

07-2055-CD
Palisades Coll. Vs Ernest Moore

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

PALISADES COLLECTION,LL.C. ASSIGNEE OF HSBC

No.

07-2055-CD

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

Plaintiff

Type of Case: Contract

VS.

ERNEST MOORE
85 HARPER RD
DU BOIS PA 158017409

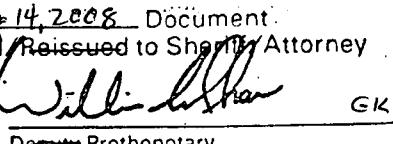
Filed on Behalf of: Plaintiff

Defendant(s)

Date: 12/11/07


Amy F. Doyle #87062 / Daniel F. Wolfson #20617
Philip C. Warholic #86341 / David R. Galloway #87326
Tonilyn M. Chippie #87852 / Sarah E. Ehasz #86469
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

Aug 14, 2008 Document
Reinstated Reissued to Sheriff Attorney
for service


William A. Shaw
Deputy Prothonotary

FILED
M 10:45 AM
DEC 17 2007
1CC Sheriff
William A. Shaw
Prothonotary/Clerk of Courts
1CC Atty

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION, L.L.C.

ASSIGNEE OF HSBC

Plaintiff

vs

ERNEST MOORE

Defendant(s)

: No.

: 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.

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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

PALISADES COLLECTION,L.L.C.

ASSIGNEE OF HSBC

Plaintiff

: No.

vs

: CIVIL ACTION - LAW

ERNEST MOORE

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) días 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.

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814-765-2641

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PALISADES COLLECTION,L.L.C.
ASSIGNEE OF HSBC
Plaintiff

: No.

vs

: CIVIL ACTION - LAW

ERNEST MOORE
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 PALISADES COLLECTION,L.L.C. ASSIGNEE OF HSBC , located at 210 Sylvan Avenue Englewood Cliffs, NJ 07632.
2. Defendant, ERNEST MOORE, is an adult individual with a last known address of 85 Harper Rd Du Bois, Clearfield County, PA 15801-7409.
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 \$13,815.52.

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 \$1,748.70.

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 \$13,815.52, plus interest in the amount of \$1,748.70, plus costs of this action and any other relief as this Court deems just and reasonable.

Respectfully Submitted,

Date: 12/11/01


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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: 12/11/02

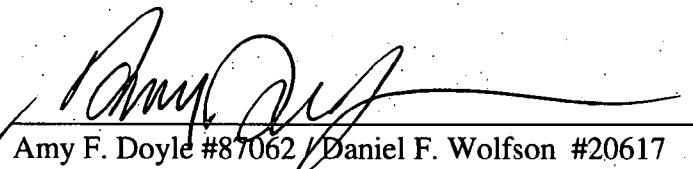

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Counsel for Plaintiff

Exhibit "A"

File Number 167887890 Media Number 06261002878 Account Number 0420601100398004
Provider PALISADES COLLECTION LLC Assignee of HSBC

PAGE 1

PLAINTIFF = 451914
ACCOUNT NUMBER = 0420601100398004
POOL ID = HSBC03
CURRENT BALANCE = 13815.521
LSTPYMTDT = 20040724
CO DATE = 20050331
DEBTOR #1 LAST NAME = MOORE
DEBTOR #1 FIRST NAME = ERNEST
DEBTOR #1 MIDDLE NAME =
DEBTOR #1 ADDR 1 = 195 CENTRAL ST
DEBTOR #1 ADDR 2 =
DEBTOR #1 CITY = ROSSITER
DEBTOR #1 STATE = PA
DEBTOR #1 ZIP = 15767
DEBTOR #1 HOMEPHONE = 8149393747
DEBTOR #1 WORKPHONE = 0
DEBTOR #1 SOCSEC = XXX-X-0376
DEBTOR #1 DOB =
DEBTOR #2 LAST NAME =
DEBTOR #2 FIRST NAME =
DEBTOR #2 MIDDLE NAME =
DEBTOR #2 ADDR 1 =
DEBTOR #2 ADDR 2 =
DEBTOR #2 CITY =
DEBTOR #2 STATE =
DEBTOR #2 ZIP =
DEBTOR #2 HOMEPHONE = 0000000000
DEBTOR #2 WORKPHONE = 0000000000
DEBTOR # SOCSEC =
DEBTOR #2 DOB =
DEBTOR = 3309732
= 20020925
=

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 1 of 1 Services

Sheriff Docket #

103551

PALISADES COLLECTION, L.L.C. Assignee

Case # 07-2055-CD

vs.

