

07-1772-CD  
LVNV vs Emanine Adams

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

LVNV FUNDING, LLC ASSIGNEE OF SHERMAN  
ACQUISITION ASSIGNEE OF SEARS

No. 07-1772-CD

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

Plaintiff

Type of Case: Contract

VS.

EMALINE ADAMS  
6 ARMINTA ST  
DU BOIS PA 15801

Type of Pleading:

Filed on Behalf of: Plaintiff

Defendant(s)

Date: 10/29/07

  
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 / Ronald S. Canter #94000  
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/1/05/07 NOV 01 2007  
100CC 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 : No.  
ASSIGNEE OF SEARS :  
Plaintiff :  
vs : CIVIL ACTION - LAW  
EMALINE ADAMS :  
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

LVNV FUNDING, LLC : No.  
ASSIGNEE OF SHERMAN ACQUISITION :  
ASSIGNEE OF SEARS :  
Plaintiff :  
vs : CIVIL ACTION - LAW  
EMALINE ADAMS :  
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. Meholick, Court Administrator 230 East Market Street  
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814-765-2641

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

|                                 |   |                    |
|---------------------------------|---|--------------------|
| LVNV FUNDING, LLC               | : |                    |
| ASSIGNEE OF SHERMAN ACQUISITION | : | No.                |
| ASSIGNEE OF SEARS               | : |                    |
| Plaintiff                       | : |                    |
| vs                              | : |                    |
| EMALINE ADAMS                   | : |                    |
| Defendant(s)                    | : | CIVIL ACTION - LAW |

**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, EMALINE ADAMS, is an adult individual with a last known address of 6 Arminta St Du Bois, Clearfield County, PA 15801.
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 \$8,236.47.

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 \$1,058.78.

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.

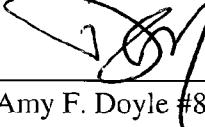
11. Plaintiff performed any and all conditions precedent to the bringing of this action.

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 \$8,236.47, plus interest in the amount of \$1,058.78, plus costs of this action and any other relief as this Court deems just and reasonable.

Respectfully Submitted,

Date: 10/29/07

  
\_\_\_\_\_  
Amy F. Doyle #87062 / Daniel E. Wolfson #20617  
Philip C. Warholic #86341 / David R. Galloway #87326  
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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: 10/29/07

  
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4660 Trindle Road, Suite 300  
Camp Hill, PA 17011  
Telephone: (717) 303-6700  
Counsel for Plaintiff

**Exhibit "A"**

ACCT#5121075002923691      BAL 8236.47      LPYMT DT 09/02/2005  
\*ABL-ACCT-ID\*ABL-ACCT-NO      \*ABL-EFF-DATE\*ABL-CUR-BALANCE  
07/19/2007      8236.47  
\*ABL-PRIN-COLLECTED\*ABL-PRIN-OWING\*ABL-PRIN-BAL\*ABL-ATTYFEE-COLLECTED  
0.00      8236.47      8236.47      0.00  
\*ABL-ATTYFEE-OWING\*ABL-FEE-BAL\*ABL-INT-COLLECTED\*ABL-INT-OWING\*ABL-INT-BAL  
0.00      0.00      0.00      0.00      0.00  
\*ABL-COST-COLLECTED\*ABL-COST-OWING\*ABL-COST-BAL\*ABL-CUR-INT-RATE\*ABL-INT-ACCRUAL  
0.00      0.00      0.00      0.059      1.35  
\*ABL-SUSPEND-INT\*ABL-LAST-PYMT-DT\*ABL-LAST-PYMT-AMT\*ABL-LAST-NSF-DT  
0.00      09/02/2005      100.00  
\*ABL-LAST-NSF-AMT\*ABL-ACCRUAL-METHOD\*PLA-ACCT-ID\*PLA-ACCT-NO  
2

--  
\*ADL-ACCT-NO      \*ADL-MERCHANT      \*ADL-CBR  
Y

\*ADL-CHGOFF-BAL\*ADL-CHGOFF-DT\*ADL-ORG-NAME  
8236.47      02/04/2006      LVNV FUNDING LLC  
\*ADL-LAST-PURCH-AMT\*ADL-MISC1  
0.00  
\*ADL-MISC2  
\*ADL-MISC3

