

2007-1030-CD  
Portfolio Rec vs Annette Vargas

07-1030-CD  
Portfolio Rec. vs Annette Vargas

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY  
PENNSYLVANIA

Portfolio Recovery Associates, LLC (Plaintiff) CIVIL ACTION

c/o Apotheker & Associates, P.C. No. 2007-1030-CD  
 (Street Address)  
 2417 Welsh Road, Suite 21 #520 Type of Case: Civil  
 Philadelphia, PA 19114  
 (City, State ZIP) Type of Pleading: Complaint

VS.

Annette M Vargas  
 (Defendant)  
 2162 S Main Street Ext  
 (Street Address)  
 DuBois, PA 15801  
 (City, State ZIP)

Filed on Behalf of:

Portfolio Recovery Associates, LLC  
 (Plaintiff/Defendant)

Deputy Prothonotary

Reinstated/Reissued to Sheriff/Attorney  
 Document for service

David J Apotheker, Esq.  
 (Filed by)

2417 Welsh Road, Suite 221 #520  
 (Address) Philadelphia, PA 19114

215-634-8920  
 (Phone)

(Signature)

10-14-68 Document  
 Reinstituted/Reissued to Sheriff/Attorney  
 for service.

Deputy Prothonotary

**FILED**  
 M 3:26 P.M. 6K No cc  
 JUN 28 2007 1 Complaint  
 William A. Shaw to Sheriff  
 Prothonotary/Clerk of Courts

1-12-2009 Document  
 Reinstituted/Reissued to Sheriff/Attorney  
 for service.

William A. Shaw GK  
 Deputy Prothonotary

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

PORTFOLIO RECOVERY  
ASSOCIATES, LLC  
c/o Apotheker & Associates, P.C.  
2417 Welsh Road, Suite 21 #520  
Philadelphia, PA 19114  
Plaintiff,  
vs.  
ANNETTE M VARGAS  
2162 S MAIN STREET EXT  
DU BOIS, PA 15801  
Defendant.

) COURT OF COMMON PLEAS  
 ) CLEARFIELD COUNTY  
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 ) 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 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, Esq.  
Attorney I.D.#38423  
2417 Welsh Road, Suite 21 #520  
Philadelphia, PA 19114  
(215) 634-8920  
Attorneys for Plaintiff

PORFOLIO RECOVERY  
ASSOCIATES, LLC  
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2417 Welsh Road, Suite 21 #520  
Philadelphia, PA 19114  
Plaintiff,  
vs.  
ANNETTE M VARGAS  
2162 S MAIN STREET EXT  
DU BOIS, PA 15801  
Defendant.

) COURT OF COMMON PLEAS  
 ) CLEARFIELD COUNTY  
 )  
 ) NO.:  
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**CIVIL ACTION COMPLAINT  
FIRST COUNT**

1. Plaintiff, PORTFOLIO RECOVERY ASSOCIATES, LLC, is a company with its principal place of business located at c/o Apothaker & Associates, P.C., 2417 Welsh Road, Suite 21 #520, Philadelphia, PA 19114.

2. Defendant is ANNETTE M VARGAS, an adult individual residing at 2162 S MAIN STREET  
EXT DU BOIS, PA 15801.

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 \$21,667.63.

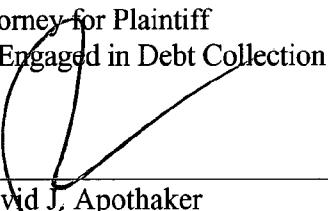
8. Although demand has been made, Defendant has failed to make payment of the amount due as above.

9. The original creditor is WASHINGTON MUTUAL BANK.

WHEREFORE, Plaintiff demands judgment in favor of Plaintiff and against Defendant(s) for the sum of \$21,667.63 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: June 18, 2007

Our File No.: 86271

VERIFICATION

Tina L. Lantz, hereby states that I am a Legal Specialist for Plaintiff in this action, and I am authorized to make 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.

Tina L. Lantz

Dated:

PORFOLIO RECOVERY ASSOCIATES, LLC  
c/o Apothaker & Associates, P.C.  
2417 Welsh Road, Suite 21 #520  
Philadelphia, PA 19114

ANNETTE M VARGAS  
2162 S MAIN STREET EXT  
DU BOIS, PA 15801

**STATEMENT OF ACCOUNT**

Debtor's Name: ANNETTE M VARGAS  
Account Number: 4465685000099356  
Original Creditor: WASHINGTON MUTUAL BANK  
Date of Debt: October 11, 2005  
Balance Due: \$21,667.63

Our File No.: 86271

**EXHIBIT "A"**

**In The Court of Common Pleas of Clearfield County, Pennsylvania**

Service # 1 of 1 Services

Sheriff Docket #

**102956**

**PORTFOLIO RECOVERY ASSOCIATES, LLC**

Case # 07-1030-CD

vs.

**ANNETTE M. VARGAS**

**FILED**

09/00/07  
NOV 13 2007

William A. Shaw  
Prothonotary/Clerk of Courts

TYPE OF SERVICE COMPLAINT

**SHERIFF RETURNS**

NOW November 09, 2007 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT "NOT FOUND" AS TO ANNETTE M. VARGAS, DEFENDANT. SEVERAL ATTEMPTS.