ERNEST MOORE

TYPE OF SERVICE COMPLAINT

SHERIFF RETURNS

NOW April 28, 2008 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT "NOT FOUND" AS TO ERNEST MOORE, DEFENDANT. DEFENDANT UNKNOWN.

SERVED BY: /

Return Costs

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	WOLPOFF	244210	10.00
SHERIFF HAWKINS	WOLPOFF	244210	71.22

Sworn to Before me This

____ Day of 2008

So Answers, William A. Shaw
Prothonotary/Clerk of Courts

Chester A. Hawkins
by Marlene Harry
Chester A. Hawkins
Sheriff

FILED
03:00 cm
APR 28 2008
(Signature)

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

PALISADES COLLECTION, L.L.C. ASSIGNEE OF HSBC

No.

07-2055-CD

C/O WOLPOFF & ABRAMSON, L.L.P.
4660 TRINDLE ROAD, 3rd FLOOR
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Plaintiff

Type of Case: Contract

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VS.

Filed on Behalf of: Plaintiff

ERNEST MOORE
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Defendant(s)

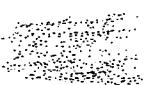
Date: 12/11/07


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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.

DEC 17 2007

Attest.


William L. Lohr
Prothonotary/
Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION, L.L.C.
ASSIGNEE OF HSBC
Plaintiff

vs

ERNEST MOORE
Defendant(s)

: No.

: CIVIL ACTION - LAW

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814-765-2641

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ASSIGNEE OF HSBC

Plaintiff

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vs

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ERNEST MOORE

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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

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Plaintiff

: No.

vs

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ERNEST MOORE

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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:

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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 \$13,815.52.

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 \$1,748.70.

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 \$13,815.52, plus interest in the amount of \$1,748.70, plus costs of this action and any other relief as this Court deems just and reasonable.

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Date: 12/11/01


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Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

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Date: 12/11/01

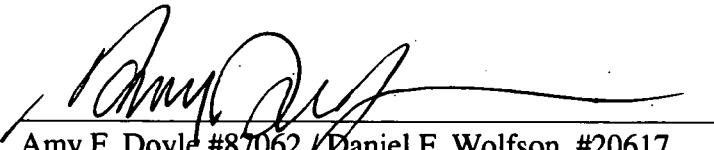

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Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

Exhibit "A"

File Number 167887890 Media Number 062261002878 Account Number 0420601100398004

PROVIDER PALISADES COLLECTION LLC ASSIGNEE OF HSBC

PAGE 1

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DEBTOR #1 ADDR 2 =
DEBTOR #1 CITY = ROSSITER
DEBTOR #1 STATE = PA
DEBTOR #1 ZIP = 15767
DEBTOR #1 HOMEPHONE = 8149393747
DEBTOR #1 WORKPHONE = 0
DEBTOR #1 SOCSEC = XXX-XX-0376
DEBTOR #1 DOB =
DEBTOR #2 LAST NAME =
DEBTOR #2 FIRST NAME =
DEBTOR #2 MIDDLE NAME =
DEBTOR #2 ADDR 1 =
DEBTOR #2 ADDR 2 =
DEBTOR #2 CITY =
DEBTOR #2 STATE =
DEBTOR #2 ZIP =
DEBTOR #2 HOMEPHONE = 0000000000
DEBTOR #2 WORKPHONE = 0000000000
DEBTOR # SOCSEC =
DEBTOR#2 DOB =
DEBTOR = 3309732
= 20020925
=

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION, L.L.C.
ASSIGNEE OF HSBC
Plaintiff

No. 07-2055-CD

VS

CIVIL ACTION - LAW

ERNEST MOORE
Defendant(s)

PRAECIPE TO REINSTATE

To the Prothonotary:

Kindly reinstate the complaint in the above-referenced matter.

Respectfully Submitted,

Date: 7/22/08



Amy F. Doyle #87062 / 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, L.L.P.
and Eskanos & Adler, P.C.
4660 Trindle Road, Suite 300, Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

FILED

M 11:31 a.m. 6K
AUG 14 2008

William A. Shaw
Prothonotary/Clerk of Courts

Atty Paid 7.00
1 cc + 1 Reinstated
Complaint to
Atty, Shff.

