

07-1917-CD

GE Money vs Robert Vaughan et al

Commonwealth of Pennsylvania

Court of Common Pleas  
CLEARFIELD

Judicial District

NOTICE OF APPEAL

FROM

DISTRICT JUSTICE JUDGMENT

COMMON PLEAS NO.

07-1917-CD

NOTICE OF APPEAL

Notice is given that the appellant has filed in the above Court of Common Pleas and appeal from the judgment rendered by the District Justice on the Date and in the case mentioned below.

Name of Appellant  
ROBERT & MICHELLE VAUGHAN

Mag. Dit. No. or Name of DJ.  
46-3-01

Address of Appellant  
643 TREASURE AVENUE

City  
DUBOIS

State  
PA

Zip Code  
15801

Date of Judgment  
11/05/07

In the case of  
(plaintiff) GE M ONEY BANK

(Defendant) ROBERT & MICHELLE VAUGHAN

Claim Number.  
CV-0000524-07

Signature of Appellant or His Attorney of Agent  
Leah M. Stump, Esquire  
(717) 692-5533

TA 19  
LT 19

This block will be signed ONLY when this notation is required under Pa. R.C.P.J.P. No. 1008B.

If appellant was Claimant (see Pa.R.C.P.J.P. No. 1001(6) in action before District Justice, he MUST FILE A COMPLAINT within twenty (20) days after filing his NOTICE OF APPEAL.

This Notice of Appeal, when received by the District Justice, will operate as a SUPERSEDEAS to Judgment for possession in this case.

Signature of Prothonotary or Deputy

PRAECIPE TO ENTER RULE TO FILE COMPLAINT AND RULE TO FILE

(This section of the form to be used ONLY when appellant was DEFENDANT (see Pa.R.C.P.J.P. No. 1001(7) in the action before District Justice. IF NOT USED, detach from copy of notice of appeal to be served upon Appellee).

PRAECIPE: To Prothonotary

Enter rule upon GE MONEY BANK, Appellee(s) to file a complaint in this appeal  
Name of Appellee(s)

(Common Pleas No. 07-1917-CD) within twenty (20) days after service of rule or suffer entry of judgment of non pros.

Signature of Appellant or His Attorney of Agent

RULE: To GE MONEY BANK, Appellee(s)  
Name of Appellee(s)

- (1) You are notified that a rule is hereby entered upon you to file a complaint in this appeal within twenty (20) days after date of service of this rule upon you by personal service or by certified or registered mail.
- (2) If you do not file a complaint within this time, a JUDGMENT NON PROS WILL BE ENTERED AGAINST YOU.
- (3) The date of service of this rule is service was by mail is the date of mailing.

Date: November 26, 2007

Signature of Prothonotary or Deputy

FILED  
m13:00BD  
NOV 26 2007  
William A. Shaw  
Prothonotary/Clerk of Courts  
1cc - Atty Stump  
PST  
DJ Ford

AOPC 315-07

11/06/07

8:30:00 AM

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: **CLEARFIELD**NOTICE OF JUDGMENT/TRANSCRIPT  
CIVIL CASE

Mag. Dist. No.:	<b>46-3-01</b>
MDJ Name: Hon.	<b>PATRICK N. FORD</b>
Address:	<b>309 MAPLE AVENUE PO BOX 452 DUBOIS, PA 15801</b>
Telephone:	<b>(814) 371-5321 15801</b>

PLAINTIFF: **GE MONEY BANK**  
**4660 TRINLE ROAD APT/STE 300**  
**WOLFOFF & ABRAMSON**  
**CAMP HILL, PA 17011**

VS.