SERVED BY: /

**Return Costs**

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	APOTHAKER	51069G	10.00
SHERIFF HAWKINS	APOTHAKER	51069G	69.29

Sworn to Before me This

So Answers,

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

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

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY  
PENNSYLVANIA

Portfolio Recovery Associates, LLC (Plaintiff) CIVIL ACTION

c/o Apothaker & Associates, P.C. No. 2007-1030-CD  
(Street Address)  
 2417 Welsh Road, Suite 21 #520 Type of Case: Civil  
 Philadelphia, PA 19114

(City, State ZIP)

Type of Pleading: Complaint

VS.

Annette M Vargas (Defendant)

2162 S Main Street Ext  
(Street Address)  
 DuBois, PA 15801  
(City, State ZIP)

Filed on Behalf of:

Portfolio Recovery Associates, LLC  
(Plaintiff/Defendant)

David J Apothaker, Esq.  
(Filed by)

2417 Welsh Road, Suite 21 #520  
(Address) Philadelphia, PA 19114

215-634-8920  
(Phone)

(Signature)

I hereby certify this to be a true  
 and attested copy of the original  
 statement filed in this case.

JUN 28 2007

Attest.

*William J. Apothaker*  
 Prothonotary/  
 Clerk of Courts

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

---

PORTFOLIO RECOVERY ) COURT OF COMMON PLEAS  
ASSOCIATES, LLC ) CLEARFIELD COUNTY  
c/o Apothaker & Associates, P.C. )  
2417 Welsh Road, Suite 21 #520 ) NO.:  
Philadelphia, PA 19114 )  
Plaintiff, )  
vs. )  
ANNETTE M VARGAS )  
2162 S MAIN STREET EXT )  
DU BOIS, PA 15801 )  
Defendant. )

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NOTICE

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

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

---

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c/o Apothaker & Associates, P.C. )  
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Philadelphia, PA 19114 )  
Plaintiff, )  
vs. )  
ANNETTE M VARGAS )  
2162 S MAIN STREET EXT )  
DU BOIS, PA 15801 )  
Defendant. )

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FIRST COUNT**

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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 \$21,667.63.

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

9. The original creditor is WASHINGTON MUTUAL BANK.

WHEREFORE, Plaintiff demands judgment in favor of Plaintiff and against Defendant(s) for the sum of \$21,667.63 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: June 18, 2007

Our File No.: 86271

VERIFICATION

Tina L. Lantz, hereby states that I am a Legal Specialist for Plaintiff in this action, and I am authorized to make 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.

Tina L. Lantz

Dated:

PORTFOLIO RECOVERY ASSOCIATES, LLC  
c/o Apotheker & Associates, P.C.  
2417 Welsh Road, Suite 21 #520  
Philadelphia, PA 19114

ANNETTE M VARGAS  
2162 S MAIN STREET EXT  
DU BOIS, PA 15801

STATEMENT OF ACCOUNT

Debtor's Name: ANNETTE M VARGAS  
Account Number: 4465685000099356  
Original Creditor: WASHINGTON MUTUAL BANK  
Date of Debt: October 11, 2005  
Balance Due: \$21,667.63

Our File No.: 86271

EXHIBIT "A"

Our File No.: 86271  
BY: David J. Apothaker, Esq.  
APOTHAKER & ASSOCIATES, P.C.  
Attorney I.D.#38423  
2417 Welsh Road, Suite 21 #520  
Philadelphia, PA 19114  
(215) 634-8920  
Attorney for Plaintiff

U/A  
FILED <sup>rec</sup>  
M 10:48 AM Atty  
MAR 06 2008 Apothaker  
GR

William A. Shaw  
Prothonotary/Clerk of Courts

PORFTOLIO RECOVERY ) COURT OF COMMON PLEAS OF  
ASSOCIATES, LLC ) CLEARFIELD COUNTY  
C/O David J. Apothaker, Esq. )  
2417 Welsh Rd., Ste. 520 #21 ) NO.: 2007-1030-CD  
Philadelphia, PA 19114 )  
Plaintiff, ) Civil Action  
vs. )  
ANNETTE M VARGAS )  
2162 S MAIN STREET EXT )  
DU BOIS, PA 15801 )  
Defendant. )

**MOTION FOR ALTERNATIVE SERVICE**

Pursuant to Pa. R.C.P. 430(a) and Pa. R.C.P. 410(c)(2), Plaintiff, by and through its attorneys, requests that this Honorable Court grant an **ORDER** permitting service of the Complaint upon the Defendant(s) by posting the Complaint on the most public part of the property located at 2162 S MAIN STREET EXT DU BOIS, PA 15801, and by serving it by certified and regular mail at 2162 S MAIN STREET EXT DU BOIS, PA 15801 and in support therefore, presents the attached Affidavit.

APOTHAKER & ASSOCIATES, P.C.  
Attorneys for Plaintiff

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

David J. Apothaker, Esq.  
Attorney for Plaintiff

Dated: 3/3/2008

Our File No.: 86271  
BY: David J. Apothaker, Esq.  
APOTHAKER & ASSOCIATES, P.C.  
Attorney I.D.#38423  
2417 Welsh Road, Suite 21 #520  
Philadelphia, PA 19114  
(215) 634-8920  
Attorney for Plaintiff

PORTFOLIO RECOVERY ) COURT OF COMMON PLEAS OF  
ASSOCIATES, LLC ) CLEARFIELD COUNTY  
C/O David J. Apothaker, Esq. )  
2417 Welsh Rd., Ste. 520 #21 ) NO.: 2007-1030-CD  
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Plaintiff, ) Civil Action  
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2162 S MAIN STREET EXT )  
DU BOIS, PA 15801 )  
Defendant. )