\*ADL-SELLER-NAME      \*ADL-ORG-DT\*ADL-PORTFOLIO-ID  
SEARS      03/13/2002 6280  
\*ADL-TELECOMM-PHONE\*ALT-ACCT-ID

--  
\*BWR-TYPE\*BWR-SSN      \*BWR-FIR-NAME  
01      XXXXX8898 EMALINE

\*BWR-LAST-NAME  
ADAMS

\*BWR-ADDR  
6 ARMINTA ST  
\*BWR-ADDR2      \*BWR-CITY      \*BWR-ST\*BWR-ZIP  
DU BOIS      PA      158011438  
\*BWR-DOB      \*BWR-HMPHONE\*BWR-WKPHONE\*BWR-OTPHONE\*BWR-LANG-CODE  
8143713135      0  
\*BWR-BANK-NAME      \*BWR-EMPLOYED\*BWR-HOME-OWNER  
N

--  
\*PLA-COMM-RATE\*PLA-BATCH-ID\*PLA-TRUST-ACCTID\*PLA-DEADLINE\*PLA-SIF\*BKY-ACCT-ID  
0.270      96807      1

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

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

No. 07-1772-CD  
CIVIL ACTION - LAW

VS

EMALINE ADAMS  
Defendant(s)

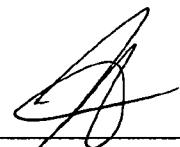
**PRAECLPICE TO DISCONTINUE**

To the Prothonotary:

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

Respectfully Submitted,

Date: 11/13/07

  
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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Attorneys in the Practice of Debt Collection  
4660 Trindle Road, Suite 300  
Camp Hill, PA 17011  
Telephone: (717) 303-6700  
Counsel for Plaintiff

**FILED** *1cc & 1 Cert of  
m 11:20am disc issued to  
NOV 28 2007 Atty*  
*LM*

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. 07-1772-CD

CIVIL ACTION - LAW

vs.

EMALINE ADAMS  
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 16<sup>th</sup> day of November, 2007

EMALINE ADAMS  
6 ARMINTA ST  
DU BOIS, PA 15801



---

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

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

*COPY*

CIVIL DIVISION

**LVNV Funding, LLC  
Sherman Acquisition, LP  
Sears**

Vs. **No. 2007-01772-CD**  
**Emaline Adams**

**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 November 28, 2007, marked:

Discontinued without prejudice

Record costs in the sum of \$85.00 have been paid in full by David R. Galloway Esq.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 28th day of November A.D. 2007.

*William A. Shaw* cm  
William A. Shaw, Prothonotary

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 1 of 1 Services

Sheriff Docket # **103380**

LVNV FUNDING, LLC ASSIGNEE

Case # 07-1772-CD

vs.

EMALINE ADAMS

TYPE OF SERVICE COMPLAINT

**SHERIFF RETURNS**

NOW February 15, 2008 RETURNED THE WITHIN COMPLAINT "NOT SERVED" AS TO EMALINE ADAMS, DEFENDANT. DEFENDANT IN NURSING HOME ATTY STATED DO NOT SERVE

SERVED BY: /

**Return Costs**

| PURPOSE         | VENDOR  | CHECK # | AMOUNT |
|-----------------|---------|---------|--------|
| SURCHARGE       | WOLPOFF | 233089  | 10.00  |
| SHERIFF HAWKINS | WOLPOFF | 233089  | 51.27  |

**FILED**  
0/3:00 AM  
FEB 15 2008  
WM

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

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY  
PENNSYLVANIA

LVNV FUNDING, LLC ASSIGNEE OF SHERMAN  
ACQUISITION ASSIGNEE OF SEARS

No. 07-1772-CD

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

Plaintiff

Type of Case: Contract

VS.

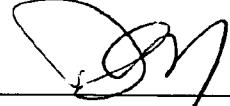
EMALINE ADAMS  
6 ARMINTA ST  
DU BOIS PA 15801

Type of Pleading:

Filed on Behalf of: Plaintiff

Defendant(s)

Date: 10/29/07

  
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Attorneys in the Practice of Debt Collection  
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Camp Hill, PA 17011  
Telephone: (717) 303-6700  
Counsel for Plaintiff

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

NOV 01 2007

Attest.

