

07-490-CD
Discover Bank vs Laurie Hoffman

2007-490-CD
Discover Bank vs Laurie Hoffman

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

Discover Bank
(Plaintiff)
c/o David J. Apotheker
Apotheker & Associates, P.C.
2417 Welsh Road
Suite 21 #520
Philadelphia, PA 19114
(City, State ZIP)

CIVIL ACTION

No. 07-490-CD

Type of Case: Civil

Type of Pleading: Complaint

VS.

Laurie A. Hoffman
(Defendant)
611 Keewaydin Rd
(Street Address)
Frenchville, PA 16836
(City, State ZIP)

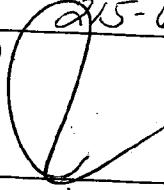
Filed on Behalf of:

Discover Bank
(Plaintiff/Defendant)

DAVID J. APOTHAKER, Esq.
(Filed by)

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

(Phone) 215-634-8920

(Signature) 

FILED
M 10:48 AM
MAR 28 2007
1CC 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 Apothaker, Esquire
2417 Welsh Road, Suite 21 #520
Philadelphia, PA 19114

Plaintiff,

vs.

) COURT OF COMMON PLEAS

) CLEARFIELD COUNTY

)

) NO.:

)

)

LAURIE A HOFFMAN

611 KEEWAYDIN RD
FRENCHVILLE, PA 16836-9206

Defendant.

)

)

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 páginas siguientes, usted tiene veinte (20) días de plazo al partir de la fecha de la demanda y la notificación. Hace falta asentir una comparecencia escrita o con un abogado y entregar a la corte en forma escrita sus objeciones a las demandas en contra de su persona. Se avisa que si usted no se defiende, la corte tomará medidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y requiere que usted cumpla 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 SUFFICIENTE 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.

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

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 Apothaker, Esquire

2417 Welsh Road, Suite 21 #520

Philadelphia, PA 19114

Plaintiff,

vs.

) COURT OF COMMON PLEAS

) CLEARFIELD COUNTY

)

) NO.:

)

)

)

LAURIE A HOFFMAN

611 KEEWAYDIN RD

FRENCHVILLE, PA 16836-9206

Defendant.

)

)

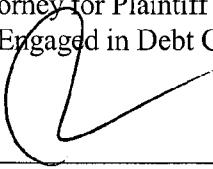
**CIVIL ACTION COMPLAINT
FIRST COUNT**

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 LAURIE A HOFFMAN, an adult individual residing at 611 KEEWAYDIN RD FRENCHVILLE, PA 16836-9206.
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 \$8,314.76 from December 18, 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 \$8,314.76 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.: 91365

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

LAURIE A HOFFMAN
611 KEEWAYDIN RD
FRENCHVILLE, PA 16836-9206

STATEMENT OF ACCOUNT

Debtor's Name: LAURIE A HOFFMAN

Account Number: 6011002710394404

Date of Debt: December 18, 2005

Balance Due: \$8,314.76

Our File No.: 91365

EXHIBIT "A"

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102627
NO: 07-490-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: DISCOVER BANK
vs.
DEFENDANT: LAURIE A. HOFFMAN

SHERIFF RETURN

NOW, April 20, 2007 AT 1:07 PM SERVED THE WITHIN COMPLAINT ON LAURIE A. HOFFMAN DEFENDANT AT 611 KEEWAYDIN ROAD, FRENCHVILLE, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO KEVIN HOFFMAN, HUSBAND A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DEHAVEN / HUNTER

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	APOTHAKER	44262G	10.00
SHERIFF HAWKINS	APOTHAKER	44262G	49.04

FILED
0/3:15 LM
AUG 15 2007 LM

Sworn to Before Me This

____ Day of _____ 2007

So Answers,

William A. Shaw
Prothonotary/Clerk of Courts

Chester A. Hawkins
by Marilyn Harry
Chester A. Hawkins
Sheriff

Our File No.: 91365
APOTHAKER & ASSOCIATES, P.C.
2417 Welsh Road, Suite 21 #520
Philadelphia, PA 19114
(215) 634-8920
Attorneys for Plaintiff
David J. Apotheker, Esquire
Attorney ID #38423

PRAECLPCE TO ENTER DEFAULT JUDGMENT

TO THE PROTHONOTARY:

Please enter a default judgment in favor of plaintiff, DISCOVER BANK and against Defendant, LAURIE A HOFFMAN, for failure to answer or otherwise respond to the Complaint - Civil Action.

The Complaint was served upon the defendants on April 20, 2007 by the CLEARFIELD Sheriff's Department. Copies of the proofs of service are attached hereto as Exhibit "A".

I certify, a copy of the Notice of Intention To Take Default was mailed on August 30, 2007, and also attached hereto.

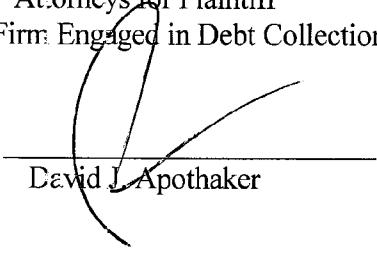
FILED Atty pd.
M/15/07 20.00
OCT 26 2007 ICC Notice
to Def.
William A. Shaw
Prothonotary/Clerk of Courts
Statement to
Atty:

Assess damages in the amount of:

(a)	Balance:	\$8,314.76
(b)	Interest from March 19, 2007	\$278.83
	TOTAL	\$8,593.59

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

By:


David J. Apothaker

Dated: 10/9/2007

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

DISCOVER BANK)	COURT OF COMMON PLEAS OF
)	CLEARFIELD COUNTY
Plaintiff,)	
vs.)	
)	
)	NO.: 47-490
LAURIE A HOFFMAN)	
)	Civil Action
Defendant.)	
)	

AFFIDAVIT OF NON-MILITARY SERVICE

COMMONWEALTH OF PENNSYLVANIA :
: SS.
COUNTY OF CLEARFIELD :
:

David J. Apothaker, being duly sworn according to law, deposes and says that I am the attorney for Plaintiff, and authorized to make this affidavit; that Defendant(s) resides at 611 KEEWAYDIN RD FRENCHVILLE, PA 16836-9206.