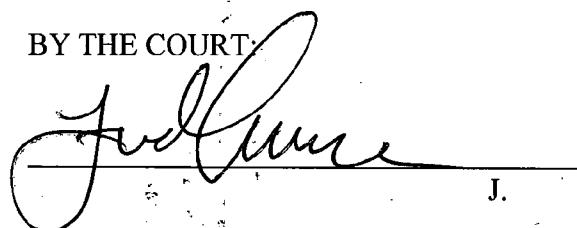
**ORDER FOR ALTERNATE SERVICE OF PROCESS**

AND NOW, this 7<sup>th</sup> day of March, 2008 it is

**ORDERED** that plaintiff's Petition for Alternative Service of Process, pursuant to Pa.R.C.P. 430

(a) and Pa.R.C.P. 410(c)(2) is Granted/Denied, permitting service by Posting the Complaint on  
the most public part of the property located at 2162 S MAIN STREET EXT DU BOIS, PA  
15801 and by serving it by certified and regular mail at 2162 S MAIN STREET EXT DU BOIS,  
PA 15801.

BY THE COURT:



J.

FILED

04/00/08  
MAR 07 2008

ICC  
Atty Apothaker  
(GR)

William A. Shaw  
Prothonotary/Clerk of Courts

**FILED**  
**MAR 07 2008**

William A. Shaw  
Prothonotary/Clerk of Courts

DATE: 3/7/08

You are responsible for serving all appropriate parties.

The Prothonotary's Office has provided service to the following parties:

Plaintiff(s)  Plaintiff(s) Attorney  Other

Defendant(s)  Defendant(s) Attorney

Special Instructions:

Our File No.: 86271  
BY: David J. Apothaker, Esq.  
APOTHAKER & ASSOCIATES, P.C.  
Attorney I.D.#38423  
2417 Welsh Road, Suite 21 #520  
Philadelphia, PA 19114  
(215) 634-8920  
Attorney for Plaintiff

PORFTOLIO RECOVERY ) COURT OF COMMON PLEAS OF  
ASSOCIATES, LLC ) CLEARFIELD COUNTY  
C/O David J. Apothaker, Esq. )  
2417 Welsh Rd., Ste. 520 #21 ) NO.: 2007-1030-CD  
Philadelphia, PA 19114 )  
Plaintiff, ) Civil Action  
vs. )  
ANNETTE M VARGAS )  
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DU BOIS, PA 15801 )  
Defendant. )

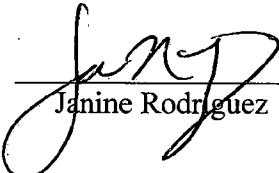
#### AFFIDAVIT OF SERVICE

I, Janine Rodriguez, of full age, depose and say that I am a legal assistant at Apothaker & Associates, P.C., and that on this day I did mail to ANNETTE M VARGAS at 2162 S MAIN STREET EXT DU BOIS, PA 15801, by regular mail, a copy of a Motion for Alternative Service, Affidavit in Support of Motion, Proposed Order and Affidavit of Service.

I understand that the statements herein are made subject to the penalties of 18 Pa. C.S.A. §4904 relating to unsworn falsification to authorities.

APOTHAKER & ASSOCIATES, P.C.  
Attorneys for Plaintiff

By:



Janine Rodriguez

Dated: 3/3/2008

Our File No.: 86271  
BY: David J. Apothaker, Esq.  
APOTHAKER & ASSOCIATES, P.C.  
Attorney I.D.#38423  
2417 Welsh Road, Suite 21 #520  
Philadelphia, PA 19114  
(215) 634-8920  
Attorney for Plaintiff

PORFOLIO RECOVERY ) COURT OF COMMON PLEAS OF  
ASSOCIATES, LLC ) CLEARFIELD COUNTY  
C/O David J. Apothaker, Esq. )  
2417 Welsh Rd., Ste. 520 #21 ) NO.: 2007-1030-CD  
Philadelphia, PA 19114 )  
Plaintiff, ) Civil Action  
vs. )  
ANNETTE M VARGAS )  
2162 S MAIN STREET EXT )  
DU BOIS, PA 15801 )  
Defendant. )

### AFFIDAVIT

I, David J. Apothaker, Esquire, attorney for Plaintiff in the above-captioned matter, do hereby aver to the best of my knowledge, information and belief, the following:

1. Plaintiff brings this action to collect monies due on a credit card account.
2. The Sheriff of CLEARFIELD County was unable to serve the Complaint upon Defendant at his/her residence at 2162 S MAIN STREET EXT DU BOIS, PA 15801 because:

- NO ANSWER

Attached hereto as Exhibit "A" is a true and correct copy of the CLEARFIELD County Sheriff's Return of Service.

3. I have made an investigation to determine the whereabouts of the defendant and confirm 2162 S MAIN STREET EXT DU BOIS, PA 15801 as Defendant's address. This investigation included the following:

a. Attached hereto as Exhibit "B" is a true and correct copy of a record that the defendant owns the property located at 2162 S MAIN STREET EXT DU BOIS, PA 15801.

4. This investigation confirms that the address that the Sheriff of CLEARFIELD County attempted to serve the defendant at 2162 S MAIN STREET EXT DU BOIS, PA 15801, the address where defendant is located.

