

07-1384-CD
LVNV Funding vs K. Renaud

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

LVNV FUNDING, LLC
ASSIGNEE OF SHERMAN ACQUISITION
ASSIGNEE OF SEARS

Plaintiff

NO. 07-1384-CD

vs.

CIVIL ACTION - LAW

KIMBERLY RENAUD
Defendant

PRAECIPE TO DISCONTINUE ATTACHMENT EXECUTION

To the Prothonotary:

Kindly mark the attachment against the Garnishee, CLEARFIELD BANK AND TRUST COMPANY, discontinued, upon payment of your costs only.

Respectfully Submitted,

Dated: 9/11/08

Amy F. Doyle #87062
Philip C. Warholic #86341

Philip C. Warholic #86341
David R. Galloway #87326
Sarah E. Ehasz #86469
Robert N. Polas, Jr. #201259
MANN BRACKEN LLC
The Successor by Merger to Wolpoff & Abramson, LLP
and Eskanos & Adler, PC
Attorneys in the Practice of Debt Collection
4660 Trindle Rd., Suite 300
Camp Hill, PA 17011
(717) 303-6700

MB File No. 172404608

FILED *acc Atty Warholic*
M 12:15 CM
SEP 18 2008
William A. Shaw
Prothonotary/Clerk of Courts
CC Clearfield
Bank + trust
(envelope provided)

SHAPIRO LAW OFFICE, P.C.
Kenneth S. Shapiro, Esq.
Attorney I.D. #26850
712 Darby Road
P.O. Box 20
Havertown, PA 19083-0210
(610) 668-0707

No. of Pages 1

LVNV FUNDING LLC
Plaintiff

v.
Kimberly Renaud
Defendant(s)

Court Of Common Pleas
CLEARFIELD County, PA

CIVIL CASE NO. 2007-01384-CD

ENTRY OF APPEARANCE

TO THE DIRECTOR OF THE DEPARTMENT OF COURT RECORDS OF
CLEARFIELD COUNTY, PENNSYLVANIA (CIVIL DIVISION):

Kindly enter my appearance on behalf of LVNV FUNDING LLC, Plaintiff
herein.

I hereby certify that this change is not intended to, nor will it, delay this
proceeding to the best of my knowledge, information and belief.

Papers may be served at the address set forth below:

FILED
45
JUL 07 2014
BRIAN K. SPENCER
PROTHONOTARY & CLERK OF COURTS
M/324/B1S
lcc

Dated: JUL 02 2014

EW840

Kenneth S. Shapiro, Esq.
Attorney ID # 26850
Shapiro Law Office, PC
712 Darby Rd
P.O. Box 20
Havertown, PA 19083-0210
Telephone # 610-668-0707
FAX # 610-668-1815

Respectfully submitted,
SHAPIRO LAW OFFICE, P.C.

By: Kenneth S. Shapiro
Kenneth S. Shapiro, Esq.
For the firm

**COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA**

LVNV FUNDING, LLC ASSIGNEE OF SHERMAN
ACQUISITION ASSIGNEE OF SEARS

No. 07-1384-CD

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

Plaintiff

Type of Case: Contract

VS.

Type of Pleading:

KIMBERLY RENAUD
126 SW 3RD AVE
CLEARFIELD PA 16830

Filed on Behalf of: Plaintiff

Defendant(s)

Date: 8/20/02

AB
Amy F. Doyle #87062 / Daniel F. Wolfson #20617
~~Philip C. Warholic #86341~~ / David R. Galloway #87326
~~Tonilyn M. Chippie #87832~~ / 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 Atty pd. 85.00
M 3:43 PM AUG 27 2002
Clerk Sheriff
William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LVNV FUNDING, LLC
ASSIGNEE OF SHERMAN ACQUISITION
ASSIGNEE OF SEARS
Plaintiff

: No.

vs

KIMBERLY RENAUD
Defendant(s)

: CIVIL ACTION - LAW

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

LVNV FUNDING, LLC
ASSIGNEE OF SHERMAN ACQUISITION
ASSIGNEE OF SEARS
Plaintiff

: No.

: CIVIL ACTION - LAW

vs

KIMBERLY RENAUD
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 A UN HONORARIO REDUCIDO O GRATIS.

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

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LVNV FUNDING, LLC : No.
ASSIGNEE OF SHERMAN ACQUISITION :
ASSIGNEE OF SEARS :
Plaintiff : CIVIL ACTION - LAW
vs :
KIMBERLY RENAUD :
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 LVNV FUNDING, LLC ASSIGNEE OF SHERMAN ACQUISITION ASSIGNEE OF SEARS , located at 15 South Main Street Greenville, SC 29601.
2. Defendant, KIMBERLY RENAUD, is an adult individual with a last known address of 126 Sw 3Rd Ave Clearfield, Clearfield County, PA 16830.
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 a regular user 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 statements 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 \$8,762.76.