We inquired with the web site of the Defense Manpower Data Center, located at 1600 Wilson Boulevard, Suite 400, Arlington, VA 22209-2593, if the Defendant(s) is/are in any branch of the military.

Mary M. Snavely-Dixon, Director of the Defense Manpower Data Center has sent back our inquiry indicated that the Defendant(s) is/are not in the military.

David J. Apothaker
Attorney for Plaintiff

The above signed understands that the statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

Department of Defense Manpower Data Center

OCT-09-2007 07:42:59



Military Status Report
Pursuant to the Servicemembers Civil Relief Act

Last Name	First/Middle	Begin Date	Active Duty Status	Service/Agency
HOFFMAN	LAURIE		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.

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. §§ 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>

Our File No.: 91365
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

DISCOVER BANK)	COURT OF COMMON PLEAS
)	CLEARFIELD COUNTY
Plaintiff,)	
vs.)	
)	
)	NO. 07-490
LAURIE A HOFFMAN)	
611 KEEWAYDIN RD)	
FRENCHVILLE, PA 16836-9206)	
Defendant.)	

**NOTICE OF INTENTION
TO TAKE DEFAULT**

TO: LAURIE A HOFFMAN

DATE OF NOTICE: August 30, 2007

IMPORTANT NOTICE

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 (10) days from the date of this notice as set forth above, a judgment may be entered against you without a hearing and you may lose your property or other important rights. You should take this notice to a lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the following office to find out where you can get legal help:

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

|
S|

DAVID J. APOTHAKER, ESQUIRE
A Law Firm Engaged in Debt Collection
2417 Welsh Road, Suite 21 #520
Philadelphia, PA 19114
(215) 634-8920
Attorney for Plaintiff
Attorney ID #38423

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102627
NO: 07-490-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: DISCOVER BANK
vs.
DEFENDANT: LAURIE A. HOFFMAN

COPY

SHERIFF RETURN

NOW, April 20, 2007 AT 1:07 PM SERVED THE WITHIN COMPLAINT ON LAURIE A. HOFFMAN DEFENDANT AT 611 KEEWAYDIN ROAD, FRENCHVILLE, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO KEVIN HOFFMAN, HUSBAND A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF

SERVED BY: DEHAVEN / HUNTER

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	APOTHAKER	44262G	10.00
SHERIFF HAWKINS	APOTHAKER	44262G	49.04

Sworn to Before Me This

____ Day of 2007

So Answers.

Charles H. Smith

Chester A. Hawkins
Sheriff

**OFFICE OF THE PROTHONOTARY
COURT OF COMMON PLEAS**

COPY

TO: LAURIE A HOFFMAN
611 KEEWAYDIN RD
FRENCHVILLE, PA 16836-9206

NOTICE

Pursuant to Rule 236 of the Supreme Court of Pennsylvania, you are hereby notified that a Judgment has been entered against you in the above proceeding as indicated below.

XX JUDGMENT BY DEFAULT

JUDGMENT IN REPLEVIN

JUDGMENT BY CONFESSION

JUDGMENT FOR POSSESSION

JUDGMENT ON AWARD OF ARBITRATORS

JUDGMENT ON VERDICT

JUDGMENT ON COURT FINDINGS

JUDGMENT ON WRIT OF REVIVAL.

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE, PLEASE CALL:

ATTORNEY David J. Apotheker, Esq. at this telephone number: 215-634-8920

Williamson 10/26/07

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA
STATEMENT OF JUDGMENT

COPY

Discover Bank
Plaintiff(s)

No.: 2007-00490-CD

Real Debt: \$8,593.59

Atty's Comm: \$

Vs.

Costs: \$

Laurie A. Hoffman
Defendant(s)

Int. From: \$

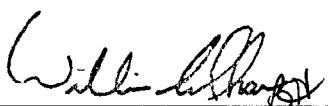
Entry: \$20.00

Instrument: Default Judgment

Date of Entry: October 26, 2007

Expires: October 26, 2012

Certified from the record this 26th day of October, 2007.



William A. Shaw, Prothonotary

SIGN BELOW FOR SATISFACTION

Received on _____, _____, of defendant full satisfaction of this Judgment,
Debt, Interest and Costs and Prothonotary is authorized to enter Satisfaction on the same.

Plaintiff/Attorney

Our File No.: 91365
APOTHAKER & ASSOCIATES, P.C.
BY: David J. Apothaker, Esquire
Attorney I.D.# 38423
520 Fellowship Road C306
Mount Laurel, NJ 08054
(800) 672-0215
Attorney for Plaintiff

4 **FILED** No. C
m 12:05pm
APR 01 2011
William A. Shaw
Prothonotary/Clerk of Courts

PRAECLipe TO MARK JUDGMENT SATISFIED

TO THE PROTHONOTARY:

Please mark the Judgment Satisfied against the Defendant. Judgment has been paid in full.

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

By: David J. Apotheker, Esquire



* Q - 9 1 3 6 5 - S A T - 1 - *