

07-1329-CD

Palisades Coll. Vs Harold W Hand

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

PALISADES COLLECTION, L.L.C. ASSIGNEE OF
CHASE MANHATTAN BANK

No.

07-1329 CD

C/O WOLPOFF & ABRAMSON, L.L.P.
4660 TRINDLE ROAD, 3rd FLOOR
CAMP HILL, PA 17011

Plaintiff

Type of Case: Contract

Type of Pleading:

VS.

Filed on Behalf of: Plaintiff

HAROLD W HAND
1775 VIADUCT RD
ROCKTON PA 158561307

Defendant(s)

Date: 8/13/04

Amy Doyle
✓ Amy F. Doyle #87062 / Daniel F. Wolfson #20617
Philip C. Warholic #86341 / David R. Galloway #87326
Tonilyn M. Chippie #87852 / Sarah E. Ehasz #86469
Robert N. Polas, Jr. #201259 / Bruce H. Cherkis #18837
Ronald S. Canter #94000 / Ronald M. Abramson #94266
Wolpoff & Abramson, L.L.P.
Attorneys in the Practice of Debt Collection
4660 Trindle Road, Suite 300
Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

FILED *ICC Sheriff*
AUG 17 2007 *11:23 AM*
Atty pd. *85.00*
William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION,L.L.C. :
ASSIGNEE OF CHASE MANHATTAN BANK : No.
Plaintiff :
vs :
HAROLD W HAND : CIVIL ACTION - LAW
Defendant(s) :
:

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 an 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 or any other claim or relief requested by the Plaintiff. You may lose money or property 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 HELP. 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.

Clearfield County Courthouse
David S. Meholick, Court Administrator 230 East Market Street
Clearfield, PA 16830
814-765-2641

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION,L.L.C. : No.
ASSIGNEE OF CHASE MANHATTAN BANK :
Plaintiff :
vs : CIVIL ACTION - LAW
HAROLD W HAND :
Defendant(s) :
:

NOTICIA

USTED HA SIDO DEMANDADO/A EN LA CORTE. Si usted desea defender conta la demanda puestas en las siguientes paginas, usted tienen que tomar acción dentro veinte (20) dias después que esta Demanda y Aviso es servido, con entrando por escrito una apariencia personalmente o por un abogado y archivando por escrito con la Corte sus defensas o objeciones a las demandas puestas en esta contra usted. Usted es advertido que si falla de hacerlo el caso puede proceder sin usted y un juzgamiento puede ser entrado conta usted por la Corte sin mas aviso por cualquier dinero reclamado en la Demanda o por cualquier otro reclamo o alivio solicitado por Demandante. Usted puede perder dinero o propiedad o otros derechos importante para usted.

USTED DEBE LLEVAR ESTE PAPEL A SU ABOGADO ENSEGUIDA. SI USTED NO TIENE UN ABOGADO, VAYA O LLAME POR TELEFONO LA OFICINA FIJADA AQUI ABAJO. ESTA OFICINA PUEDE PROVEERE CON INFORMACION DE COMO CONSEGUIR UN ABOGADO.

SI USTED NO PUEDE PAGARLE A UN ABOGADO, ESTA OFICINA PUEDE PROVEERE INFORMACION ACERCA AGENCIAS. QUE PUEDAN OFRECER SERVICIOS LEGAL A PERSONAS ELIGIBLE AQ UN HONORARIO REDUCIDO O GRATIS.

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David S. Meholic, Court Administrator 230 East Market Street
Clearfield, PA 16830
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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION, L.L.C.
ASSIGNEE OF CHASE MANHATTAN BANK
Plaintiff

vs

HAROLD W HAND
Defendant(s)

COMPLAINT

AND NOW, comes the Plaintiff, by and through its attorneys and the law firm of Wolpoff & Abramson, LLP, and files this Complaint and in support avers as follows:

1. Plaintiff is PALISADES COLLECTION,L.L.C. ASSIGNEE OF CHASE MANHATTAN BANK , located at 210 Sylvan Avenue Englewood Cliffs, NJ 07632.
2. Defendant, HAROLD W HAND, is an adult individual with a last known address of 1775 Viaduct Rd Rockton, Clearfield County, PA 15856-1307.
3. It is averred that Defendant was issued an open end credit account (hereinafter "Account").
4. At all relevant times material hereto, Defendant has been regular users of said Account for the purchase of products, goods and/or for obtaining services.

5. Defendant was provided with copies of the Statement of Accounts showing all debits and credits for transactions on the aforementioned credit card account to which there was no bona fide objection by Defendant. A true and correct copy of the Statement of Account is attached hereto, incorporated herein and marked as Exhibit "A".

6. Defendant did not object to the above-mentioned statement submitted by Plaintiff and/or its assignors to Defendant.

7. As of the date of this Complaint, the remaining balance due, owing and unpaid on Defendant's credit card account as a result of the charges made by said Defendant and/or any authorized users is the sum of \$8,776.28.

8. Interest has accrued from the charge off date at a rate of 6 %.

9. As of the date of the filing of this Complaint, the amount of interest which has accrued is the sum of \$1,265.22.

10. As of the filing of this Complaint, Plaintiff has incurred reasonable attorney's fees from the law office of Wolpoff & Abramson, LLP in the collection of the amounts due from Defendant incident to the within action based upon 20% of the principal amount due and owing, and Plaintiff shall continue to incur such attorney's fees through the conclusion of the proceedings.