  
William L. Schaeffer  
Prothonotary/  
Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

LVNV FUNDING, LLC :  
ASSIGNEE OF SHERMAN ACQUISITION : No.  
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Plaintiff :  
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|---------------------------------|---|--------------------|
| LVNV FUNDING, LLC               | : |                    |
| ASSIGNEE OF SHERMAN ACQUISITION | : | No.                |
| ASSIGNEE OF SEARS               | : |                    |
| Plaintiff                       | : |                    |
| vs                              | : | CIVIL ACTION - LAW |
| EMALINE ADAMS                   | : |                    |
| Defendant(s)                    | : |                    |

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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

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| Plaintiff                       | : |                    |
| vs                              | : | CIVIL ACTION - LAW |
| EMALINE ADAMS                   | : |                    |
| 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, EMALINE ADAMS, is an adult individual with a last known address of 6 Arminta St Du Bois, Clearfield County, PA 15801.
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 \$8,236.47.

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 \$1,058.78.

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.

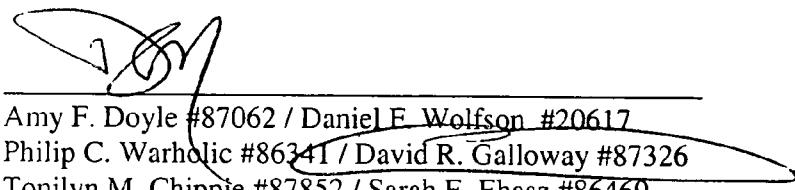
11. Plaintiff performed any and all conditions precedent to the bringing of this action.

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 \$8,236.47, plus interest in the amount of \$1,058.78, plus costs of this action and any other relief as this Court deems just and reasonable.

Respectfully Submitted,

Date: 10/20/07

  
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Counsel for Plaintiff

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Counsel for Plaintiff

# **Exhibit "A"**

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0.00      8236.47      8236.47      0.00  
\*ABL-ATTYFEE-OWING\*ABL-FEE-BAL\*ABL-INT-COLLECTED\*ABL-INT-OWING\*ABL-INT-BAL  
0.00      0.00      0.00      0.00      0.00  
\*ABL-COST-COLLECTED\*ABL-COST-OWING\*ABL-COST-BAL\*ABL-CUR-INT-RATE\*ABL-INT-ACCRUAL  
0.00      0.00      0.00      0.059      1.35  
\*ABL-SUSPEND-INT\*ABL-LAST-PYMT-DT\*ABL-LAST-PYMT-AMT\*ABL-LAST-NSF-DT  
0.00      09/02/2005      100.00  
\*ABL-LAST-NSF-AMT\*ABL-ACCRUAL-METHOD\*PLA-ACCT-ID\*PLA-ACCT-NO  
2

--  
\*ADL-ACCT-NO      \*ADL-MERCHANT      \*ADL-CBR  
Y

\*ADL-CHGOFF-BAL\*ADL-CHGOFF-DT\*ADL-ORG-NAME  
8236.47      02/04/2006      LVNV FUNDING LLC  
\*ADL-LAST-PURCH-AMT\*ADL-MISC1  
0.00  
\*ADL-MISC2  
\*ADL-MISC3      \*ADL-ORG-DT\*ADL-PORTFOLIO-ID  
03/13/2002 6280  
\*ADL-SELLER-NAME      \*ADL-TELECOMM-PHONE\*ALT-ACCT-ID  
SEARS

--  
\*BWR-TYPE\*BWR-SSN      \*BWR-FIR-NAME  
01      XXXXX8898 EMALINE  
\*BWR-LAST-NAME  
ADAMS  
\*BWR-ADDR  
6 ARMINA ST  
\*BWR-ADDR2      \*BWR-CITY      \*BWR-ST\*BWR-ZIP  
DU BOIS      PA      158011438  
\*BWR-DOB      \*BWR-HMPHONE\*BWR-WKPHONE\*BWR-OTPHONE\*BWR-LANG-CODE  
8143713135      0  
\*BWR-BANK-NAME      \*BWR-EMPLOYED\*BWR-HOME-OWNER  
N

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\*PLA-COMM-RATE\*PLA-BATCH-ID\*PLA-TRUST-ACCTID\*PLA-DEADLINE\*PLA-SIF\*BKY-ACCT-ID  
0.270      96807      1