DEFENDANT: **VAUGHAN, ROBERT, ET AL.**  
**643 TREASURE LAKE**  
**DUBOIS, PA 15801**

**ROBERT VAUGHAN**  
**643 TREASURE LAKE**  
**DUBOIS, PA 15801**

Docket No.: **CV-0000524-07**  
Date Filed: **10/01/07**



## THIS IS TO NOTIFY YOU THAT:

Judgment: **DEFAULT JUDGMENT PLTF** (Date of Judgment) **11/05/07**

- ☒ Judgment was entered for: (Name) **GE MONEY BANK**
- ☒ Judgment was entered against: (Name) **VAUGHAN, ROBERT**  
In the amount of \$ **1,293.62**

- ☐ Defendants are jointly and severally liable.
- ☐ Damages will be assessed on Date & Time
- ☐ This case dismissed without prejudice.
- ☐ Amount of Judgment Subject to Attachment/42 Pa.C.S. § 8127  
\$
- ☐ Portion of Judgment for physical damages arising out of  
residential lease \$

Amount of Judgment	\$ <b>1,206.12</b>
Judgment Costs	\$ <b>87.50</b>
Interest on Judgment	\$ <b>.00</b>
Attorney Fees	\$ <b>.00</b>
<b>Total</b>	<b>\$ 1,293.62</b>
Post Judgment Credits	\$
Post Judgment Costs	\$
<b>Certified Judgment Total</b>	<b>\$</b>

ANY PARTY HAS THE RIGHT TO APPEAL WITHIN 30 DAYS AFTER THE ENTRY OF JUDGMENT BY FILING A NOTICE OF APPEAL WITH THE PROTHONOTARY/CLERK OF THE COURT OF COMMON PLEAS, CIVIL DIVISION. YOU MUST INCLUDE A COPY OF THIS NOTICE OF JUDGMENT/TRANSCRIPT FORM WITH YOUR NOTICE OF APPEAL.

EXCEPT AS OTHERWISE PROVIDED IN THE RULES OF CIVIL PROCEDURE FOR MAGISTERIAL DISTRICT JUDGES, IF THE JUDGMENT HOLDER ELECTS TO ENTER THE JUDGMENT IN THE COURT OF COMMON PLEAS, ALL FURTHER PROCESS MUST COME FROM THE COURT OF COMMON PLEAS AND NO FURTHER PROCESS MAY BE ISSUED BY THE MAGISTERIAL DISTRICT JUDGE. UNLESS THE JUDGMENT IS ENTERED IN THE COURT OF COMMON PLEAS, ANYONE INTERESTED IN THE JUDGMENT MAY FILE A REQUEST FOR ENTRY OF SATISFACTION WITH THE MAGISTERIAL DISTRICT JUDGE IF THE JUDGMENT DEBTOR PAYS IN FULL, SETTLES, OR OTHERWISE COMPLIES WITH THE JUDGMENT.

**11-5-07** Date **Patrick N. Ford - PAF**, Magisterial District Judge

I certify that this is a true and correct copy of the record of the proceedings containing the judgment.

Mag. Dist. No.: **46-3-01**  
MDJ Name: Hon. **PATRICK N. FORD**  
Address: **309 MAPLE AVENUE  
PO BOX 452  
DUBOIS, PA  
15801**  
Telephone: **(814) 371-5321**

PLAINTIFF: **GE MONEY BANK**  
**4660 TRINLE ROAD APT/STE 300  
WOLPOFF & ABRAMSON  
CAMP HILL, PA 17011**  
VS.  
DEFENDANT: **VAUGHAN, ROBERT, ET AL.**  
**643 TREASURE LAKE  
DUBOIS, PA 15801** 2007-1917-C0

**PATRICK N. FORD  
309 MAPLE AVENUE  
PO BOX 452  
DUBOIS, PA 15801**

**FILED**  
DEC 05 2007  
m/10:45/2  
William A. Shaw  
Prothonotary/Clerk of Courts

Docket No.: **CV-0000524-07**  
Date Filed: **10/01/07**



**THIS IS TO NOTIFY YOU THAT:**

Judgment: **DEFAULT JUDGMENT PLTF** (Date of Judgment) **11/05/07**

☒ Judgment was entered for: (Name) **GE MONEY BANK**

☒ Judgment was entered against: (Name) **VAUGHAN, ROBERT**  
in the amount of \$ **1,293.62**

☐ Defendants are jointly and severally liable.

☐ Damages will be assessed on Date & Time \_\_\_\_\_

☐ This case dismissed without prejudice.