APOTHAKER & ASSOCIATES, P.C.  
Attorneys for Plaintiff  
By: \_\_\_\_\_  
David J. Apothaker, Esq.

Dated: March 3, 2008

**In The Court of Common Pleas of Clearfield County, Pennsylvania**

**PORTFOLIO RECOVERY ASSOCIATES, LLC**

Service # 1 of 1 Services

**Sheriff Docket # 102956**

**Case # 07-1030-CD**

VS.

**ANNETTE M. VARGAS**

**COPY**

**TYPE OF SERVICE COMPLAINT**

**SHERIFF RETURNS**

**NOW November 09, 2007 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN 'COMPLAINT' "NOT FOUND" AS TO ANNETTE M. VARGAS, DEFENDANT, SEVERAL ATTEMPTS.**

**SERVED BY: /**

**Return Costs**

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	APOTHAKER	51069G	10.00
SHERIFF HAWKINS	APOTHAKER	51069G	69.29

**Sworn to Before me This**

**So Answers,**

**Day of 2007**



**Chester A. Hawkins  
Sheriff**

**Important:**

The Public Records and commercially available data sources used on reports have errors. Data is sometimes entered poorly, processed incorrectly and is generally not free from defect. This system should not be relied upon as definitively accurate. Before relying on any data this system supplies, it should be independently verified. For Secretary of State documents, the following data is for information purposes only and is not an official record. Certified copies may be obtained from that individual state's Department of State.

**'We Also Found**

**We Also Found**

**Date:** 11/23/07

**Subject Information:** ANNETTE M VARGAS

**Properties:**

**Property:**

Parcel Number - E05-000-002.3

Owner Name 1 - VARGAS, ANNETTE M

Address - 2162 S MAIN STREET EXT, DL BCIS PA 15801-5342, CLEARFIELD COUNTY

Owner's Address - 2162 S MAIN STREET EXT DL EOIS PA 15801-5342, CLEARFIELD COUNTY

Land Usage - SINGLE FAMILY RESIDENTIAL

Land Size - 42689 SF

Sale Price - \$90,000

Legal Description - H & 0.93 A SURF.

Data Source - B

Our File No.: 86271  
APOTHAKER & ASSOCIATES, P.C.  
BY: David J. Apothaker  
Attorney I.D.# 38423  
520 Fellowship Road C306  
Mount Laurel, NJ 08054  
(800) 672-0215  
Attorney for Plaintiff

'FILED

OCT 14 2008

REINSTATEMENT

William A. Shaw  
Prothonotary/Clerk of Courts

I CERT W/

REINSTATEMENT

COMPLAINT

TO ATT

PORTFOLIO RECOVERY ) COURT OF COMMON PLEAS  
ASSOCIATES, LLC ) CLEARFIELD COUNTY  
Plaintiff, )  
vs. )  
ANNETTE M VARGAS )  
Defendant. ) NO.: 2007-1030-CD

PRAECIPE TO  
REINSTATE COMPLAINT - CIVIL ACTION

TO THE PROTHONOTARY:

Kindly reinstate the Complaint in the above captioned Civil Action for an additional thirty (30) days.

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

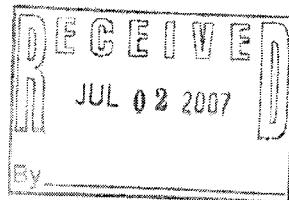
BY:

David J. Apothaker, Esquire

Dated: 9/30/2008

86271-7

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY  
PENNSYLVANIA



Portfolio Recovery Associates, LLC CIVIL ACTION  
(Plaintiff)

c/o Apothaker & Associates, P.C. No. 2007-1030-CD  
(Street Address)  
2417 Welsh Road, Suite 21 #520 Type of Case: Civil  
Philadelphia, PA 19114  
(City, State ZIP) Type of Pleading: Complaint

VS.

Annette M Vargas  
(Defendant)  
  
2162 S Main Street Ext  
(Street Address)  
DuBois, PA 15801  
(City, State ZIP)

Filed on Behalf of:

Portfolio Recovery Associates, LLC  
(Plaintiff/Defendant)

David J Apothaker, Esq.  
(Filed by)

2417 Welsh Road, Suite 21 #520  
(Address) Philadelphia, PA 19114

215-634-8920  
(Phone)

(Signature)

**COPIES**  
**FILED**  
3:06 PM  
JUN 28 2007

William A. Shaw  
Prothonotary/Clerk of Courts

APOTHAKER & ASSOCIATES, P.C.

BY: David J. Apothaker, Esq.

Attorney I.D.#38423

2417 Welsh Road, Suite 21 #520

Philadelphia, PA 19114

(215) 634-8920

Attorneys for Plaintiff

---

PORTFOLIO RECOVERY	)	COURT OF COMMON PLEAS
ASSOCIATES, LLC	)	CLEARFIELD COUNTY
c/o Apothaker & Associates, P.C.	)	
2417 Welsh Road, Suite 21 #520	)	NO.: 2007-1030-CD
Philadelphia, PA 19114	)	
Plaintiff,	)	
vs.	)	
ANNETTE M VARGAS	)	
2162 S MAIN STREET EXT	)	
DU BOIS, PA 15801	)	
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. Sea avisado 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.

