

102812

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

LUNV Funding LLC
(Plaintiff)

CIVIL ACTION

c/o 2417 Welsh Road Suite 21 #520
(Street Address)

No. 07-1916-CD

Phila., PA 19114

(City, State ZIP)

Type of Case: civil COMPLAINT

Type of Pleading: _____

VS.

Filed on Behalf of:

JAMES A WILSON
(Defendant)

(Plaintiff/Defendant)

20 Tower Ln Apt D
(Street Address)

Du Bois, PA 15801
(City, State ZIP)

David J. Apothaker, Esquire

(Filed by)

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

(Address)

215-634-8920

(Phone)

FILED Att'y pd. 85.00
m/2:14/20
NOV 26 2007 ICE Sheriff

William A. Shaw
Prothonotary/Clerk of Courts

(Signature)

CLEARFIELD COUNTY BAR ASSOCIATION
Lawyer Referral and Information Service
814-765-2641

APOTHAKE & 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.)	
)	
JAMES A WILSON)	
20 TOWER LN APT D)	
DU BOIS, PA 15801)	
Defendant.)	
)	

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 JAMES A WILSON, an adult individual residing at 20 TOWER LN APT D DU BOIS, PA 15801.
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 \$5,072.92.

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 \$5,072.92 and requests this Court award Plaintiff attorney's fees and costs to the extent permitted by applicable law.

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

BY: _____

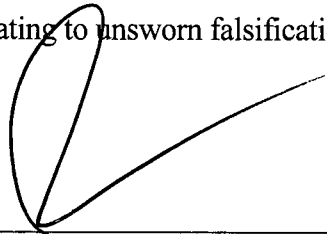
David S. Apothaker

Dated: 11/12/2007

Our File No.: 102812

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, consisting of a large, stylized 'D' followed by a long, sweeping horizontal stroke.

David J. Apothaker
Attorney for Plaintiff

DATE: 11/12/2007

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

JAMES A WILSON
20 TOWER LN APT D
DU BOIS, PA 15801

STATEMENT OF ACCOUNT

Debtor's Name:	JAMES A WILSON
Account Number:	0554636145118
Original Creditor:	SEARS
Balance Due:	\$5,072.92

Our File No.: 102812

EXHIBIT "A"

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 1 of 1 Services

Sheriff Docket # **103474**

LVNV FUNDING LLC

Case # 07-1916-CD

vs.

JAMES A. WILSON

TYPE OF SERVICE COMPLAINT

SHERIFF RETURNS

NOW April 11, 2008 RETURNED THE WITHIN COMPLAINT "NOT SERVED, TIME EXPIRED" AS TO JAMES A. WILSON, DEFENDANT. DOESN'T LIVE @ 20 TOWER LN. APT D or 212 S. MAIN ST., DUBOIS, PA.

DEFENDANT PHONE # 371-4296

SERVED BY: /

Return Costs

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	APOTHAKE	65520	10.00
SHERIFF HAWKINS	APOTHAKE	6520	50.86

FILED

0/1:35 am
APR 11 2008

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before me This

_____ Day of _____ 2008

So Answers,


Chester A. Hawkins
Sheriff

102812
COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

LUNV Funding LLC
(Plaintiff)

CIVIL ACTION

c/o 2417 Welsh Road Suite 21 #520
(Street Address)

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Phila., PA 19114
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Filed on Behalf of:

JAMES A WILSON
(Defendant)

(Plaintiff/Defendant)

20 Tower Ln Apt D
(Street Address)

Du Bois, PA 15801
(City, State ZIP)

David J. Apothaker, Esquire

(Filed by)

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

(Address)

215-634-8920

(Phone)

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

(Signature)

NOV 26 2007

Attest.

William L. Brown
Prothonotary/
Clerk of Courts

CLEARFIELD COUNTY BAR ASSOCIATION
Lawyer Referral and Information Service
814-765-2641

APOTHAKE & 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.

JAMES A WILSON
20 TOWER LN APT D
DU BOIS, PA 15801

Defendant.

) COURT OF COMMON PLEAS
) CLEARFIELD COUNTY

) NO.:

CIVIL ACTION COMPLAINT
FIRST COUNT

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4. Defendant received and accepted the goods and/or services described in Exhibit "A".
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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 \$5,072.92.

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 \$5,072.92 and requests this Court award Plaintiff attorney's fees and costs to the extent permitted by applicable law.

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

BY: _____

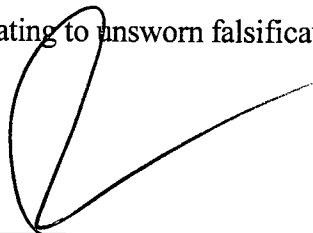
David J. Apothaker

Dated: 11/12/2007

Our File No.: 102812

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.

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David J. Apothaker
Attorney for Plaintiff

DATE: 11/12/2007

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

JAMES A WILSON
20 TOWER LN APT D
DU BOIS, PA 15801

STATEMENT OF ACCOUNT

Debtor's Name:	JAMES A WILSON
Account Number:	0554636145118
Original Creditor:	SEARS
Balance Due:	\$5,072.92

Our File No.: 102812

EXHIBIT "A"

Our File No.: 102812
APOTHAKE & ASSOCIATES, P.C.
BY: Benjamin J. Cavallaro, Esquire
Attorney I.D.# 307949
520 Fellowship Road C306
Mount Laurel, NJ 08054
(800) 672-0215
Attorney for Plaintiff

FILED NO CC
JUL 05 2011
6k

LVNV FUNDING, LLC

Plaintiff,

vs.

JAMES A WILSON

Defendant.

) COURT OF COMMON PLEAS William A. Shaw
) CLEARFIELD COUNTY Prothonotary/Clerk of Courts

) NO. 07-1916-CD
)
)
)
)
)

PRAECIPE TO DISMISS WITHOUT PREJUDICE

TO THE PROTHONOTARY:

Kindly dismiss this action without prejudice.

APOTHAKE & ASSOCIATES, P.C.
Attorneys for Plaintiff
A Law Firm Engaged in Debt Collection

By: 
Benjamin J. Cavallaro, Esquire

Dated: 6/29/2011



* Q 1 0 2 8 1 2 D I S N 1 - *