☐ Amount of Judgment Subject to Attachment/42 Pa.C.S. § 8127  
\$ \_\_\_\_\_

☐ Portion of Judgment for physical damages arising out of  
residential lease \$ \_\_\_\_\_

Amount of Judgment	\$ <b>1,206.12</b>
Judgment Costs	\$ <b>87.50</b>
Interest on Judgment	\$ <b>.00</b>
Attorney Fees	\$ <b>.00</b>
<b>Total</b>	\$ <b>1,293.62</b>
Post Judgment Credits	\$ _____
Post Judgment Costs	\$ _____
<b>Certified Judgment Total</b>	\$ _____

ANY PARTY HAS THE RIGHT TO APPEAL WITHIN 30 DAYS AFTER THE ENTRY OF JUDGMENT BY FILING A NOTICE OF APPEAL WITH THE PROTHONOTARY/CLERK OF THE COURT OF COMMON PLEAS, CIVIL DIVISION. YOU MUST INCLUDE A COPY OF THIS NOTICE OF JUDGMENT/TRANSCRIPT FORM WITH YOUR NOTICE OF APPEAL.

EXCEPT AS OTHERWISE PROVIDED IN THE RULES OF CIVIL PROCEDURE FOR MAGISTERIAL DISTRICT JUDGES, IF THE JUDGMENT HOLDER ELECTS TO ENTER THE JUDGMENT IN THE COURT OF COMMON PLEAS, ALL FURTHER PROCESS MUST COME FROM THE COURT OF COMMON PLEAS AND NO FURTHER PROCESS MAY BE ISSUED BY THE MAGISTERIAL DISTRICT JUDGE.

UNLESS THE JUDGMENT IS ENTERED IN THE COURT OF COMMON PLEAS, ANYONE INTERESTED IN THE JUDGMENT MAY FILE A REQUEST FOR ENTRY OF SATISFACTION WITH THE MAGISTERIAL DISTRICT JUDGE IF THE JUDGMENT DEBTOR PAYS IN FULL, SETTLES, OR OTHERWISE COMPLIES WITH THE JUDGMENT.

11-5-07 Date Patrick N. Ford - PNF, Magisterial District Judge

I certify that this is a true and correct copy of the record of the proceedings containing the judgment.  
\_\_\_\_\_, Date \_\_\_\_\_, Magisterial District Judge

My commission expires first Monday of January, **2012**

SEAL

**NOTICE OF JUDGMENT/TRANSCRIPT  
CIVIL CASE**

Mag. Dist. No.: **46-3-01**  
MDJ Name: Hon. **PATRICK N. FORD**  
Address: **309 MAPLE AVENUE  
PO BOX 452  
DUBOIS, PA  
15801**  
Telephone: **(814) 371-5321 15801**

PLAINTIFF: **GE MONEY BANK**  
NAME and ADDRESS  
**4660 TRINLE ROAD APT/STE 300  
WOLPOFF & ABRAMSON  
CAMP HILL, PA 17011**  
VS.  
DEFENDANT: **VAUGHAN, ROBERT, ET AL.**  
NAME and ADDRESS  
**643 TREASURE LAKE  
DUBOIS, PA 15801**

**PATRICK N. FORD  
309 MAPLE AVENUE  
PO BOX 452  
DUBOIS, PA 15801**

Docket No.: **CV-0000524-07**  
Date Filed: **10/01/07**



**THIS IS TO NOTIFY YOU THAT:**

Judgment: **DEFAULT JUDGMENT PLTF** (Date of Judgment) **11/05/07**

- ☒ Judgment was entered for: (Name) **GE MONEY BANK**  
☒ Judgment was entered against: (Name) **VAUGHAN, MICHELLE D**  
in the amount of \$ **1,293.62**

- ☐ Defendants are jointly and severally liable.  
☐ Damages will be assessed on Date & Time \_\_\_\_\_  
☐ This case dismissed without prejudice.  
☐ Amount of Judgment Subject to Attachment/42 Pa.C.S. § 8127  
\$ \_\_\_\_\_  
☐ Portion of Judgment for physical damages arising out of  
residential lease \$ \_\_\_\_\_