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Philadelphia, PA 19114

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Attorneys for Plaintiff

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PORFTOLIO RECOVERY	)	COURT OF COMMON PLEAS
ASSOCIATES, LLC	)	CLEARFIELD COUNTY
c/o Apothaker & Associates, P.C.	)	
2417 Welsh Road, Suite 21 #520	)	NO.:
Philadelphia, PA 19114	)	
Plaintiff,	)	
vs.	)	
ANNETTE M VARGAS	)	
2162 S MAIN STREET EXT	)	
DU BOIS, PA 15801	)	
Defendant.	)	

---

**CIVIL ACTION COMPLAINT  
FIRST COUNT**

1. Plaintiff, PORTFOLIO RECOVERY ASSOCIATES, LLC, is a company with its principal place of business located at c/o Apothaker & Associates, P.C., 2417 Welsh Road, Suite 21 #520, Philadelphia, PA 19114.

2. Defendant is ANNETTE M VARGAS, an adult individual residing at 2162 S MAIN STREET EXT DU BOIS, PA 15801.

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 \$21,667.63.

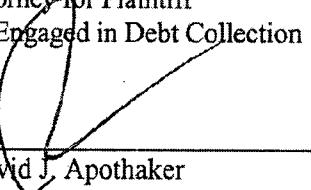
8. Although demand has been made, Defendant has failed to make payment of the amount due as above.

9. The original creditor is WASHINGTON MUTUAL BANK.

WHEREFORE, Plaintiff demands judgment in favor of Plaintiff and against Defendant(s) for the sum of \$21,667.63 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: June 18, 2007

Our File No.: 86271

VERIFICATION

Tina L. Lantz, hereby states that I am a Legal Specialist for Plaintiff in this action, and I am authorized to make 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.

Tina L. Lantz

Dated:

PORFOLIO RECOVERY ASSOCIATES, LLC  
c/o Apothaker & Associates, P.C.  
2417 Welsh Road, Suite 21 #520  
Philadelphia, PA 19114

ANNETTE M VARGAS  
2162 S MAIN STREET EXT  
DU BOIS, PA 15801

STATEMENT OF ACCOUNT

Debtor's Name: ANNETTE M VARGAS  
Account Number: 4465685000099356  
Original Creditor: WASHINGTON MUTUAL BANK  
Date of Debt: October 11, 2005  
Balance Due: \$21,667.63

Our File No.: 86271

EXHIBIT "A"

**FILED**  
OCT 14 2008  
William A. Shear  
Probationary Clerk of Courts

**In The Court of Common Pleas of Clearfield County, Pennsylvania**

Service # 1 of 1 Services

Sheriff Docket #

**104877**

PORFOLIO RCOVERY ASSOCIATES, LLC

Case #

07-1030-CD

vs.

ANNETTE M. VARGAS

TYPE OF SERVICE COMPLAINT & ORDER

**SHERIFF RETURNS**

NOW November 18, 2008 RETURNED THE WITHIN COMPLAINT & ORDER "NOT SERVED, TIME EXPIRED" AS TO ANNETTE M. VARGAS, DEFENDANT. NO ATTEMPTS

SERVED BY: /

**Return Costs**

PURPOSE	VENDOR	CHECK #	AMOUNT
	NO COSTS		

5 **FILED**  
01/10/02 8:21  
NOV 20 2008  
WAM  
William A. Shaw  
Prothonotary/Clerk of Courts

Sworn to Before me This

\_\_\_\_ Day of \_\_\_\_\_ 2008  
\_\_\_\_\_  
\_\_\_\_\_

So Answers,

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

Our File No.: 86271  
BY: David J. Apotheker, Esq.  
APOTHEKER & ASSOCIATES, P.C.  
Attorney I.D.#38423  
2417 Welsh Road, Suite 21 #520  
Philadelphia, PA 19114  
(215) 634-8920  
Attorney for Plaintiff

---

PORFOLIO RECOVERY ASSOCIATES, LLC C/O David J. Apotheker, Esq. 2417 Welsh Rd., Ste. 520 #21 Philadelphia, PA 19114	)	COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
Plaintiff,	)	NO.: 2007-1030-CD
vs.	)	Civil Action
ANNETTE M VARGAS 2162 S MAIN STREET EXT DU BOIS, PA 15801	)	
Defendant.	)	

---

**ORDER FOR ALTERNATE SERVICE OF PROCESS**

AND NOW, this 7<sup>th</sup> day of March, 2008 it is  
**ORDERED** that plaintiff's Petition for Alternative Service of Process, pursuant to Pa.R.C.P. 430  
(a) and Pa.R.C.P. 410(c)(2) is **Granted/Denied**, permitting service by Posting the Complaint on  
the most public part of the property located at 2162 S MAIN STREET EXT DU BOIS, PA  
15801 and by serving it by certified and regular mail at 2162 S MAIN STREET EXT DU BOIS,  
PA 15801.

BY THE COURT:

---

/S/ Fredric J Ammerman

J.

herby certify this to be a true  
and attested copy of the original  
statement filed in this case.

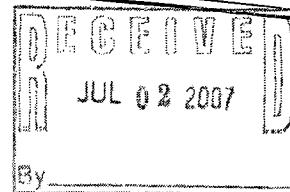
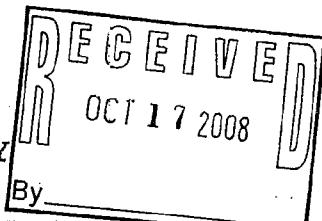
MAR 07 2008

Attest.

