

07-487-CD
Discover Bank vs Bobbi Coons

2007-487-CD
Discover Bank vs Bobbi Coons

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

Discover Bank
(Plaintiff)
90 David Apotheker
(Street Address)

CIVIL ACTION

No. 07-487-CD

(City, State ZIP)
Apotheker & Associates, P.C.
2417 Welsh Road
Suite 21 #520
Philadelphia, PA 19114

Type of Case: Civil

Type of Pleading: Complaint

vs.

Bobbi S. Coons
(Defendant)

Filed on Behalf of:

Discover Bank
(Plaintiff/Defendant)

321 Park Ave.
(Street Address)

Curwensville, PA 16833
(City, State ZIP)

David J. Apotheker, Esq.
(Filed by)

Apotheker & Associates, P.C.
2417 Welsh Road
Suite 21 #520
Philadelphia, PA 19114

(Address)

218-634-8920

(Phone)

(Signature)

FILED Atty pd. \$5.00

Mar 30/01
MAR 28 2007 ICC Sheriff

William A. Shaw
Prothonotary/Clerk of Courts

APOTHAKER & 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

DISCOVER BANK
c/o David J Apotheker, Esquire
2417 Welsh Road, Suite 21 #520
Philadelphia, PA 19114

110

BOBBI S COONS
321 PARK AVE
CURWENSVILLE, PA 16833-1535
Defendant

) COURT OF COMMON PLEAS
) CLEARFIELD COUNTY
)
) NO.:
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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 with twenty (20) days 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 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 ONE. 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.

CLEARFIELD COUNTY BAR ASSOCIATION
Lawyer Referral and Information Service
814-765-2641

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o con un abogado y entregar a la corte en forma escrita sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del demandante y requiere que usted compla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

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(215) 634-8920
Attorneys for Plaintiff

DISCOVER BANK) COURT OF COMMON PLEAS
c/o David J Apothaker, Esquire) CLEARFIELD COUNTY
2417 Welsh Road, Suite 21 #520)
Philadelphia, PA 19114) NO.: .
Plaintiff,)
vs.)
BOBBI S COONS)
321 PARK AVE)
CURWENSVILLE, PA 16833-1535)
Defendant.)
)

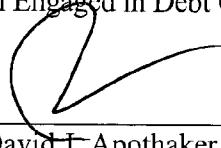
**CIVIL ACTION COMPLAINT
FIRST COUNT**

1. Plaintiff, DISCOVER BANK, 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 BOBBI S COONS, an adult individual residing at 321 PARK AVE CURWENSVILLE, PA 16833-1535.
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 \$4,763.37 from December 26, 2005.

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 \$4,763.37 plus costs, and reasonable attorney's fees.

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

BY: 

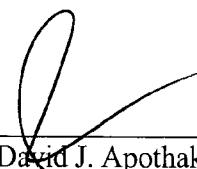
David J. Apothaker

Dated: 3/19/2007

Our File No.: 91401

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.



David J. Apothaker, Esq.
Attorney for Plaintiff

DATE: 3/19/2007

DISCOVER BANK
c/o David J Apothaker, Esquire
2417 Welsh Road, Suite 21 #520
Philadelphia, PA 19114

BOBBI S COONS
321 PARK AVE
CURWENSVILLE, PA 16833-1535

STATEMENT OF ACCOUNT

Debtor's Name: BOBBI S COONS

Account Number: 6011002210754321

Date of Debt: December 26, 2005

Balance Due: \$4,763.37

Our File No.: 91401

EXHIBIT "A"

Our File No.: 91401
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

PRAEICE 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. Apotheker

Dated: June 29, 2007

FILED No cc
7/12/2007
JUL 05 2007 Cert. of Disc.
to Atty
William A. Shaw
Notary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

COPY

Discover Bank

Vs. No. 2007-00487-CD
Bobbi S. Coons

CERTIFICATE OF DISCONTINUATION

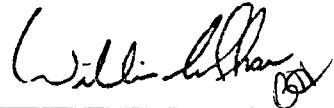
Commonwealth of PA
County of Clearfield

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 July 5, 2007, marked:

Dismissed without Prejudice

Record costs in the sum of \$85.00 have been paid in full by David J. Apotheker, Esq.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 5th day of July A.D. 2007.



William A. Shaw, Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102621
NO: 07-487-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: DISCOVER BANK

vs.

DEFENDANT: BOBBI S. COONS

FILED

06:59:51
AUG 14 2007

William A. Shaw
Prothonotary/Clerk of Courts

SHERIFF RETURN

NOW, April 20, 2007 AT 11:28 AM SERVED THE WITHIN COMPLAINT ON BOBBI S. COONS DEFENDANT AT 321 PARK AVE., CURWENSVILLE, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO DEBRA SHOPE, ADULT AT RESIDENCE A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: MORGILLO /

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	APOTHAKER	44256G	10.00
SHERIFF HAWKINS	APOTAHAKER	44256G	35.46

Sworn to Before Me This

____ Day of _____ 2007

So Answers,

*Chester A. Hawkins
by Marly Hamps*
Chester A. Hawkins
Sheriff