Amount of Judgment	\$ <b>1,206.12</b>
Judgment Costs	\$ <b>87.50</b>
Interest on Judgment	\$ <b>.00</b>
Attorney Fees	\$ <b>.00</b>
<b>Total</b>	<b>\$ 1,293.62</b>
Post Judgment Credits	\$ _____
Post Judgment Costs	\$ _____
<b>Certified Judgment Total</b>	<b>\$ _____</b>

ANY PARTY HAS THE RIGHT TO APPEAL WITHIN 30 DAYS AFTER THE ENTRY OF JUDGMENT BY FILING A NOTICE OF APPEAL WITH THE PROTHONOTARY/CLERK OF THE COURT OF COMMON PLEAS, CIVIL DIVISION. YOU MUST INCLUDE A COPY OF THIS NOTICE OF JUDGMENT/TRANSCRIPT FORM WITH YOUR NOTICE OF APPEAL.

EXCEPT AS OTHERWISE PROVIDED IN THE RULES OF CIVIL PROCEDURE FOR MAGISTERIAL DISTRICT JUDGES, IF THE JUDGMENT HOLDER ELECTS TO ENTER THE JUDGMENT IN THE COURT OF COMMON PLEAS, ALL FURTHER PROCESS MUST COME FROM THE COURT OF COMMON PLEAS AND NO FURTHER PROCESS MAY BE ISSUED BY THE MAGISTERIAL DISTRICT JUDGE.

UNLESS THE JUDGMENT IS ENTERED IN THE COURT OF COMMON PLEAS, ANYONE INTERESTED IN THE JUDGMENT MAY FILE A REQUEST FOR ENTRY OF SATISFACTION WITH THE MAGISTERIAL DISTRICT JUDGE IF THE JUDGMENT DEBTOR PAYS IN FULL, SETTLES, OR OTHERWISE COMPLIES WITH THE JUDGMENT.

11-5-07 Date Patrick N. Ford-bnf, Magisterial District Judge

I certify that this is a true and correct copy of the record of the proceedings containing the judgment.  
\_\_\_\_ Date \_\_\_\_\_, Magisterial District Judge

My commission expires first Monday of January, **2012**

SEAL

# CIVIL COMPLAINT

Magisterial District Number: 46-3-01

MDJ Name: HONORABLE PATRICK N. FORD

Address: 309 MAPLE AVENUE  
P.O. BOX 452  
DUBOIS PA 15801  
Telephone: (814) 371-5321

PLAINTIFF:

NAME and ADDRESS

GE MONEY BANK  
c/o WOLPOFF & ABRAMSON, L.L.P.  
4660 TRINDLE ROAD, SUITE 300  
CAMP HILL, PA 17011

DEFENDANT:

NAME and ADDRESS

ROBERT VAUGHAN  
643 TREASURE LK  
DU BOIS PA 15801  
no phone number available  
MICHELLE D VAUGHAN  
643 TREASURE LK  
DU BOIS PA 15801-0000  
no phone number available

Docket No.: CV-324-07

Date Filed: 10-1-07



	AMOUNT	DATE PAID
FILING COSTS	\$ <u>87.50</u>	<u>10-1-07</u>
POSTAGE	\$ _____	_____
SERVICE COSTS	\$ _____	_____
CONSTABLE ED.	\$ _____	_____
TOTAL	\$ _____	_____

Pa.R.C.P.D.J. No. 206 sets forth those costs recoverable by the prevailing party.

**TO THE DEFENDANT:** The above named plaintiff(s) asks judgment against you for \$1,206.12 together with costs upon the following claim (Civil fines must include citation of the statute or ordinance violated):

Plaintiff issued a revolving credit account to Defendant which was subject to terms and conditions as outlined and agreed upon by Defendant, which included, but were not limited to, interest and all court and collection costs in the event of default in payment.

Defendant utilized said revolving credit account to obtain extensions of credit which Defendant used for the purchase of products, goods and/or for obtaining services from Plaintiff and subsequently incurred a delinquent balance due and owing in the amount of \$1,206.12. Despite Plaintiff's reasonable and repeated demands for payment, Defendant has failed, refused and continues to refuse to pay all sums due and owing on Defendant's account balance, all to the damage and detriment of Plaintiff. To date, the balance due, owing and unpaid on Defendant's account with Plaintiff is \$1,206.12.

