

07-1479-CD
LVNV vs Teresa DeGrasse

944/88

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

LVNV Funding LLC
(Plaintiff)

CIVIL ACTION

c/o David J. Apothaker, Esq. No. 07-1479-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:

Teresa DeFrassse
(Defendant)

(Plaintiff/Defendant)

79 Lamb Dr
(Street Address)

Morrisdale PA 16858
(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 *Att'y pd.* 85.00
m/4/00/67
SEP 10 2011
100CSheriff

William A. Shaw
Prothonotary/Clerk of Courts

Our File No.: 94488
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

LVNV FUNDING, 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.)
TERESA DEGRASSE)
79 LAMB DR)
MORRISDALE, PA 16858-0061)
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 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.

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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

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

Plaintiff,

vs.

TERESA DEGRASSE
79 LAMB DR
MORRISDALE, PA 16858-0061

Defendant.

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

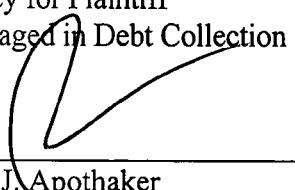
1. Plaintiff, LVNV FUNDING, LLC, is a company with its principal place of business located at c/o Apothaker & Associates, P.C., 2417 Welsh Road, Suite 21 #520, Philadelphia, PA 19114.
2. Defendant is TERESA DEGRASSE, an adult individual residing at 79 LAMB DR MORRISDALE, PA 16858-0061.
3. At the special instance and request of Defendant, Plaintiff sold and delivered to Defendant goods and/or services at the times, of the kinds, in the quantities, and for the prices set forth in Plaintiff's records. A true and correct copy of which is attached hereto, incorporated herein by reference and designated Exhibit "A".
4. Defendant received and accepted the goods and/or services described in Exhibit "A".
5. The prices set forth in Exhibit "A" are the fair, reasonable and market prices for said goods and/or services, and the prices which Defendant agreed to pay.
6. All credits, if any, to which Defendant is entitled, are set forth in Exhibit "A".
7. In addition, Plaintiff avers that Defendant has failed and continues to fail to make any payments, leaving a balance due and owing of \$8,572.47.

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

9. The original creditor is SEARS.

WHEREFORE, Plaintiff demands judgment in favor of Plaintiff and against Defendant(s) for the sum of \$8,572.47 plus costs, and reasonable attorney's fees.

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

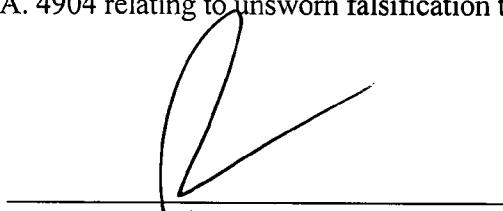
BY: 
David J. Apothaker

Dated: 8/30/2007

Our File No.: 94488

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 loop on the left and a straight line extending to the right.

David J. Apothaker
Attorney for Plaintiff

DATE: 8/30/2007

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

TERESA DEGRASSE
79 LAMB DR
MORRISDALE, PA 16858-0061

STATEMENT OF ACCOUNT

Debtor's Name: TERESA DEGRASSE
Account Number: 0554828196622
Original Creditor: SEARS
Balance Due: \$8,572.47

Our File No.: 94488

EXHIBIT "A"

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 1 of 1 Services

Sheriff Docket #

103188

LVNV FUNDING LLC

Case # 07-1479-CD

vs.

TERESA DEGRASSE

TYPE OF SERVICE COMPLAINT

SHERIFF RETURNS

NOW January 24, 2008 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT "NOT FOUND" AS TO TERESA DEGRASSE, DEFENDANT. MOVED, WHEREABOUTS UNKNOWN.