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 \$766.32.

10. 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.

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

12. 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 \$8,762.76, plus interest in the amount of \$766.32, plus costs of this action and any other relief as this Court deems just and reasonable.

Respectfully Submitted,

Date: 3/22/02


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

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: 3/20/02


Amy F. Doyle #87062 / Daniel F. Wolfson #20617
Philip C. Warholic #86341 / David R. Galloway #87326
Tonilyh 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

Exhibit "A"

November 20, 2007

Clearfield County Courthouse
David S. Meholic
Court Administrator
230 E. Market St.
Clearfield, Pa 16830

RECEIVED
PROTHONOTARY'S OFFICE
11/29/07
WILLIAM A. SHAW
PROTHONOTARY/CLERK OF COURTS

RE: No. 07-1384-CD

Dear Mr. Meholic,

Enclosed please find a copy of letter sent via registered mail today to Wolpoff & Abramson, LLP, in reference to the above case. I am disputing this claim, awaiting verification from the creditor.

Sincerely,

Kimberly A. Renaud
Kimberly A. Renaud

November 20, 2007

Kimberly Renaud
126 S.W. 3rd Ave.
Clearfield, Pa 16830

Wolpoff & Abramson, LLP
4660 Trindle Road
Suite 300
Camp Hill, Pa 17011

RE: W & A File No. 172404608
LVNV Funding, LLC
\$8,762.76

To whom it may concern,

This letter is to notify you that I dispute the above referenced debt. I request that you verify this account with all the pertinent information, including the original principal amount, late charges, interest, and other collection costs that have been added. According to my records, the amount is excessive of the original credit limit on this account. Please cease all efforts to collect this account until you have provided me the validation or verification information I have requested.

Sincerely,

Kimberly A. Renaud

cc: Clearfield County Courthouse
Court Administrator

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103137
NO. 07-1384-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: L VNV FUNDING, LLC Assignee
vs.
DEFENDANT: KIMBERLY RENAUD

SHERIFF RETURN

NOW, September 05, 2007 AT 8:45 AM SERVED THE WITHIN COMPLAINT ON KIMBERLY RENAUD DEFENDANT AT SHERIFF'S OFFICE, 1 N. 2ND ST., SUITE 116, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO KIMBERLY RENAUD, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: HUNTER /

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	WOLPOFF	212863	10.00
SHERIFF HAWKINS	WOLPOFF	212863	21.41

FILED
01:40pm
JAN 21 2008
AS

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

Day of 2008
2007

So Answers,

Chester A. Hawkins
by Mealy Hawkins
Chester A. Hawkins
Sheriff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LVNV FUNDING, LLC
ASSIGNEE OF SHERMAN ACQUISITION
ASSIGNEE OF SEARS

Plaintiff

No. 07-1384-CD

VS

CIVIL ACTION - LAW

KIMBERLY RENAUD
Defendant(s)

PRAECLYPE FOR JUDGMENT

Please enter Judgment in favor of Plaintiff and against Defendant(s), KIMBERLY RENAUD , for failure to answer the Complaint.

(X)	Amount due	\$9,529.08
	TOTAL	\$9,529.08, plus interest and costs

(X) I certify that the foregoing assessment of damages is for specified amounts alleged to be due in the complaint and is calculable as a sum certain from the complaint.

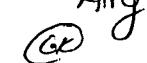
(X) Pursuant to Pa.R.C.P. 237 (Notice of Praeclipe for final judgment or decree), I certify that a copy of this praecipe has been mailed to each other party who has appeared in the action or to his/her Attorney of Record.

(X) Pursuant to Pa.R.C.P. 237.1, I certify that written notice of the intention to file this praecipe was mailed or delivered to the party against whom judgment is to be entered and to his/her Attorney of Record, if any, after the default occurred and at least ten days prior to the date of the filing of this praecipe and a copy of the notice is attached.

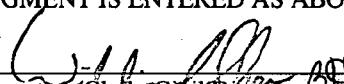
Date: 4/9/08


Amy F. Doyle #87062 / Daniel E. Wolfson #20617
Philip C. Warholic #86341 / David R. Galloway #87326
Tonilyn M. Chippie #87852 / Sarah E. Ehasz #86469
Robert N. Polas, Jr. #201259
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 Atty pd. 20.00
7/1/2008 APR 16 2008
1CC Notice to Def.