Wherefore, Plaintiff respectfully requests this Honorable Court enter judgment in favor of Plaintiff and against Defendant in the amount of \$1,206.12 plus the costs of this action, and such other relief as the Court deems just and proper.

The undersigned hereby verifies that the facts set forth in this complaint are true and correct to the best of my knowledge, information, and belief. This statement is made subject to the penalties of Section 4904 of the Crimes Code (18 PA. C.S. § 4904) related to unsworn falsification to authorities.

AMY F. DOYLE, ESQ. #87062 / DANIEL F. WOLESON, ESQ.  
#20617 / PHILIP C. WARHOLIC, ESQ. #86341 / DAVID R.  
GALLOWAY, ESQ. #87326 / TONILYN M. CHIPPIE, ESQ. #87852  
/ SARAH E. EHASZ, ESQ. #86469 / ROBERT N. POLAS, JR., ESQ.  
#201259 / RONALD S. CANTER, ESQ. #94000

Plaintiff's  
Attorney:

Telephone: (717) 303-6700

(Signature of Plaintiff or Authorized Agent)

Address: 4660 Trindle Road, Suite 300  
Camp Hill, PA 17011

**IF YOU INTEND TO ENTER A DEFENSE TO THIS COMPLAINT, YOU SHOULD SO NOTIFY THIS OFFICE IMMEDIATELY AT THE ABOVE TELEPHONE NUMBER. YOU MUST APPEAR AT THE HEARING AND PRESENT YOUR DEFENSE. UNLESS YOU DO, JUDGMENT MAY BE ENTERED AGAINST YOU BY DEFAULT.**

If you have a claim against the plaintiff which is within magisterial district judge jurisdiction and which you intend to assert at the hearing, you must file it on a complaint form at this office at least five (5) days before the date set for the hearing.

If you are disabled and require a reasonable accommodation to gain access to the Magisterial District Court and its services, please contact the Magisterial District Court at the above address or telephone number. We are unable to provide transportation.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

GE MONEY BANK  
4125 WINDWARD PLAZA DRIVE  
ALPHARETTA GA 30005  
Plaintiff

VS

ROBERT VAUGHAN  
643 TREASURE LK  
DU BOIS PA 15801

MICHELLE D VAUGHAN  
643 TREASURE LK  
DU BOIS PA 15801-0000  
Defendant(s)

: No. 07-1917-CD

: CIVIL ACTION - LAW

FILED

JAN 31 2008

PM 11:50/WN  
William A. Shaw  
Prothonotary/Clerk of Courts

2 Cent to ATT

Filed on behalf of:

Plaintiff, GE MONEY BANK

Counsel of record for this party:

Date: 1/25/08

Philip C. Warholick  
Amy F. Doyle #87062 / Daniel F. Wolfson #20617  
Philip C. Warholick #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

GE MONEY BANK

Plaintiff

vs

ROBERT VAUGHAN

MICHELLE D VAUGHAN

Defendant(s)

:  
: No. 07-1917-CD  
:

: 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

GE MONEY BANK

Plaintiff

vs

ROBERT VAUGHAN

MICHELLE D VAUGHAN

Defendant(s)

:  
: No. 07-1917-CD

:  
: CIVIL ACTION - LAW

NOTICIA

USTED HA SIDO DEMANDADO/A EN LA CORTE. Si usted desea defender contra 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 contra 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. Meholick, Court Administrator 230 East Market Street  
Clearfield, PA 16830  
814-765-2641

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

GE MONEY BANK  
Plaintiff

vs

ROBERT VAUGHAN  
MICHELLE D VAUGHAN  
Defendant(s)

:  
: No. 07-1917-CD  
:  
:  
: 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 GE MONEY BANK , located at 4125 Windward Plaza Drive Alpharetta, GA 30005.
2. Defendant, ROBERT VAUGHAN, is an adult individual with a last known address of 643 Treasure Lk Du Bois, Clearfield County, PA 15801.
3. Defendant, MICHELLE D VAUGHAN, is an adult individual with a last known address of 643 Treasure Lk Du Bois, Clearfield County, PA 15801-0000.
4. It is averred that Defendants were issued an open end credit card account.