SERVED BY: /

Return Costs

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	APOTHAKER	58092G	10.00
SHERIFF HAWKINS	APOTHAKER	58092G	26.61

FILED

01/15/08 cm
JAN 25 2008

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before me This

So Answers,

____ Day of _____ 2008

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

94/88

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

LVNV Funding LLC
(Plaintiff)

CIVIL ACTION

c/o David J. Apotheker, Esq. No. 07-1479-CD
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2417 Welsh Road Suite 21 #520 Type of Case: civil
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Filed on Behalf of:

Teresa Defrasse
(Defendant)

Plaintiff/Defendant

79 LAMB DR
(Street Address)

MORRISDALE PA 16858
(City, State ZIP)

David J. Apotheker, Esquire
(Filed by)

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

(Address)

215-634-8920

(Phone)

(Signature)

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

SIP 10 2007

David J. Apotheker
David J. Apotheker
Clearfield County
Commonwealth of Pennsylvania

Our File No.: 94488
APÓTHAKER & 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

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Attorney I.D.#38423
2417 Welsh Road, Suite 21 #520
Philadelphia, PA 19114
(215) 634-8920
Attorneys for Plaintiff

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c/o Apothaker & Associates, P.C.) CLEARFIELD COUNTY
2417 Welsh Road, Suite 21 #520)
Philadelphia, PA 19114) NO.:
Plaintiff,)
vs.)
TERESA DEGRASSE)
79 LAMB DR)
MORRISDALE, PA 16858-0061)
Defendant.)

**CIVIL ACTION COMPLAINT
FIRST COUNT**

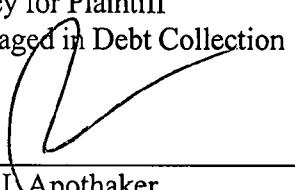
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Attorney for Plaintiff
A Law Firm Engaged in Debt Collection

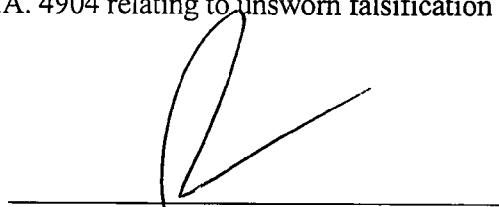
BY: 
David J. Apothaker

Dated: 8/30/2007

Our File No.: 94488

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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.

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David J. Apothaker
Attorney for Plaintiff

DATE: 8/30/2007

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

TERESA DEGRASSE
79 LAMB DR
MORRISDALE, PA 16858-0061

STATEMENT OF ACCOUNT

Debtor's Name: TERESA DEGRASSE
Account Number: 0554828196622
Original Creditor: SEARS
Balance Due: \$8,572.47

Our File No.: 94488

EXHIBIT "A"

Notice of Proposed Termination of Court Case

January 26, 2012

RE: 2007-01479-CD

LVNV Funding, LLC

Vs.

Teresa DeGrasse

FILED

B&D JAN 26 2012

Boyle William A. Shaw
Prothonotary/Clerk of Courts

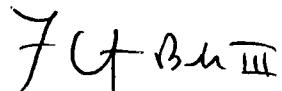
To All Parties and Counsel:

Please be advised that the Court intends to terminate the above captioned case without notice, because the Court records show no activity in the case for a period of at least two years.

You may stop the Court terminating the case by filing a Statement of Intention to Proceed. The Statement of Intention to Proceed must be filed with the Prothonotary of Clearfield County, PO Box 549, Clearfield, Pennsylvania 16830. The Statement of Intention to Proceed must be filed on or before March 28, 2012.

If you fail to file the required statement of intention to proceed within the required time period, the case will be terminated.

By the Court,



F. Cortez Bell, III, Esq.
Court Administrator

Our File No.: 94488
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

FILED NO
mtholad CC
FEB 27 2012

William A. Shaw
Prothonotary/Clark of Courts GK

LVNV FUNDING, LLC) COURT OF COMMON PLEAS
Plaintiff,) CLEARFIELD COUNTY
vs.)
TERESA DEGRASSE) NO. 07-1479-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, Esquire

Dated: 2/14/2012