William A. Shaw Statement to
Prothonotary/Clerk of Courts Atty


NOW, April 16, 2008, JUDGMENT IS ENTERED AS ABOVE.


Prothonotary/Clerk, Civil Division

By:

Deputy

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LVNV FUNDING, LLC
ASSIGNEE OF SHERMAN ACQUISITION
ASSIGNEE OF SEARS

Plaintiff

No. 07-1384-CD

vs.

KIMBERLY RENAUD
Defendant(s)

CIVIL ACTION - LAW

AFFIDAVIT OF NON-MILITARY SERVICE

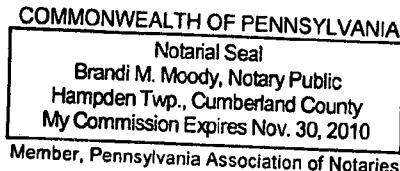
COMMONWEALTH OF PENNSYLVANIA :
: :
COUNTY OF CLEARFIELD :

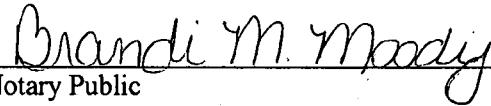
The undersigned counsel, being duly sworn according to law, depose and say that I am the Attorney for the Plaintiff in the above-captioned matter, and that to the best of my knowledge, information and belief Defendant, Kimberly Renaud, above-named, is over 21 years of age; is last known to reside at 126 Sw 3Rd Ave, Clearfield, County of Clearfield, Pennsylvania; is not in the military service of the United States or its Allies, or otherwise within the provisions of the Servicemembers Civil Relief Act and its Amendments.

Date: 4/8/08


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
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

SWORN and SUBSCRIBED to before me this 8th day of April, 2008.




Brandi M. Moody
Notary Public

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LVNV FUNDING, LLC
ASSIGNEE OF SHERMAN ACQUISITION
ASSIGNEE OF SEARS

Plaintiff

No. 07-1384-CD

vs.

KIMBERLY RENAUD
Defendant(s)

CIVIL ACTION - LAW

CERTIFICATE OF RESIDENCE
PA. R.C.P. 236

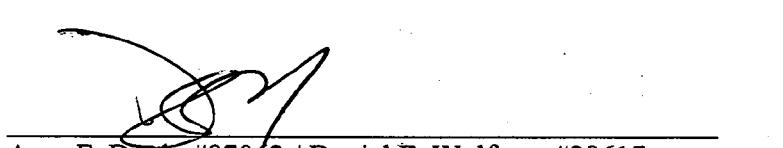
I hereby certify that the precise address of Plaintiff is:

Lvnv Funding, Llc
15 South Main Street
Greenville SC 29601

and certify that the last known address of the within Defendant(s) is:

Kimberly Renaud
126 Sw 3Rd Ave
Clearfield PA 16830

Date: 4/16/08


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
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

MAIN OFFICE
TWO IRVINGTON CENTRE
702 KING FARM BLVD., ROCKVILLE, MD 20850

REGIONAL OFFICES

10605 JUDICIAL DR., BLDG. A-5, FAIRFAX, VA 22303
17 WEST CARY STREET, RICHMOND, VA 23220
5122 GREENWICH RD., VIRGINIA BEACH, VA 23462
919 N. MARKET ST., STE. 1300, WILMINGTON, DE 19899
1 VALLEY BANK BLDG., BOX 1226, CLARKSBURG, WV 26302
4660 TRINDLE ROAD, 3RD FLOOR, CAMP HILL, PA 17011
301 GRANT ST., STE. 4300, PITTSBURGH, PA 15219
28632 ROADSIDE DR., STE. 265, AGOURA HILLS, CA 91301
39500 HIGH POINTE BLVD., STE. 250, NOVI, MI 48375
300 CANAL VIEW BLVD., ROCHESTER, NY 14623
5215 N. O'CONNOR BLVD., STE. 1060, IRVING, TX 75039
3200 SOUTHWEST FREEWAY, STE. 3300, HOUSTON, TX 77027
111 SOLEDAD ST., STE. 300, SAN ANTONIO, TX 78205
1201 PEACHTREE STREET, STE. 1717, ATLANTA, GA 30361
301 CARLSON PKWY., STE. 303, MINNETONKA, MN 55305
4643 S. ULSTER ST., STE. 800, DENVER, CO 80237
5355 TOWN CENTER RD, STE. 1002, BOCA RATON, FL 33486

LAW OFFICES
WOLPOFF & ABRAMSON, L.L.P.
Attorneys in the Practice of Debt Collection
(A National Collection Attorney Network Firm)
4660 TRINDLE ROAD
SUITE 300
CAMP HILL, PA 17011