*William J. Ammerman*  
Prothonotary/  
Clerk of Court

86271

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY  
PENNSYLVANIA



Portfolio Recovery Associates, LLC (Plaintiff)

c/o Apotheker & Associates, P.C. No. 2007-1030-CD  
(Street Address)  
2417 Welsh Road, Suite 21 #520 Type of Case: Civil  
Philadelphia, PA 19114

(City, State ZIP)

Type of Pleading: Complaint

VS.

Annette M Vargas  
(Defendant)  
2162 S Main Street Ext  
(Street Address)  
DuBois, PA 15801  
(City, State ZIP)

Filed on Behalf of:

Portfolio Recovery Associates, LLC  
(Plaintiff/Defendant)

I hereby certify this to be true and  
attested copy of the original  
statement filed in this case.

OCT 14 2008

Attest

*William A. Shaw*  
Prothonotary/  
Clerk of Courts

David J Apotheker, Esq.  
(Filed by)

2417 Welsh Road, Suite 21 #520  
(Address) Philadelphia, PA 19114

215-634-8920  
(Phone)

(Signature)

*Oct. 14, 2008* Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.

*WA*  
Deputy Prothonotary

**COPY  
FILED**  
3:26 p.m.  
JUN 28 2007

William A. Shaw  
Prothonotary/Clerk of Courts

APOTHAKER & ASSOCIATES, P.C.

BY: David J. Apothaker, Esq.

Attorney I.D.#38423

2417 Welsh Road, Suite 21 #520

Philadelphia, PA 19114

(215) 634-8920

Attorneys for Plaintiff

---

PORTFOLIO RECOVERY

ASSOCIATES, LLC

c/o Apothaker & Associates, P.C.

2417 Welsh Road, Suite 21 #520

Philadelphia, PA 19114

Plaintiff,

vs.

ANNETTE M VARGAS

2162 S MAIN STREET EXT

DU BOIS, PA 15801

Defendant.

) COURT OF COMMON PLEAS

) CLEARFIELD COUNTY

)

) NO.: 2007-1030-CD

)

)

)

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

### **AVISO**

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814-765-2641

APOTHAKER & ASSOCIATES, P.C.

BY: David J. Apothaker, Esq.

Attorney I.D.#38423

2417 Welsh Road, Suite 21 #520

Philadelphia, PA 19114

(215) 634-8920

Attorneys for Plaintiff

PORFOLIO RECOVERY	)	COURT OF COMMON PLEAS
ASSOCIATES, LLC	)	CLEARFIELD COUNTY
c/o Apothaker & Associates, P.C.	)	)
2417 Welsh Road, Suite 21 #520	)	NO.:
Philadelphia, PA 19114	)	)
Plaintiff,	)	)
vs.	)	)
ANNETTE M VARGAS	)	)
2162 S MAIN STREET EXT	)	)
DU BOIS, PA 15801	)	)
Defendant.	)	)

**CIVIL ACTION COMPLAINT  
FIRST COUNT**

1. Plaintiff, PORTFOLIO RECOVERY ASSOCIATES, LLC, is a company with its principal place of business located at c/o Apothaker & Associates, P.C., 2417 Welsh Road, Suite 21 #520, Philadelphia, PA 19114.

2. Defendant is ANNETTE M VARGAS, an adult individual residing at 2162 S MAIN STREET EXT DU BOIS, PA 15801.

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 \$21,667.63.

APOTHAKER & ASSOCIATES, P.C.

BY: David J. Apothaker, Esq.

Attorney I.D.#38423

2417 Welsh Road, Suite 21 #520

Philadelphia, PA 19114

(215) 634-8920

Attorneys for Plaintiff

---

PORFOLIO RECOVERY

ASSOCIATES, LLC

c/o Apothaker & Associates, P.C.

2417 Welsh Road, Suite 21 #520

Philadelphia, PA 19114

Plaintiff,

vs.

ANNETTE M VARGAS

2162 S MAIN STREET EXT

DU BOIS, PA 15801

Defendant.

) COURT OF COMMON PLEAS

) CLEARFIELD COUNTY

)

) NO.:

)

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)

)

)

)

#### **CIVIL ACTION COMPLAINT FIRST COUNT**

1. Plaintiff, PORTFOLIO RECOVERY ASSOCIATES, LLC, is a company with its principal place of business located at c/o Apothaker & Associates, P.C., 2417 Welsh Road, Suite 21 #520, Philadelphia, PA 19114.

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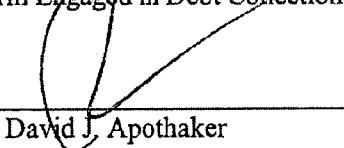
7. In addition, Plaintiff avers that Defendant has failed and continues to fail to make any payments, leaving a balance due and owing of \$21,667.63.

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

9. The original creditor is WASHINGTON MUTUAL BANK.

WHEREFORE, Plaintiff demands judgment in favor of Plaintiff and against Defendant(s) for the sum of \$21,667.63 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: June 18, 2007

Our File No.: 86271

VERIFICATION

Tina L. Lantz, hereby states that I am a Legal Specialist for Plaintiff in this action, and I am authorized to make 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.