(GW)

IN THE COURT OF COMMON PLEAS OF JEFFERSON COUNTY, PENNSYLVANIA

PALISADES COLLECTION,L.L.C.
ASSIGNEE OF HSBC
210 SYLVAN AVENUE
ENGLEWOOD CLIFFS NJ 07632
Plaintiff

vs

ERNEST MOORE
4717 JUNEAU RD
PUNXSUTAWNEY PA 15767-7214

Defendant(s)

No. 449-2007-CO

CIVIL ACTION - LAW

FILED

MAY 29 2007

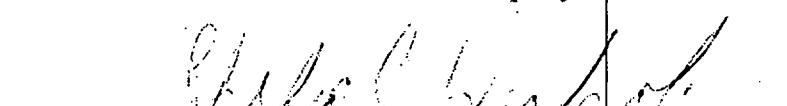
TONYA S. GEIST
PHO. & CLERK of COURTS

Filed on behalf of:

Plaintiff, PALISADES COLLECTION,L.L.C.

Counsel of record for this party:

Date: 5/29/07


Amy F. Doyle #87062 / Daniel F. Wolfson #20617
Philip C. Warholic #86341 / David R. Galloway #87326
Tonilyn M. Chippie #87852 / Sarah E. Ehasz #86469
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

IN THE COURT OF COMMON PLEAS OF JEFFERSON COUNTY, PENNSYLVANIA

PALISADES COLLECTION, L.L.C.
ASSIGNEE OF HSBC
Plaintiff

No. 449-2007-C0

vs
ERNEST MOORE
Defendant(s)

CIVIL ACTION - LAW

FILED

MAY 29 2007

W.W. GEIST
CLERK of COURTS

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Jefferson County
Laurel Legal Services, Inc. 201 Main Street
Brookville, PA 15825
814-849-3044

IN THE COURT OF COMMON PLEAS OF JEFFERSON COUNTY, PENNSYLVANIA

PALISADES COLLECTION, L.L.C.
ASSIGNEE OF HSBC
Plaintiff

vs

ERNEST MOORE
Defendant(s)

NO. 449-2007-41

CIVIL ACTION - LAW

• 378

MAY 29 2007

TONYAS. GEIST
PRO. & CLERK of COURTS

NOTICIA

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Jefferson County
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Brookville, PA 15825
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FILED

MAY 29 2007

TONYAS. GEST
PRO. & CLERK OF COURTS

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PALISADES COLLECTION, L.L.C.

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Plaintiff

: No. 449-2007 -CD

vs

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1. Plaintiff is PALISADES COLLECTION, L.L.C. ASSIGNEE OF HSBC, located at 210 Sylvan Avenue Englewood Cliffs, NJ 07632.
2. Defendant, ERNEST MOORE, is an adult individual with a last known address of 4717 Juneau Rd Punxsutawney, Jefferson County, PA 15767-7214.
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 \$13,815.52.

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 \$1,748.70.

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 \$13,815.52, plus interest in the amount of \$1,748.70, plus costs of this action and any other relief as this Court deems just and reasonable.

Respectfully Submitted,

Date: 5/13/03


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: 1/12/12


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
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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"

PLAINTIFF = 451914
ACCOUNT NUMBER = 0420601100398004
POOL ID = HSBC03
CURRENT BALANCE = 13815.52
LSTPY MDT = 20040724
CO DATE = 20050331
DEBTOR #1 LAST NAME = MOORE
DEBTOR #1 FIRST NAME = ERNEST
DEBTOR #1 MIDDLE NAME =
DEBTOR #1 ADDR 1 = 195 CENTRAL ST
DEBTOR #1 ADDR 2 =
DEBTOR #1 CITY = ROSSITER
DEBTOR #1 STATE = PA
DEBTOR #1 ZIP = 15767
DEBTOR #1 HOMEPHONE = 8149393747
DEBTOR #1 WORKPHONE = 0
DEBTOR #1 SOCSEC =
DEBTOR #1 DOB =
DEBTOR #2 LAST NAME =
DEBTOR #2 FIRST NAME =
DEBTOR #2 MIDDLE NAME =
DEBTOR #2 ADDR 1 =
DEBTOR #2 ADDR 2 =
DEBTOR #2 CITY =
DEBTOR #2 STATE =
DEBTOR #2 ZIP =
DEBTOR #2 HOMEPHONE = 0000000000
DEBTOR #2 WORKPHONE = 0000000000
DEBTOR #2 SOCSEC =
DEBTOR #2 DOB =
DEBTOR = 3309732
= 20020925
=

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
NO: 07-2055-CD

PALISADES COLLECTION, L.L.C. Assignee of HSBC
vs
ERNEST MOORE

SERVICE # 1 OF 1

COMPLAINT & PRAECIPE

SERVE BY: 09/13/2008 HEARING: PAGE: 104537

DEFENDANT: ERNEST MOORE
ADDRESS: 70 KILMER RD
DUBOIS, PA 15801

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

ATTEMPTS

8-27-08- NH
Left Notice
2:16 Pm

VACANT

9-02-08

DEF

Not at

ABOVE ADDRESS

OCCUPIED

SHERIFF'S RETURN

NOW, _____ AT _____ AM / PM SERVED THE WITHIN

COMPLAINT & PRAECIPE ON ERNEST MOORE, DEFENDANT

BY HANDING TO _____ / _____

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

ADDRESS SERVED _____

NOW _____ AT _____ AM / PM POSTED THE WITHIN

COMPLAINT & PRAECIPE FOR ERNEST MOORE

AT (ADDRESS) _____

NOW 09-15-08 AT 9:20 AM / PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF **NOT FOUND** AS TO ERNEST MOORE

