South Street  
P.O. Box 186  
Harrisburg, PA 17108

1-800-692-7375

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

HARVEST CREDIT MANAGEMENT LLC,  
a limited liability company,  
assignee of Chas Manhattan

Plaintiff(s),

No. 2007

v.

BOBBI A SHAFFER  
an individual

Defendant(s),

COMPLAINT

1. Plaintiff(s) is HARVEST CREDIT MANAGEMENT LLC, a limited liability company, assignee of Chas Manhattan. Plaintiff's address is c/o 1600 Law & Finance Building, Pittsburgh, Pa 15219.
2. Defendant(s) is BOBBI A SHAFFER an individual. Defendant's address is 410 S STATE ST, DU BOIS PA 158011558.
3. At Defendant's special instance and request, a credit account was opened for Defendant, which Defendant thereafter used and there is a balance due and unpaid, despite demand, in the amount of \$5,498.16 plus interest from February 28, 2005.
4. Attached hereto as Exhibit "A", and incorporated herein by reference as though herein set forth at length, are true and correct copies of the documents of Defendant's account which were prepared in the ordinary course of business and are incorporated herein by reference. The account has been assigned to Plaintiff for value.

WHEREFORE, Plaintiff demands Judgment against Defendant(s) in the amount of \$5,498.16 plus interest from February 28, 2005 and costs.

  
Louis B. Swartz  
Attorney for PLAINTIFF  
SWARTZ, LOVEJOY & ASSOCIATES  
16th FLOOR LAW AND FINANCE BUILDING  
PITTSBURGH, PENNSYLVANIA 15219

(412) 288-0300

77083

**HARVEST CREDIT MGT VII**  
**LAST STATEMENT DETAILS FOR**  
Chase Manhattan  
ACCOUNT#: 5183375960077596  
LGBS#: EH099322

BOBBI A SHAFFER  
410 S STATE ST  
DU BOIS PA 15801-1558

SSN: XXX-XX-4966

ACCOUNT SUMMARY INFORMATION FOR #5183375960077596			
LAST STATEMENT:	N/A	INTEREST RATE:	24%
BALANCE DUE:	\$5,498.16	LAST PAYMENT:	July 20, 2004
AVAILABLE BALANCE:	\$0.00	OPEN DATE:	May 01, 2002

TRANSACTION	AMOUNT	TRANS. DATE	POST DATE	DETAIL
CHARGE OFF	\$5,498.16	February 28, 2005	February 28, 2005	CHARGE OFF



"Exhibit A"

## ASSIGNMENT AND BILL OF SALE

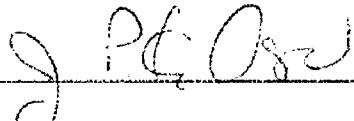
**PRS Assets, LLC** (hereinafter called "Seller") has entered into a Purchase Agreement dated June 16, 2006 ("Agreement"), for the sale of Accounts on "Exhibit A" thereof to **Harvest Credit Management VII, LLC** (hereinafter called "Purchaser"), upon the terms and conditions set forth in that Agreement.

**NOW, THEREFORE**, for good and valuable consideration, Seller hereby sells, assigns, and transfers to Purchaser, its successors and assigns, all of Seller's rights, title, and interest in each and every one of the Accounts described in the Agreement.

Purchaser and Seller agree that the Purchase Price shall be as stated in Section 2 of the Agreement.

**IN WITNESS WHEREOF**, Seller has signed and delivered this instrument on the 21st day of June 2006.

By: \_\_\_\_\_

A handwritten signature in black ink, appearing to read "P.C. Osgood".

**EXHIBIT A**

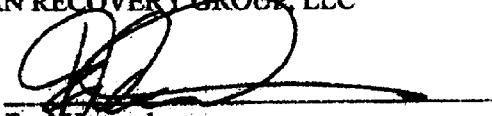
**BILL OF SALE**

FOR VALUE RECEIVED, and pursuant to the terms and conditions of the Portfolio Purchase Agreement between Titan Recovery Group, LLC ("Seller") and PRS ASSETS, LLC ("Purchaser"), dated as of June 21, 2006, Seller does hereby sell, assign and convey to Purchaser, its successors and assigns, all right, title and interest of Seller in and to those certain Charged-off Accounts described in Exhibit "A" attached hereto and made a part hereof for all purposes.

This Bill of Sale is executed without recourse and without representation of any warranty, of collectibility or otherwise, expressed or implied, except as provided in the Portfolio Purchase Agreement.