5. At all relevant times material hereto, Defendants have used said charge card for the purchase of products, goods and/or for obtaining services.

6. Defendants were 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 Defendants. A true and correct copy of the Statement of Account is attached hereto, incorporated herein and marked as Exhibit "A".

7. As of the date of this Complaint, the remaining balance due, owing and unpaid on Defendants' credit card account as a result of the charges made by said Defendants and/or any authorized users is the sum of \$1,206.12.

8. Despite reasonable and repeated demands for payment, Defendants have refused and continue to refuse to pay all sums due and owing on the aforementioned account balance, all to the damage and detriment of the Plaintiff.

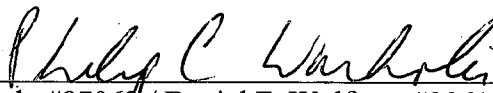
9. The amount in controversy is within the jurisdictional amount requiring compulsory arbitration.

WHEREFORE, Plaintiff respectfully requests this Honorable Court enter Judgment in favor of the Plaintiff and against Defendants in the amount of \$1,206.12, plus costs of this action and any other relief as this Court deems just and reasonable.

Respectfully Submitted,

Date:

1/25/08




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

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: 1/25/08

  
\_\_\_\_\_  
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

\*ACCOUNT# \*ORIG-ACCOUNT-NO \*CLIENT-NO \*CLIENT-NAME  
 \*CREDIT-GRANTOR  
 N00000020690442 C001RMS GECC  
 GE MONEY BANK  
 \*SUB-CLIENT-NO\*DEALER-NO \*CLIENT-ACCT# \*DEALER-NAME  
 7981924390790889 Lowe's Consumer  
 ACCT#N00000020690442 BAL 881.78 C/O DT 20070715 LPYMT DT 20061212  
 NAME VAUGHAN, ROBERT  
 ADDR 643 TREASURE LK  
 CITY ST ZIP DU BOIS PA 158019052  
 HMPH 8143754643 WKPH SSN XXX-XX-0117  
 \*MERCHANDISE-DESC  
 GECC  
 \*TRADE-INFO \*ACCT-  
 OPEN-DATE\*LAST-PURCHASE-DATE\*WRITE-OFF-DATE 20041102  
 20060808 20070715  
 \*LOSS-CYCLE-CODE\*PRINCIPAL-AMOUNT\*PLACED-AMOUNT\*PLACED-INT\*PLACED-FEE \*PLACED-COURT-  
 COST\*PLACED-MISC-FEE\*MONTHS-PAST-DUE  
 0181 881.78 1206.12 324.34 0.00 0.00  
 0.00  
 \*LAST-PYMT-DATE\*LAST-PYMT-AMOUNT\*FEE-PERCENT\*FEE-SCHEDULE\*DBR-SSN \*DBR-NAME  
 20061212 2500 XXX-XX-0117 VAUGHAN, ROBERT  
 \*DBR-ADDRESS-1 \*DBR-ADDRESS-2 \*DBR-  
 CITY \*DBR-ST\*DBR-ZIP  
 643 TREASURE LK DU BOIS  
 PA 158019052  
 \*DBR-COUNTY  
 \*DBR-PREV-ADDRESS  
 \*DBR-HOME-PHONE  
 8143754643  
 \*DBR-BUIS-PHONE\*DBR-BUIS-PHONE-EXT\*ALTERNATE-PHONE\*DBR-POE  
 \*DBR-POE-ADDRESS  
 \*DBR-POE-CITY \*DBR-POE-ST\*DBR-POE-ZIP\*DBR-POE-POSITION \*DBR-BANK-  
 NAME  
 \*DBR-BANK-ACCOUNT \*DBR-CHECK-ACCOUNT \*DBR-SAVING-ACCOUNT \*DBR-MCVISA-  
 ACCOUNT  
 \*DBR-RELATIVE \*DBR-RELATIVE-PHONE\*DBR1-SSN \*DBR1-RELATION  
 XXX-XX-2772  
 \*DBR1-NAME \*DBR1-ADDRESS  
 D, VAUGHAN, MICHELLE 643 TREASURE LK  
 \*DBR1-CITY \*DBR1-ST\*DBR1-ZIP \*DBR1-COUNTY \*DBR1-  
 HOME-PHONE\*DBR1-BUIS-PHONE\*DBR2-SSN  
 DU BOIS PA 158019052  
 XXX-XX-0000  
 \*DBR2-RELATION \*DBR2-NAME  
 \*DBR2-ADDRESS \*DBR2-  
 CITY \*DBR2-ST\*DBR2-ZIP  
 \*DBR2-COUNTY \*DBR2-HOME-PHONE\*DBR2-BUIS-PHONE  
 \*DBR-ATTY-NAME \*DBR-ATTY-PHONE  
 2  
 \*DBR-ATTY-ADDRESS  
 \*TRUSTEE-NAME \*TRUSTEE-ADDRESS  
 \*TRUSTEE-PHONE \*BNKR CASE-NO \*COURT-PHONE \*FILING-DATE \*TYPE \*REAF-AMOUNT  
 \*PYMT-AMOUNT \*SIGNED-DATE \*FILED-DATE  
 \*CONFIRM-DATE\*341-MEETING-DATE\*DISCHARGE-DATE\*REDEEM-DATE\*REDEEM-AMOUNT\*DATE-OF-  
 SERVICE\*TYPE-OF-SERVICE  
 \*DBR-SERVED \*SUIT-CASE-NO \*GARN-CASE-NO  
 \*COURT-DATE\*JUDG-DATE\*JUDG-AMOUNT  
 0.00