Tina L. Lantz

Dated:

PORTFOLIO RECOVERY ASSOCIATES, LLC  
c/o Apotheker & Associates, P.C.  
2417 Welsh Road, Suite 21 #520  
Philadelphia, PA 19114

ANNETTE M VARGAS  
2162 S MAIN STREET EXT  
DU BOIS, PA 15801

STATEMENT OF ACCOUNT

Debtor's Name: ANNETTE M VARGAS  
Account Number: 4465685000099356  
Original Creditor: WASHINGTON MUTUAL BANK  
Date of Debt: October 11, 2005  
Balance Due: \$21,667.63

Our File No.: 86271

EXHIBIT "A"

**FILED**

**NOV 20 2008**

**William A. Shaw**  
**Prothonotary/Clerk of Courts**

Our File No.: 86271  
APOTHAKER & ASSOCIATES, P.C.  
BY: David J. Apothaker  
Attorney I.D.# 38423  
520 Fellowship Road C306  
Mount Laurel, NJ 08054  
(800) 672-0215  
Attorney for Plaintiff

---

PORFTOLIO RECOVERY ) COURT OF COMMON PLEAS  
ASSOCIATES, LLC ) CLEARFIELD COUNTY  
Plaintiff, )  
vs. )  
ANNETTE M VARGAS ) NO.: 2007-1030-CD  
Defendant. )

---

PRAECIPE TO  
REINSTATE COMPLAINT - CIVIL ACTION

TO THE PROTHONOTARY:

Kindly reinstate the Complaint in the above captioned Civil Action for an additional thirty (30) days.

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

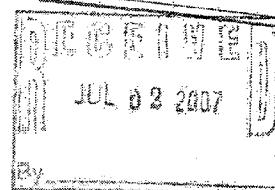
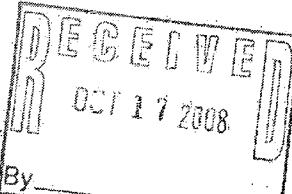
BY: \_\_\_\_\_  
David J. Apothaker, Esquire

Dated: 12/23/2008

FILED (G1)  
M 11:15 AM JAN 12 2009 7:00  
JAN 12 2009 Atty pd.  
William A. Shaw  
Prothonotary/Clerk of Courts  
ICCA Comp.  
Reinstated  
to Atty  
S

86271

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY  
PENNSYLVANIA



Portfolio Recovery Associates, LLC (Plaintiff) CIVIL ACTION

c/o Apotheker & Associates, P.C. No. 2007-1030-CD

(Street Address)  
2417 Welsh Road, Suite 21 #520  
Philadelphia, PA 19114 Type of Case: Civil

(City, State ZIP) Type of Pleading: Complaint

vs.

Annette M Vargas  
(Defendant)

2162 S Main Street Ext  
(Street Address)

DuBois, PA 15801

(City, State ZIP)

Filed on Behalf of:

Portfolio Recovery Associates, LLC  
(Plaintiff/Defendant)

I hereby certify this to be true and  
attested copy of the original  
statement filed in this case.

OCT 14 2008

Attest

*William A. Shaw*  
Prothonotary/  
Clerk of Courts

David J Apotheker, Esq.  
(Filed by)

2417 Welsh Road, Suite 21 #520  
(Address) Philadelphia, PA 19114

215-634-8920  
(Phone)

(Signature)

Oct. 14, 2008 Document  
Reinstated/Received to Sheriff/Attorney  
for service.

William A. Shaw  
Deputy Prothonotary

**COPY FILED**  
3:26 PM  
JUN 28 2007

William A. Shaw  
Prothonotary/Clerk of Courts

APOTHAKER & ASSOCIATES, P.C.

BY: David J. Apothaker, Esq.

Attorney I.D.#38423

2417 Welsh Road, Suite 21 #520

Philadelphia, PA 19114

(215) 634-8920

Attorneys for Plaintiff

PORTFOLIO RECOVERY  
ASSOCIATES, LLC  
c/o Apothaker & Associates, P.C.  
2417 Welsh Road, Suite 21 #520  
Philadelphia, PA 19114

Plaintiff,

vs.

ANNETTE M VARGAS  
2162 S MAIN STREET EXT  
DU BOIS, PA 15801

Defendant.

) COURT OF COMMON PLEAS  
) CLEARFIELD COUNTY  
)  
) NO.: 2007-1030-CD  
)  
)  
vs.  
)  
)  
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)  
Defendant. )

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

**PORTFOLIO RECOVERY  
ASSOCIATES, LLC**  
c/o Apotheker & Associates, P.C.  
2417 Welsh Road, Suite 21 #520  
Philadelphia, PA 19114

vs.

ANNETTE M VARGAS  
2162 S MAIN STREET EXT  
DU BOIS, PA 15801

**Defendant:**

) COURT OF COMMON PLEAS  
)) CLEARFIELD COUNTY  
))  
)) NO.: 100-0000000

**CIVIL ACTION COMPLAINT  
FIRST COUNT**

1. Plaintiff, PORTFOLIO RECOVERY ASSOCIATES, LLC, is a company with its principal place of business located at c/o Apotheker & Associates, P.C., 2417 Welsh Road, Suite 21 #520, Philadelphia, PA 19114.
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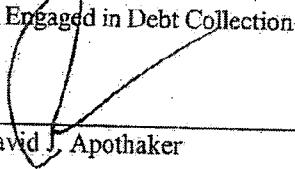
8. Although demand has been made, Defendant has failed to make payment of the amount due as above.

9. The original creditor is WASHINGTON MUTUAL BANK.

WHEREFORE, Plaintiff demands judgment in favor of Plaintiff and against Defendant(s) for the sum of \$21,667.63 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: June 18, 2007

Our File No.: 86271

**VERIFICATION**

Tina L. Lantz, hereby states that I am a Legal Specialist for Plaintiff in this action, and I am authorized to make 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.