(TOLL FREE)
(800) 830-2793

FACSIMILE (866) 281-9028

PLEASE DIRECT ALL INQUIRIES TO THE CAMP HILL OFFICE

March 25, 2008

KIMBERLY RENAUD
126 SW 3RD AVE
CLEARFIELD, PA 16830

NATIONAL COLLECTION ATTORNEY NETWORK
AFFILIATED FIRM LOCATIONS (NOT REGIONAL
OFFICES OF WOLPOFF & ABRAMSON, L.L.P.)*

BIRMINGHAM, ALABAMA
ANCHORAGE, ALASKA
PHOENIX, ARIZONA
LITTLE ROCK, ARKANSAS
EAST HARTFORD, CONNECTICUT
HONOLULU, HAWAII
BOISE, IDAHO
CHICAGO, ILLINOIS
MERRILLVILLE, INDIANA
KANSAS CITY, KANSAS
LEXINGTON, KENTUCKY
METAIRIE, LOUISIANA
WORCESTER, MASSACHUSETTS
ST. LOUIS, MISSOURI
GREAT FALLS, MONTANA
OMAHA, NEBRASKA
LAS VEGAS, NEVADA
MANCHESTER, NEW HAMPSHIRE
CEDAR KNOLLS, NEW JERSEY
RALEIGH, NORTH CAROLINA

FARGO, NORTH DAKOTA
CLEVELAND, OHIO
OKLAHOMA CITY, OKLAHOMA
EUGENE, OREGON
PROVIDENCE, RHODE ISLAND
COLUMBIA, SOUTH CAROLINA
KNOXVILLE, TENNESSEE
SANDY, UTAH
MILWAUKEE, WISCONSIN
RAWLINS, WYOMING
SEATTLE, WASHINGTON

* The National Collection
Attorney Network is an
affiliation of separate law firm:

W&A Hours of Operation:
8 a.m. - 6 p.m. M-F

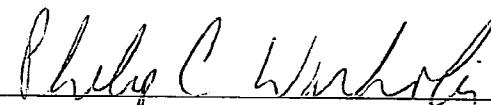
W&A File No. 172404608

RE: LNVN FUNDING, LLC ASSIGNEE OF SHERMAN ACQUISITION ASSIGNEE
OF SEARS
vs. KIMBERLY RENAUD

Dear Kimberly Renaud:

Enclosed herein please find a 10-Day Notice pursuant to Rule 237.1 of the
Pennsylvania Rules of Civil Procedure.

Sincerely,



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

Wolpoff & Abramson, L.L.P.

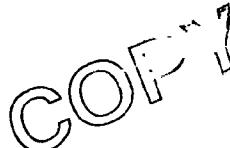
Attorneys in the Practice of Debt Collection

4660 Trindle Road, Wolpoff & Abramson, L.L.P.

Camp Hill, PA 17011

Telephone: (800) 830-2793

Counsel for Plaintiff



Enclosure

CC:

This is an attempt by a debt collector to collect a debt and any information obtained will
be used for that purpose

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

LVNV FUNDING, LLC
ASSIGNEE OF SHERMAN ACQUISITION
ASSIGNEE OF SEARS

NO. 07-1384-CD

Plaintiff

vs.

CIVIL ACTION - LAW

KIMBERLY RENAUD

Defendant(s)

TO: KIMBERLY RENAUD
126 SW 3RD AVE
CLEARFIELD PA 16830

DATE OF NOTICE: March 25, 2008

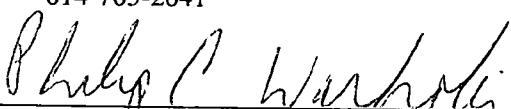
IMPORTANT NOTICE

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 DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. 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



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
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

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LVNV FUNDING, LLC
ASSIGNEE OF SHERMAN ACQUISITION
ASSIGNEE OF SEARS
Plaintiff

No. 07-1384-CD

CIVIL ACTION - LAW

vs.

KIMBERLY RENAUD
Defendant(s)

NOTICE OF JUDGMENT

(x) Notice is hereby given that a Judgment in the above-captioned matter has been entered against you in the amount of \$9,529.08, plus interest, on April 10, 2008.

(x) A copy of all documents filed with the Prothonotary in support of the within judgment is/are attached.

By: William Shanks

If you have any questions regarding this Notice, please contact the filing party.

Date:

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
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

This Notice is given in accordance with Pa.R.C.P. 236.)