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

GE MONEY BANK  
Plaintiff

VS


ROBERT VAUGHAN  
MICHELLE D VAUGHAN  
Defendant(s)

:  
: No. 07-1917-CD  
:  
:  
:  
: CIVIL ACTION - LAW  
:  
:  
:

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the appeal  
complaint was served upon the individual(s) listed below by Regular and Certified Mail,  
Postage Pre-Paid on this 25 day of January, 2008.

J CHAD MOORE  
HAROLD SHEPLEY & ASSOCIATES, 485 BERLIN PLANK RD  
SOMERSET, PA 155010000

  
Amy E. 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

GE MONEY BANK,  
Plaintiff

vs.

ROBERT VAUGHAN and,  
MICHELLE D. VAUGHAN,  
Defendant

IN THE COURT OF COMMON  
PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

NO. 07-1917-CD

Civil Action - Law

**FILED** *no cc*  
*mjl:20/BAH*  
MAY 14 2008 *GR*

William A. Shaw  
Prothonotary/Clerk of Courts

### ANSWER

AND NOW comes the Defendant by and through their undersigned counsel, and files this

Answer and in support thereof responds as follows:

1. Admitted.

2. Admitted.

3. Admitted.

4. Admitted.

5. Admitted.

6. Denied insofar as the averments in Paragraph 6 suggest that the defendant has waived the right to dispute any statement received. By way of further answer, defendant specifically denies that he has received complete written explanation of the amount being sought by plaintiff. The terms and contents of Exhibit "A" speak for themselves.

7. Denied. Defendant specifically denies and disputes owing the amount of \$1206.12 to plaintiff and strict proof, explanation and evidence of the calculation of this sum is demanded.

8. Denied. Defendant has never made and outright refusal to pay.

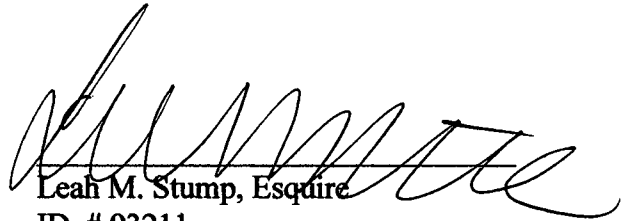
9. The averments in paragraph 9 constitute conclusions of law to which no response is required. To the extent these averments are deemed to be factual in nature they are denied and



strict proof therefore is demanded.

WHEREFORE, defendant demands judgment against plaintiff and that plaintiff's  
complaint be dismissed with prejudice.

Date: 5-12-08

A handwritten signature in black ink, appearing to read 'Leah M. Stump', written over a horizontal line.

