

07-1278-CD  
Professional Inv. Vs Sandra Douglas

112410

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY  
PENNSYLVANIA

Professional Investment  
FINANCES, LLC (Plaintiff)

CIVIL ACTION

c/o David J. Apothaker, Esq. No. 07-1278-CD  
(Street Address)  
2417 Welsh Road Suite 21 #520 Type of Case: civil  
Phila., PA 19114  
(City, State ZIP) Type of Pleading: complaint

VS.

Filed on Behalf of:

Sandra K Douglas (Plaintiff/Defendant)  
(Defendant)

217 State St.

(Street Address)

Curwensville PA 16833

(City, State ZIP)

David J. Apothaker, Esquire  
(Filed by)

2417 Welsh Rd Suite 21 #520  
Phila., PA 19114

(Address)

215-634-8920

(Phone)

(Signature)

**FILED** Atty pd.  
M 13 08/01 85.00  
AUG 09 2001  
CC Atty

William A. Shaw  
Prothonotary/Clerk of Courts  
CC Sheriff

Our File No.: 112410  
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

---

PROFESSIONAL INVESTMENT & ) COURT OF COMMON PLEAS  
FINANCES LLC ) CLEARFIELD COUNTY  
c/o Apothaker & Associates, P.C. )  
2417 Welsh Road, Suite 21 #520 ) NO.:  
Philadelphia, PA 19114 )  
Plaintiff, )  
vs. )  
SANDRA KDOUGLAS )  
217 STATE ST )  
CURWENSVILLE, PA 16833 )  
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 within 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 ONCE. 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 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

---

PROFESSIONAL INVESTMENT &  
FINANCES LLC ) COURT OF COMMON PLEAS  
c/o Apothaker & Associates, P.C. ) CLEARFIELD COUNTY  
2417 Welsh Road, Suite 21 #520 )  
Philadelphia, PA 19114 ) NO.:  
Plaintiff, )  
vs. )  
SANDRA KDOUGLAS )  
217 STATE ST )  
CURWENSVILLE, PA 16833 )  
Defendant. )

---

**CIVIL ACTION COMPLAINT  
FIRST COUNT**

1. Plaintiff, PROFESSIONAL INVESTMENT & FINANCES 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 SANDRA KDOUGLAS, an adult individual residing at 217 STATE ST CURWENSVILLE, PA 16833.

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 \$5,191.36.

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

9. The original creditor is FUSA.

WHEREFORE, Plaintiff demands judgment in favor of Plaintiff and against Defendant(s) for the sum of \$5,191.36 plus costs, and reasonable attorney's fees.

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

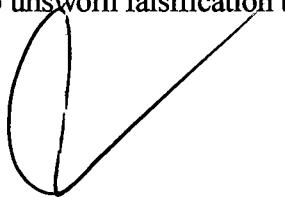
BY:   
David J. Apothaker

Dated: 8/2/2007

Our File No.: 112410

**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.

A handwritten signature in black ink, appearing to read "David J. Apothaker", is written over a horizontal line. The signature is fluid and cursive, with a large, open loop on the left and a diagonal stroke extending to the right.

---

David J. Apothaker  
Attorney for Plaintiff

DATE: 8/2/2007

PROFESSIONAL INVESTMENT & FINANCES LLC  
c/o Apothaker & Associates, P.C.  
2417 Welsh Road, Suite 21 #520  
Philadelphia, PA 19114

SANDRA KDOUGLAS  
217 STATE ST  
CURWENSVILLE, PA 16833

STATEMENT OF ACCOUNT

Debtor's Name: SANDRA KDOUGLAS  
Account Number: 4417112954301281  
Original Creditor: FUSA  
Balance Due: \$5,191.36

Our File No.: 112410

EXHIBIT "A"

**IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA**

DOCKET # 103090  
NO: 07-1278-CD  
SERVICE # 1 OF 1  
COMPLAINT

PLAINTIFF: PROFESSIONAL INVESTMENT & FINANCES LLC  
VS.  
DEFENDANT: SANDRA K DOUGLAS

**SHERIFF RETURN**

NOW, August 14, 2007 AT 9:15 AM SERVED THE WITHIN COMPLAINT ON SANDRA K. DOUGLAS DEFENDANT AT 217 STATE ST., CURWENSVILLE, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO SANDRA K. DOUGLAS, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DAVIS /

**FILED**

JAN 11 2008

o/1:30/08

William A. Shaw

Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	APOTHAKER	55466G	10.00
SHERIFF HAWKINS	APOTHAKER	55466G	23.82

Sworn to Before Me This

Day of

2008  
2007

So Answers,

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

Our File No.: 112410  
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

---

PROFESSIONAL INVESTMENT & ) COURT OF COMMON PLEAS  
FINANCES LLC ) CLEARFIELD COUNTY  
)  
Plaintiff, )  
vs. )  
SANDRA KDOUGLAS ) NO. 07-1278-CD  
)  
)  
)  
)  
Defendant. )

---

**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

Dated: November 13, 2007

**FILED**  
01/09/39/01  
APR 01 2001  
1 min  
Cert. of  
Disc. to Def.  
(in person)  
W.C. (initials)  
William A. Shinn  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

OPY

Professional Investment & Finances, LLC

Vs.  
Sandra K. Douglas

No. 2007-01278-CD

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 April 1, 2008, marked:

Dismissed without Prejudice

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

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 1st day of April A.D. 2008.



\_\_\_\_\_  
William A. Shaw, Prothonotary