NOTICE SENT TO: Kimberly Renaud
126 Sw 3Rd Ave
Clearfield PA 16830

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

COPY

LVNV Funding, LLC
Sherman Acquisition
Sears
Plaintiff(s)

No.: 2007-01384-CD

Real Debt: \$9,529.08

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Kimberly Renaud
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: April 16, 2008

Expires: April 16, 2013

Certified from the record this 16th day of April, 2008.



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

PRAECIPE FOR WRIT OF EXECUTION (MONEY JUDGMENT)
P.R.C.P. 3101 to 3149

LVNV FUNDING, LLC
ASSIGNEE OF SHERMAN ACQUISITION
ASSIGNEE OF SEARS

Plaintiff

vs.

KIMBERLY RENAUD

Defendant(s)

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

FILED

JUN 23 2008

IN 2008
William A. Shaw
Prothonotary/Clerk of Courts

JUDGMENT NO. 07-1384-CD

PRAECIPE FOR WRIT OF EXECUTION 3 CENTS IN 6 MONTHS
(MONEY JUDGMENT) TO 5 HENRY + 1 CENT TO AFTL

To the Prothonotary: Please issue the Writ of Execution in the above-captioned matter, in the amount of \$9,529.08.

- (1) Directed to the Sheriff of CLEARFIELD County, Pennsylvania;
- (2) against, KIMBERLY RENAUD located at 126 SW 3RD AVE, CLEARFIELD, PA 16830, Defendant(s)
- (3) and against, CLEARFIELD BAND AND TRUST located at 11 N 2ND ST, CLEARFIELD, PA 16830, Garnishee(s);
- (4) and index this writ
 - (a) against, KIMBERLY RENAUD, Defendant(s) and
 - (b) against, CLEARFIELD BAND AND TRUST, Garnishee(s),

as a lis pendens against the real property of the Defendant(s) in the name of the Garnishee(s) as follows:
(Specifically describe property) ***GARNISH ONLY***

You are directed to attach the property of the Defendant(s) not levied upon in the possession of
CLEARFIELD BAND AND TRUST located at 11 N 2ND ST, CLEARFIELD, PA 16830, Garnishee(s).

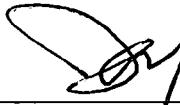
All accounts including but not limited to all savings, checking and other accounts, certificates of deposit, notes
receivables, collateral, pledges, documents of title, securities, coupons and safe deposit boxes.

Amount due \$9,529.08
Interest from 04/16/2008 To Be Determined
At an interest rate of 6% per year

Total \$9,529.08 Plus costs & interest

Prothonotary costs \$125.00

Date: 6/17/08


Amy F. Doyle #87062 / Philip C. Warholic #86341 /
David R. Galloway #87326 / [REDACTED]
Sarah E. Ehasz #86469 / Robert N. Polas, Jr. #201259
Wolpoff & Abramson, L.L.P.
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4660 Trindle Road, Suite 300
Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LVNV FUNDING, LLC
ASSIGNEE OF SHERMAN ACQUISITION
ASSIGNEE OF SEARS

Plaintiff

No. 07-1384-CD

VS

CIVIL ACTION - LAW

KIMBERLY RENAUD

Defendant(s)

INTERROGATORIES TO GARNISHEE

TO: CLEARFIELD BAND AND TRUST
11 N 2ND ST
CLEARFIELD, PA 16830

PURSUANT TO RULE 3253 OF THE RULES OF CIVIL PROCEDURE, THE FOLLOWING INTERROGATORIES HAVE BEEN SERVED UPON YOUR INSTITUTION. GARNISHEE IS HEREBY REQUIRED TO ANSWER EACH OF THE FOLLOWING INTERROGATORIES SEPARATELY AND FULLY. PLEASE COMPLETE THE FOLLOWING INTERROGATORIES TO ASSIST THE CREDITOR'S EFFORTS TO SATISFY THE LAWFUL OBLIGATION OF THE ABOVE REFERENCED DEBTOR(S).

IMPORTANT NOTICES AND INSTRUCTIONS TO GARNISHEE

- A. You are required to file answers to the following interrogatories within twenty (20) days after service upon you. Failure to do so may result in judgment against you.
- B. The term "Defendant(s)" means the individual(s) or entity against whom the Writ of Execution was issued.
- C. "You" means the main office and all branch offices, representatives, employees, and agents of your organization.
- D. By service of the Writ of Execution upon you, all property of the Defendant(s) subject to attachment which is in your possession, custody or control is attached, including all property of the Defendant(s) which comes into your possession thereafter.
- E. These Interrogatories are considered to be continuing and therefore should be modified or supplemented as you receive further or additional information.
- F. Where exact information cannot be furnished, estimated information is to be supplied. When an estimate is to be used, it should be identified as such, and an explanation should be given as to the basis on which the estimate is made, and the reason the exact information cannot be furnished.
- G. Where knowledge or information in possession of a party is requested, such request includes knowledge of the party's agents, representatives, and attorneys.