Leah M. Stump, Esquire

ID. # 93211

J. Chad Moore, Esquire

I.D. # 76660

Attorney for Defendant

270 Market Street

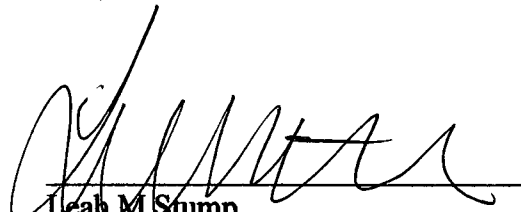
Millersburg, PA 17061

717-692-5533

**VERIFICATION**

LEAH M. STUMP, ESQUIRE, hereby states that she is the attorney for the Defendant in this action and verifies that the statements made in the foregoing pleading are true and correct to the best of her knowledge, information, and belief.

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



Leah M Stump  
Attorney for Defendant

GE MONEY BANK,  
Plaintiff

vs.

ROBERT VAUGHAN and,  
MICHELLE D. VAUGHAN,  
Defendant

: IN THE COURT OF COMMON  
: PLEAS OF CLEARFIELD COUNTY,  
: PENNSYLVANIA

:  
: NO. 07-1917-CD

:  
: Civil Action - Law

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Answer has been served by first class mail, postage pre-paid upon the following :

Philip C. Warholic, Esquire  
Wolpoff & Abramson, LLP  
4660 Trindle Road, 3<sup>rd</sup> Floor  
Camp Hill, PA 17011  
(717) 303-6700

5-12-08

Date



J. Chad Moore, Esquire

I.D. #76660

Leah M. Stump, Esquire

I.D. #93211

Attorney for Defendant

270 Market Street

Millersburg, PA 17061

(717) 692-5533

FILED

MAY 14 2008

William A. Shaw  
Prothonotary/Clerk of Courts

DECLARATION OF DISCOVERY

A Declaration of Discovery is hereby made by the undersigned, who is the owner of the property described in the following:

1. The property is located in the County of [ ] State of [ ] and is owned by [ ]

2. The property is located in the County of [ ] State of [ ] and is owned by [ ]

3. The property is located in the County of [ ] State of [ ] and is owned by [ ]

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

GE Money Bank

Plaintiff

NO. 07-1917-CD

vs.

CIVIL ACTION – LAW

Robert Vaughan  
Michelle D Vaughan

Defendant(s)

**PRAECIPE TO SETTLE, DISCONTINUE, AND END**

Please mark the above-captioned action as settled, discontinued, and ended.

Respectfully Submitted,

By:

*Philip C Warholic*

Amy F. Doyle #87062

Philip C. Warholic #86341

David R. Galloway #87326

Sarah E. Ehasz #86469

Robert N. Polas, Jr. #201259

MANN BRACKEN LLP

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

(866) 253-0128

MB File No. 176251409

5  
**FILED** 1cc + 1 Cert +  
m/12:21pm of disc issued  
MAY 06 2009 to Atty  
Warholic  
William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

GE Money Bank

Plaintiff

NO. 07-1917-CD

vs.

CIVIL ACTION – LAW

Robert Vaughan  
Michelle D Vaughan

Defendant(s)

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of Praecipe To  
Settle, Discontinue And End, was served upon the individual(s) listed below by  
Regular Mail, Postage Pre-Paid on this 4<sup>th</sup> day of May, 2009.

Leah Stump, Esquire  
Harold Shepley & Associates  
270 Market St  
Millersburg, PA 17061



Amy F. Doyle #87062

Philip C. Warholc #86341

~~David R. Galloway #87326~~

Sarah E. Ehasz #86469

Robert N. Polas, Jr. #201259

MANN BRACKEN LLP

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  
(866) 253-0128

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

GE Money Bank

Vs.

No. 2007-01917-CD

Robert Vaughan  
Michelle Vaughan

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 May 6, 2009, marked:

Settled, discontinued and ended

Record costs in the sum of \$95.00 have been paid in full by Leah M. Stump Esq..

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 6th day of May A.D. 2009.



\_\_\_\_\_  
William A. Shaw, Prothonotary