Executed this 21st day of June 2006

**TITAN RECOVERY GROUP, LLC**

By: 

Fred Howard  
Chief Executive Officer



BILL OF SALE

FOR VALUE RECEIVED, and pursuant to the terms and conditions of the Credit Card Account Purchase Agreement between Chase Manhattan Bank USA, National Association ("Seller") and Titan Recovery Group, LLC ("Purchaser"), dated as of January 15, 2004, Seller does hereby sell, assign and convey to Purchaser, its successors and assigns, all right, title and interest of Seller in and to those certain Accounts described in Exhibit "A" attached hereto and made a part hereof for all purposes.

This BILL OF SALE is executed without recourse and without representation or warranty, of collectibility or otherwise, expressed or implied, except as provided in the Credit Card Account Purchase Agreement.

Executed this 3<sup>rd</sup> day of February, 2005

CHASE MANHATTAN BANK USA,  
NATIONAL ASSOCIATION  
By:   
\_\_\_\_\_  
Brian K. Bonner  
Vice President

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

HARVEST CREDIT MANAGEMENT LLC,  
a limited liability company,  
assignee of Chas Manhattan

Plaintiff(s), |  
v. | No. 2007

BOBBI A SHAFFER  
an individual

Defendant(s), |

**VERIFICATION**

The undersigned, David Ravin, avers  
that he/she is the Vice President of Plaintiff,  
is authorized to make this verification on behalf of  
Plaintiff, the statements of fact contained in the attached  
Complaint are true and correct to the best of his/her  
information, knowledge and belief, and are made subject  
to the penalties of 18 Pa. Cons. Stat. Ann. Section 4904  
relating to unsworn falsification to authorities.

Date

2-17-07



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102576  
NO: 07-418-CD  
SERVICE # 1 OF 1  
COMPLAINT

PLAINTIFF: HARVEST CREDIT MANAGEMENT, LLC

vs.

DEFENDANT: BOBBI A. SHAFFER

FILED

07-15-07  
JUL 13 2007

William A. Shaw  
Prothonotary/Clerk of Courts

SHERIFF RETURN

NOW, March 23, 2007 AT 11:05 AM SERVED THE WITHIN COMPLAINT ON BOBBI A. SHAFFER DEFENDANT AT 410 S. STATE ST., DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO BOBBI A. SHAFFER, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: NEVLING / COUDRIET

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	SWARTZ	36863	10.00
SHERIFF HAWKINS	SWARTZ	36863	73.29

Sworn to Before Me This

So Answers,

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

*Chester A. Hawkins  
by Maury Hauer*  
Chester A. Hawkins  
Sheriff

W

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

HARVEST CREDIT MANAGEMENT LLC, | CIVIL DIVISION  
a limited liability company, |  
assignee of Chas Manhattan |

Plaintiff(s), |  
v. | No. 2007-418 CD

BOBBI A SHAFFER |  
an individual |

Defendant(s), |

FILED 1CC ATTY  
M/11/2007 Doc Swartz  
JUL 22 2007  
JS

William A. Shaw  
Prothonotary/Clerk of Courts

PETITION TO AMEND CAPTION

Code No. \_\_\_\_\_

Filed on Behalf of:

PLAINTIFF

ATTORNEY OF RECORD FOR THIS PARTY

Louis B. Swartz

PA. ID # 00242

SWARTZ, LOVEJOY & ASSOCIATES  
16th FLOOR LAW AND FINANCE BUILDING  
PITTSBURGH, PENNSYLVANIA 15219

(412) 288-0300  
>77083

NOTE: THIS IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION  
OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE

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

HARVEST CREDIT MANAGEMENT LLC,  
a limited liability company,  
assignee of Chas Manhattan

Plaintiff(s),

No. 2007-418 CD

v.

BOBBI A SHAFFER  
an individual

Defendant(s),

**PETITION TO AMEND CAPTION**

TO: THE HONORABLE, THE JUDGES OF SAID COURT

The Petition of Harvest Credit Management VII, LLC, the Plaintiff in the captioned proceedings respectfully represents that:

1. On March 19, 2007 Plaintiff commenced this action by filing a complaint stating a claim in the amount of \$5498.16.
2. The Complaint was not served.
3. Plaintiff's exact legal name and identity is Harvest Credit Management VII, LLC, a limited liability company, assignee of Chase Manhattan.
4. Plaintiff therefore desires to Amend the Caption to state its exact legal name and identity.

WHEREFORE, Plaintiff requests this Honorable Court to enter its Order, Judgment or Decree amending the caption in this case accordingly and granting such other relief that is appropriate.

LOUIS B. SWARTZ, ESQUIRE  
ATTORNEY FOR PLAINTIFF

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

HARVEST CREDIT MANAGEMENT LLC,  
a limited liability company,  
assignee of Chas Manhattan

Plaintiff(s),

No. 2007-418 CD

v.