11. The amount of attorney's fees which has accrued is the sum of \$1,755.26.

12. Despite reasonable and repeated demands for payment, Defendant has refused and continues to refuse to pay all sums due and owing on the aforementioned account balance, all to the damage and detriment of the Plaintiff.

13. Plaintiff performed any and all conditions precedent to the bringing of this action.

14. The amount in controversy is within the jurisdictional amount requiring compulsory arbitration.

WHEREFORE, Plaintiff respectfully requests this Honorable Court enter Judgment in favor of the Plaintiff and against Defendant in the amount of \$8,776.28, plus interest in the amount of \$1,265.22, plus attorney's fees in the amount of \$1,755.26, plus costs of this action and any other relief as this Court deems just and reasonable.

Respectfully Submitted,

Date: 8/13/07



Amy F. Doyle #87062 / Daniel F. Wolfson #20617
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4660 Trindle Road, Suite 300
Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

VERIFICATION

The undersigned hereby states that they are the attorney for the Plaintiff who is located outside of this jurisdiction and in order to file the within document in an expedient and timely manner, they are authorized to take this verification on behalf of said Plaintiff in the within action and verifies that the statements made in the foregoing Pleading are true and correct to the best of their knowledge, information, and belief, based upon information provided by the Plaintiff.

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

Date: 8/13/07

 Amy F. Doyle

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Telephone: (717) 303-6700
Counsel for Plaintiff

Exhibit "A"

PLAINTIFF = 425230
ACCOUNT NUMBER = 5435051500066490
POOL ID = CHASMP
CURRENT BALANCE = 8776.28
LSTPYMTDT = 20040729
CO DATE = 20050228
DEBTOR #1 LAST NAME = HAND
DEBTOR #1 FIRST NAME = HAROLD W
DEBTOR #1 MIDDLE NAM =
DEBTOR #1 ADDR 1 = PO BOX 244
DEBTOR #1 ADDR 2 =
DEBTOR #1 CITY = ROCKTON
DEBTOR #1 STATE = PA
DEBTOR #1 ZIP = 15856
DEBTOR #1 HOMEPHONE = 8145837621
DEBTOR #1 WORKPHONE = 0000000000
DEBTOR #1 SOCSEC = 197662530
DEBTOR #1 DOB =
DEBTOR #2 LAST NAME =
DEBTOR #2 FIRST NAME =
DEBTOR #2 MIDDLE NAM =
DEBTOR #2 ADDR 1 = Rd
DEBTOR #2 ADDR 2 =
DEBTOR #2 CITY = ROCKTON
DEBTOR #2 STATE = PA
DEBTOR #2 ZIP = 15856
DEBTOR #2 HOMEPHONE = 8145837621
DEBTOR #2 WORKPHONE = 0000000000
DEBTOR # SOCSEC =
DEBTOR#2 DOB =
DEBTOR = 4145266
= 20020605
=

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION, L.L.C.
ASSIGNEE OF CHASE MANHATTAN BANK
Plaintiff

No. 07-1329-CD
CIVIL ACTION - LAW

VS

HAROLD W HAND
Defendant(s)

PRAECIPE TO DISCONTINUE

To the Prothonotary:

Please mark the above-entitled case as discontinued without prejudice.

Respectfully Submitted,

Date: 9/11/07


Amy F. Doyle #87062 / Daniel F. Wolfson #20617
Philip C. Warholic #86341 / David R. Galloway #87326
Tonilyn M. Chippie #87852 / Sarah E. Ehasz #86469
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4660 Trindle Road, Suite 300
Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

FILED 1cc + 1 cert
m/11/30 cm of disc
SEP 17 2007 issued to
Atty Galloway

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

PALISADES COLLECTION,L.L.C.
ASSIGNEE OF CHASE MANHATTAN BANK
Plaintiff

No. 07-1329-CD

vs.

CIVIL ACTION - LAW

HAROLD W HAND
Defendant(s)

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a copy of the foregoing praecipe was served this date by Regular Mail, Postage Pre-Paid on this 13 day of September, 2007.

Harold W Hand
1775 VIADUCT RD
ROCKTON, PA 158561307



Amy F. Doyle #87062 / Daniel F. Wolfson #20617
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Telephone: (717) 303-6700
Counsel for Plaintiff

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

COPY

Palisades Collection, L.L.C.
Chase Manhattan Bank

Vs. No. 2007-01329-CD
Harold W. Hand

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 September 17, 2007, marked:

Discontinued without prejudice

Record costs in the sum of \$85.00 have been paid in full by Amy F. Doyle Esq. .

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 17th day of September A.D. 2007.



cm

William A. Shaw, Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103110
NO: 07-1329-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: PALISADES COLLECTION, L.L.C. Assignee
vs.
DEFENDANT: HAROLD W. HAND

SHERIFF RETURN

NOW, August 30, 2007 AT 10:05 AM SERVED THE WITHIN COMPLAINT ON HAROLD W. HAND DEFENDANT AT 1775 VIADUCT RD, ROCKTON, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO HAROLD HAND, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: NEVLING / COUDRIET

FILED

JAN 14 2008

0/3/30/

William A. Shaw

Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	WOLPOFF	209483	10.00
SHERIFF HAWKINS	WOLPOFF	209483	31.02

Sworn to Before Me This

____ Day of _____ 2007

So Answers,

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