Dated:

Tina L. Lantz

PORFOLIO RECOVERY ASSOCIATES, LLC  
c/o Apotheker & Associates, P.C.  
2417 Welsh Road, Suite 21 #520  
Philadelphia, PA 19114

ANNETTE M VARGAS  
2162 S MAIN STREET EXT  
DU BOIS, PA 15801

STATEMENT OF ACCOUNT

Debtor's Name: ANNETTE M VARGAS

Account Number: 4465685000099356

Original Creditor: WASHINGTON MUTUAL BANK

Date of Debt: October 11, 2005

Balance Due: \$21,667.63

Our File No.: 86271

EXHIBIT "A"

**FILED**

JAN 12 2009

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
NO: 07-1030-CD

PORTFOLIO RECOVERY ASSOCIATES, LLC  
vs  
ANNETTE M. VARGAS

SERVICE # 1 OF 1

PRAECLPICE & COMPLAINT & ORDER

SERVE BY: 02/11/2009 HEARING: PAGE: 105163

S FILED

DEFENDANT: ANNETTE M. VARGAS  
ADDRESS: 2162 S. MAIN ST. EXT.  
DUBOIS, PA 15801

JAN 22 2009

6/3/30/09

William A. Shaw

Prothonotary/Clerk of Courts

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: POST ON PROPERTY

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT OCCUPIED

ATTEMPTS

SHERIFF'S RETURN

NOW, 1-21-2009 AT 1:17 AM  PM SERVED THE WITHIN

PRAECLPICE & COMPLAINT & ORDER ON ANNETTE M. VARGAS, DEFENDANT

BY HANDING TO \_\_\_\_\_

A TRUE AND ATTESTED COPY OF THE ORIGINAL DOCUMENT AND MADE KNOW TO HIM / HER THE CONTENTS THEREOF.

ADDRESS SERVED \_\_\_\_\_

NOW 1-21-2009 AT 1:17 AM  PM POSTED THE WITHIN

PRAECLPICE & COMPLAINT & ORDER FOR ANNETTE M. VARGAS

AT (ADDRESS) 2162 South Main ST. Extension. DuBois, PA 15801

NOW \_\_\_\_\_ AT \_\_\_\_\_ AM / PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF **NOT FOUND** AS TO ANNETTE M. VARGAS

REASON UNABLE TO LOCATE \_\_\_\_\_

SWORN TO BEFORE ME THIS

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

Jerome M. Nerville  
Deputy Signature

Jerome M. Nerville  
Print Deputy Name

DAY OF 2009

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 105163  
NO: 07-1030-CD  
SERVICES 1  
PRAECLPCE & COMPLAINT & ORDER

PLAINTIFF: PORTFOLIO RECOVERY ASSOCIATES, LLC  
vs.  
DEFENDANT: ANNETTE M. VARGAS

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	APOTHAKER	116720	10.00
SHERIFF HAWKINS	APOTHAKER	116720	29.90

S FILED  
013:30pm  
JUN - 3 2009  
William A. Shaw  
Prothonotary/Clerk of Courts

Sworn to Before Me This

So Answers,

\_\_\_\_ Day of \_\_\_\_\_ 2009



Chester A. Hawkins  
Sheriff

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

Porfolio Recovery Associates :  
Plaintiff : Jury Trial Demanded  
Annette Vargas :  
Defendant :  
: 2007-1030

**ANSWER**

1. Defendant believes and avers that Plaintiff is not the real party in interest.
2. Defendant believes and avers that the claim may be outside of the statute of limitations.
3. Defendant believes and avers that the account is overstated.

Wherefore, Defendant prays that no judgment will be granted against her without a hearing first.

*Annette Vargas* 7/7/09  
Annette Vargas Date

FILED *no ce*  
3112:53 AM  
JUL 09 2009  
S *60*  
William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

Porfolio Recovery Associates	:	
	Plaintiff	Jury Trial Demanded
Annette Vargas	:	
	Defendant	
	:	2007-1030

**CERTIFICATE OF SERVICE**

On the 7<sup>th</sup> day of July, 2009, I sent a true and correct copy of the attached answer to the following parties at the following addresses.

Apothaker & Associates, P.C.  
520 Fellowship Road  
Mount Laurel, NJ 08054

*Annette Vargas* 7/7/09  
Annette Vargas Date

FILED

JUL 09 2009

William A. Shaw  
Prothonotary/Clerk of Courts

Our File No.: 86271  
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

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PORFTOLIO RECOVERY ) COURT OF COMMON PLEAS  
ASSOCIATES, LLC ) CLEARFIELD COUNTY  
vs. )  
Plaintiff, )  
vs. )  
ANNETTE M VARGAS ) NO. 2007-1030-CD  
vs. )  
Defendant. )

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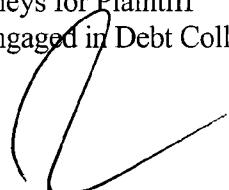
5 FILED 1CC R/Hy  
m/11/34cm Apothaker  
SEP 08 2009  
W.A. Shaw  
Prothonotary/Clerk of Courts

**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, Esquire

Dated: August 24, 2009

SC 81-10082A-11-A-1-C-A  
Superseded by A-11-A-1-C-A  
2009-09-08

CLERK'S OFFICE OF THE STATE OF PENNSYLVANIA

**FILED**

SEP 08 2009

William A. Shaw  
Prothonotary/Clerk of Courts