INTERROGATORIES TO GARNISHEE
DEFENDANT(S) - KIMBERLY RENAUD

1. DEPOSITORY ACCOUNTS: At the time you were served or at any subsequent time, state whether or not the Defendant(s) maintains any checking, savings, lines of credit, certificate of deposit's or other depository accounts with your institution. If so, state the identification numbers of those accounts, and the amount or amounts the Defendant(s) has in each account. If the Defendant(s) maintains any of these jointly with any other person, or persons, give their name and address.

1A. DIRECT DEPOSIT ACCOUNTS: Are any of the accounts you have listed above direct deposit accounts? If yes, please state the identification numbers of those accounts.

2. If you are a bank or other financial institution, at the time you were served or at any subsequent time did the defendant have funds on deposit in an account in which funds are deposited electronically on a recurring basis and which are identified as being funds that upon deposit are exempt from execution, levy or attachment under Pennsylvania or federal law? If so, identify each account and state the reason for the exemption, the amount being withheld under each exemption and the entity electronically depositing those funds on a recurring basis.

3. If you are a bank or other financial institution, at the time you were served or at any subsequent time did the defendant have funds on deposit in an account in which the funds on deposit, not including any otherwise exempt funds, did not exceed the amount of the general monetary exemption under 42 Pa.C.S. 8123? If so, identify each account.

4. TRANSFER OF PROPERTY: At any time after you were served did you pay, transfer or deliver any money or property to the defendant or to any person or place pursuant to the defendant's direction or otherwise discharge any claim of the defendant against you?

5. SAFE DEPOSIT BOXES: At the time you were served or at any subsequent time, state whether or not the Defendant(s) maintains any safe deposit box or boxes. If so, include the identification number or other designation of the box or boxes. Include a full description of the contents and also the amount of cash among those contents. If the Defendant(s) maintains any of these jointly with any other person or persons give their full name and address.

6. REAL OR PERSONAL PROPERTY: At the time you were served or at any subsequent time, state whether or not Defendant(s) owns any personal property that was in your possession and/or control. If so, include a full description of all personal property giving full value and present location. State also whether or not there are any encumbrances or liens holders, the present balance of the encumbrance. State where and when the encumbrances or liens was recorded. If the Defendant(s) owns any personal property jointly with any person or persons, give names and address.

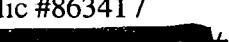
7. OTHER ASSETS: At the time you were served or at any subsequent time, did you know of the existence of any other asset(s) of the Defendant(s) which are not disclosed in the preceding Interrogatories. If so, please set forth all details concerning those asset.

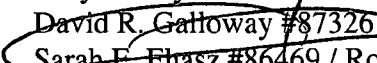
8. PROPERTY HELD AS A FIDUCIARY: At the time you were served or at any subsequent time, did you hold as a fiduciary any property in which any Defendant(s) had an interest? If so, please describe for each Defendant(s) the nature of the property including its value and the interest of Defendant(s).

9. FEES OUTSTANDING TO GARNISHEE: Are there any attorneys fees or processing fees charged by you against the Defendant(s) or account(s) of the Defendant(s) for the completion of this Answer. If yes, outline the exact amount of any fees due and owing to the garnishee or the attorney for the garnishee for the preparation of the Answer.

Date: 6/17/08


Amy F. Doyle #87062 / Philip C. Warholic #86341 /

David R. Galloway #87326 / 


Sarah E. Ehasz #86469 / Robert N. Polas, Jr. #201259

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

**WRIT OF EXECUTION and/or ATTACHMENT
COMMONWEALTH OF PENNSYLVANIA, COUNTY OF CLEARFIELD
CIVIL ACTION – LAW**

LVNV Funding, LLC,
Assingnee of Sherman Acquisition,
Assignee of Sears,

Vs.

