

07-418-CD

Harvest Credit vs Bobbi Shaffer

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

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

V.

Defendant(s) ,

No. 2007-418-CD

Code No.

PLAINTIFF

Louis B. Swartz

PA. ID # 00242

1 (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

FILED ICC Sheriff
MAR 19 2007 Atty Pd. 85.00

William A. Shaw
Prothonotary/Clerk of Courts

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.

BOBBI A SHAFFER
an individual

Defendant(s),

No. 2007

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), |

v. |

BOBBI A SHAFFER |
an individual |

Defendant(s), |

No. 2007

COMPLAINT

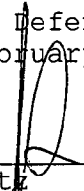
1. Plaintiff(s) is HARVEST CREDIT MANAGEMENT LLC, a limited liability company, assignee of Chas Manhattan. Plaintiff's address is c/o 1600 Law & Finance Building, Pittsburgh, Pa 15219.

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

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

77083

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: _____

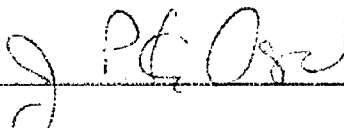
A handwritten signature in dark ink, appearing to read "J. P. Ose", is written over a horizontal line that serves as a signature line.

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 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 of any warranty, of collectibility or otherwise, expressed or implied, except as provided in the Credit Card Account Purchase Agreement.

Executed this 3rd 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.

BOBBI A SHAFFER
an individual

Defendant(s),


No. 2007

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
0131560
JUL 13 2007
(SM)

SHERIFF RETURN

William A. Shaw
Prothonotary/Clerk of Courts

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

_____ Day of _____ 2007

So Answers,


Chester A. Hawkins
Sheriff

UN

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

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

Plaintiff(s),

v.

BOBBI A SHAFFER
an individual

Defendant(s),

CIVIL DIVISION

No. 2007-418 CD

FILED ICC AM
m/ll: Dum Swartz
JUL 23 2007
(5)

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),

v.

BOBBI A SHAFFER
an individual

Defendant(s),

No. 2007-418 CD


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),

v.

BOBBI A SHAFFER
an individual

Defendant(s),

No. 2007-418 CD

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

VERIFYAT.PLE



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.

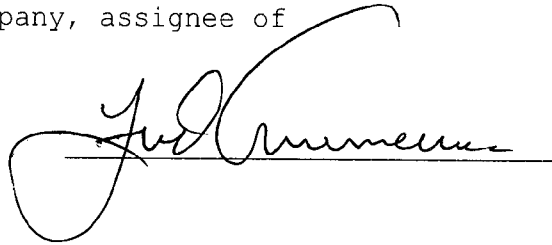
BOBBI A SHAFFER
an individual

Defendant(s),

No. 2007-418 CD

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
DECREED 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 ^{icc}
07:28/04
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

Defendant

August 10, 2007

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

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

No. 2007-418 CD

FILED *RD*

AUG 10 2007

01:30 PM

William A. Shaw
Prothonotary/Clerk of Courts

1 Clerk to
DEPT.

Response

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

JUNIPER BANK

Plaintiffs

vs.

BOBBI A. SHAFFER

Defendant

*
*
*
*
*
*

NO. 2007-418-CD

0/2: 42/KK

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ORDER

William A. Shaw
Prothonotary/Clerk of Courts KK

NOW, this 21st 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