BOBBI A SHAFFER  
an individual

Defendant(s),

VERIFICATION

The undersigned, Louis B. Swartz, avers  
that the statements of fact contained in the attached  
Petition to Amend Caption are true and correct to the best of my  
information, knowledge and belief, and are made subject  
to the penalties of 18 Pa. Cons. Stat. Ann. Section 4904  
relating to unsworn falsification to authorities.

This verification is made by counsel because  
Plaintiff's verification cannot be obtained in the time  
allowed for filing the pleading. The source of counsel's  
information is David Ravin.

Date

7/18/07



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

HARVEST CREDIT MANAGEMENT LLC,  
a limited liability company,  
assignee of Chas Manhattan

Plaintiff(s),

No. 2007-418 CD

v.

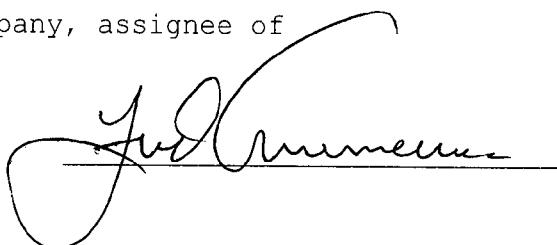
BOBBI A SHAFFER  
an individual

Defendant(s),

ORDER

AND NOW, this 27 day of July, 2007,  
after notice to Defendant and due consideration of Plaintiff's  
Petition to Amend Caption, it is hereby ORDERED, ADJUDGED AND  
DECREEED that the caption in this case be and is hereby  
amended to name Plaintiff as HARVEST CREDIT MANAGEMENT VII,  
LLC, a limited liability company, assignee of  
Chase Manhattan.

AMCAORHA.PLE



FILED  
07/28/07  
JUL 30 2007  
Atty Swartz  
(6K)

William A. Shaw  
Prothonotary/Clerk of Courts

In the court of common pleas of Clearfield County, PA  
Civil Division

Harvest Credit management VII,  
LLC, a limited liability company,  
assignee of Chase Manhattan

Plaintiff(s)

v.

Bobbi Ann Shaffer  
410 S. State St.  
DuBois, PA 15801

No. 2007-418 CD

Defendant

August 10, 2007

Swartz, Lovejoy, & Associates, LLP  
16<sup>th</sup> Floor  
429 Fourth Ave.  
Pittsburgh, PA 15219

RE: Harvest Credit Management  
Chase Manhattan  
Docket Number: 2007-418 CD Clearfield County  
Plaintiff

Response

FILED *Q*  
AUG 10 2007  
01 3:30 PM  
William A. Shaw  
Prothonotary/Clerk of Courts

1 Cieri to  
DEPT.

To Whom It May Concern:

I am writing in response to the Default Notice sent to me on July 31, 2007, to state my defenses. This debt originated while I operated my business, the Flower Center, in DuBois, PA. In 2005, I was forced to close my business due to lack of business and financial strain as I was a single woman with no other income. In an attempt to avoid bankruptcy, I enrolled my credit cards with a debt management company called Credit Solutions of America, Inc. (800-648-4590.) They have helped me to settle two of my debts so far, but the going has been slow due to the fact that I have not been able to secure adequate employment after the closing of my store. As a result, and in an attempt to settle my debts, I listed my house with a realtor, Coldwell Banker, in 2006. Also, to better myself, I returned to school in the fall of 2006.

Currently, my house remains on the market, I am a full-time graduate student at Indiana University of Pennsylvania, and I work part-time. As you can see, I am taking measures to better myself and my situation. I ask that this be taken into consideration when deciding this matter. I also ask that this company be patient in this matter until I am able to settle my debts properly. Thank you in advance for your time and consideration.

Sincerely,

*Bobbi A. Shaffer*

Bobbi Ann Shaffer  
Defendant

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

HARVEST CREDIT MANAGEMENT VII, LLC \* NO. 2007-418-CD  
JUNIPER BANK \*  
Plaintiffs \*  
vs. \*  
BOBBI A. SHAFFER \*  
Defendant \* *5/2/42/kk*

ORDER

*William A. Shaw*  
Prothonotary/Clerk of Court *KIC*

NOW, this 21<sup>st</sup> day of March, 2013, upon the Court's review of the docket and noting no activity for a period of over five years, it is the ORDER of this Court that the case be moved to inactive status. The Prothonotary shall code the case in Full Court as Z-INACTA.

BY THE COURT,



FREDRIC J. AMMERMAN  
President Judge