NO.: 2007-01384-CD

Kimberly Renaud,

Clearfield Bank & Trust
Garnishee

TO THE SHERIFF OF CLEARFIELD COUNTY:

To satisfy the judgment, interest and costs against LVNV FUNDING, LLC, ASSINGEE OF SHERMAN ACQUISITION, ASSIGNEE OF SEARS, Plaintiff(s) from KIMBERLY RENAUD, , Defendant(s):

- (1) You are directed to levy upon the property of the defendant(s) and to sell defendant's interest(s) therein:
- (2) You are also directed to attach the property of the defendant(s) not levied upon in the possession of: Clearfield Bank and Trust as garnishee(s): and to notify the garnishee(s) that: (a) an attachment has been issued; (b) except as provided in paragraph (c), the garnishee(s) is/are enjoined from paying any debt to or for the account of the defendant(s) and from delivering any property of the defendant(s) or otherwise disposing thereof; (c) the attachment shall not include any funds in an account of the defendant with a bank or other financial institution (i) in which funds are deposited electronically on a recurring basis and are identified as being funds that upon deposit are exempt from execution, levy or attachment under Pennsylvania or federal law, or (ii) that total \$300 or less. If multiple accounts are attached, a total of \$300 in all accounts shall not be subject to levy and attachment as determined by the executing officer. The funds shall be set aside pursuant to the defendant's general exemption provided in 42 Pa.C.S. § 8123.
- (3) If property of the defendant(s) not levied upon and subject to attachment is found in the possession of anyone other than a named garnishee, you are directed to notify such other person that he or she has been added as a garnishee and is enjoined as above stated.
- (4) **If Social Security or Supplemental Income funds are directly deposited into an account of the defendant, the levy and attachment shall not include any funds that may be traced to Social Security direct deposits. In addition, the levy and attachment shall not include \$300.00 in the account of the defendant.**

AMOUNT DUE/PRINCIPAL: \$9,529.08
INTEREST FROM: from 04/16/08 at 6% to be determined
ATTY'S COMM: \$
DATE: 6/23/2008

PROTH. COSTS PAID: \$125.00
SHERIFF: \$
OTHER COSTS: \$



William A. Shaw
Prothonotary/Clerk Civil Division

Received this writ this _____ day
of _____ A.D. _____
At _____ A.M./P.M.

Requesting Party: David R. Galloway, Esq.
4660 Trindle Road, Suite 300
Camp Hill, PA 17011
717-303-6700

Sheriff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 07-1384-CD

LVNV FUNDING, LLC Assignee

vs

KIMBERLY RENAUD

TO: CLEARFIELD BANK & TRUST, Garnishee

WRIT OF EXECUTION; INTERROGATORIES TO GARNISHEE

SERVE BY: 06/30/2008 ASAP

HEARING:

PAGE: 104310

DEFENDANT: CLEARFIELD BANK & TRUST, Garnishee

ADDRESS: 11 N. 2ND ST.

CLEARFIELD, PA 16830

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: GARNISHEE

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

OCCUPIED

William A. Shaw

Prothonotary/Clerk of Courts

ATTEMPTS

FILED

93:15cm
JUN 25 2008

SHERIFF'S RETURN

NOW, 6/25/08 AT 1050 AM / PM SERVED THE WITHIN

WRIT OF EXECUTION; INTERROGATORIES TO GARNISHEE ON CLEARFIELD BANK & TRUST, Garnishee,
DEFENDANT

BY HANDING TO Ron Sayers manager

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

ADDRESS SERVED 11 N. 2nd st. Clearfield Pa

NOW _____ AT _____ AM / PM POSTED THE WITHIN

WRIT OF EXECUTION; INTERROGATORIES TO GARNISHEE FOR CLEARFIELD BANK & TRUST, Garnishee

AT (ADDRESS) _____

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

I MAKE RETURN OF **NOT FOUND** AS TO CLEARFIELD BANK & TRUST, Garnishee

REASON UNABLE TO LOCATE _____

SWORN TO BEFORE ME THIS

DAY OF _____ 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

Deputy S. Hunter
Deputy Signature

S. Hunter
Print Deputy Name

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104310
NO: 07-1384-CD
SERVICES 1
WRIT OF EXECUTION; INTERROGATORIES TO

GARNISHEE

PLAINTIFF: LVNV FUNDING, LLC Assignee

vs.

DEFENDANT: KIMBERLY RENAUD

TO: CLEARFIELD BANK & TRUST, Garnishee

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	WOLPOFF	00283269	10.00
SHERIFF HAWKINS	WOLPOFF	00283269	20.42

FILED

02:20pm
JUN 27 2008

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

So Answers,

____ Day of _____ 2008



Chester A. Hawkins
Sheriff

**WRIT OF EXECUTION and/or ATTACHMENT
COMMONWEALTH OF PENNSYLVANIA, COUNTY OF CLEARFIELD
CIVIL ACTION – LAW**

LVNV Funding, LLC,
Assignee of Sherman Acquisition,
Assignee of Sears,

Vs.

NO.: 2007-01384-CD

Kimberly Renaud,

Clearfield Bank & Trust
Garnishee

TO THE SHERIFF OF CLEARFIELD COUNTY:

To satisfy the judgment, interest and costs against LVNV FUNDING, LLC, ASSIGNEE OF SHERMAN ACQUISITION, ASSIGNEE OF SEARS, Plaintiff(s) from KIMBERLY RENAUD, , Defendant(s):

- (1) You are directed to levy upon the property of the defendant(s) and to sell defendant's interest(s) therein:
- (2) You are also directed to attach the property of the defendant(s) not levied upon in the possession of: Clearfield Bank and Trust as garnishee(s): and to notify the garnishee(s) that: (a) an attachment has been issued; (b) except as provided in paragraph (c), the garnishee(s) is/are enjoined from paying any debt to or for the account of the defendant(s) and from delivering any property of the defendant(s) or otherwise disposing thereof; (c) the attachment shall not include any funds in an account of the defendant with a bank or other financial institution (i) in which funds are deposited electronically on a recurring basis and are identified as being funds that upon deposit are exempt from execution, levy or attachment under Pennsylvania or federal law, or (ii) that total \$300 or less. If multiple accounts are attached, a total of \$300 in all accounts shall not be subject to levy and attachment as determined by the executing officer. The funds shall be set aside pursuant to the defendant's general exemption provided in 42 Pa.C.S. § 8123.
- (3) If property of the defendant(s) not levied upon and subject to attachment is found in the possession of anyone other than a named garnishee, you are directed to notify such other person that he or she has been added as a garnishee and is enjoined as above stated.
- (4) **If Social Security or Supplemental Income funds are directly deposited into an account of the defendant, the levy and attachment shall not include any funds that may be traced to Social Security direct deposits. In addition, the levy and attachment shall not include \$300.00 in the account of the defendant.**

AMOUNT DUE/PRINCIPAL: \$9,529.08
INTEREST FROM: from 04/16/08 at 6% to be determined
ATTY'S COMM: \$
DATE: 6/23/2008

PROTH. COSTS PAID: \$125.00
SHERIFF: \$
OTHER COSTS: \$

William A. Shaw
Prothonotary/Clerk Civil Division

Requesting Party: David R. Galloway, Esq.
4660 Trindle Road, Suite 300
Camp Hill, PA 17011
717-303-6700

Received this writ this 23 day
of June A.D. 2008
At 3:00 P.M.

Chester A. Hawley
Sheriff by Marilyn Hamer

**COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA**

LVNV FUNDING, LLC.
ASSIGNEE OF SHERMAN ACQUISITION
ASSIGNEE OF SEARS
(Plaintiff)

CIVIL ACTION

WOLPOFF & ABRAMSON, L.L.P.
DAVID R. GALLOWAY
Attorney for Plaintiff
4660 Trindle Road, Suite 300
Camp Hill, PA 17011

Case No. 2007-01384-CD

Type Case: CIVIL

Type of Pleading: Answers to
Interrogatories

VS.

KIMBERLY RENAUD
(Defendant)

Filed on Behalf of:
Clearfield Bank & Trust Company
(Garnishee)

(Filed by)
Lori A. Kurtz
Asst. Vice President & Collection Manager
11 N. 2nd St., P.O. Box 171
Clearfield, PA 16830
(Address)
814-765-7551 or 814-762-8825
(Phone)

Lori A. Kurtz
(Signature)

FILED acc

07/26/08 *Clearfield Bank & Trust*
AUG 06 2008

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

LVNV FUNDING, LLC,
Assignee of Sherman Acquisition
Assignee of Sears

PLAINTIFF

VS

KIMBERLY RENAUD

DEFENDANT

Case No: 2007-01384

AND

CLEARFIELD BANK & TRUST COMPANY

GARNISHEE(s)

To: The Prothonotary of Clearfield County

The Clearfield Bank & Trust Company, Garnishee, files answers to plaintiff's interrogatories as follows:

The answer to the Plaintiff's interrogatories #1 is YES

1A. Acct. # 12479063 \$95.05 Joint- David C. Renaud

126 SW 3rd Ave.

Clearfield, PA 16830

The answer to the Plaintiff's interrogatories #2 is NO

The answer to the Plaintiff's interrogatories #3 is NO

The answer to the Plaintiff's interrogatories #4 is NO

The answer to the Plaintiff's interrogatories #5 is NO

The answer to the Plaintiff's interrogatories #6 is NO

The answer to the Plaintiff's interrogatories #7 is NO

The answer to the Plaintiff's interrogatories #8 is NO

The answer to the Plaintiff's interrogatories #9 is YES

\$125.00 to Garnishee

Date August 6, 2008



Lori A. Kurtz
Assistant Vice President & Collection Manager
Clearfield Bank & Trust Company