REASON UNABLE TO LOCATE DEFENDANT moved from residence

SWORN TO BEFORE ME THIS

DAY OF 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY: Mark A. Cuth
Deputy Signature

Mark A. Coudriet
Print Deputy Name

FILED

09/13/08

SEP 15 2008

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PALISADES COLLECTION,L.L.C.
ASSIGNEE OF HSBC
Plaintiff

No. 07-2055-CD

VS

CIVIL ACTION - LAW

ERNEST MOORE
Defendant(s)

PRAECIPE TO REINSTATE

To the Prothonotary:

Kindly reinstate the complaint in the above-referenced matter.

Respectfully Submitted,

Date: 7/22/08

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 LLC
The Successor by Merger to Wolpoff & Abramson, L.L.P.
and Eskanos & Adler, P.C.
4660 Trindle Road, Suite 300, 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.

AUG 14 2008

Attest.

W. C. Warholic
Prothonotary/
Clerk of Courts

IN THE COURT OF COMMON PLEAS OF JEFFERSON COUNTY, PENNSYLVANIA

PALISADES COLLECTION, L.L.C.
ASSIGNEE OF HSBC
210 SYLVAN AVENUE
ENGLEWOOD CLIFFS NJ 07632

Plaintiff

vs

ERNEST MOORE
4717 JUNEAU RD
PUNXSUTAWNEY PA 15767-7214

Defendant(s)

No. 449-2007-CO

CIVIL ACTION - LAW

FILED

MAY 29 2007

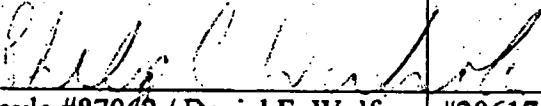
TONY A. GEIST
PHO. & CLERK of COURTS

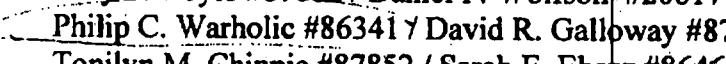
Filed on behalf of:

Plaintiff, PALISADES COLLECTION, L.L.C.

Counsel of record for this party:

Date: 5/29/07


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 / Bruce H. Cherkis #18837

Ronald S. Canter #94000 / Ronald M. Abramson #94266

Wolpoff & Abramson, L.L.P.

Attorneys in the Practice of Debt Collection

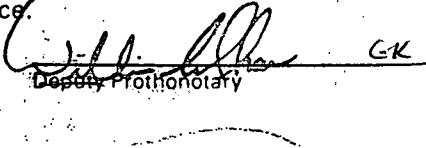
4660 Trindle Road, Suite 300

Camp Hill, PA 17011

Telephone: (717) 303-6700

Counsel for Plaintiff

Aug 14 2008 Document
Reinstated/Reissued to Sheriff/Attorney
for service.


G.K.
Deputy Prothonotary

IN THE COURT OF COMMON PLEAS OF JEFFERSON COUNTY, PENNSYLVANIA

PALISADES COLLECTION, L.L.C.
ASSIGNEE OF HSBC
Plaintiff

vs

ERNEST MOORE
Defendant(s)

No. 449-2007-CR

CIVIL ACTION - LAW

FILED

MAY 29 2007

WYAS GEIST
CLERK of COURTS

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.

Jefferson County
Laurel Legal Services, Inc. 201 Main Street
Brookville, PA 15825
814-849-3044

IN THE COURT OF COMMON PLEAS OF JEFFERSON COUNTY, PENNSYLVANIA

PALISADES COLLECTION, L.L.C.
ASSIGNEE OF HSBC
Plaintiff

vs.

ERNEST MOORE
Defendant(s)

No. 449-2007-CI

CIVIL ACTION - LAW

FILED

MAY 29 2007

TONYA S. GEIST
PRO. & CLERK of COURTS

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) días 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 importantes para usted.

USTED DEBE LLEVAR ESTE PAPEL A SU ABOGADO ENSEGUITA. 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.

Jefferson County
Laurel Legal Services, Inc. 201 Main Street
Brookville, PA 15825
814-849-3044

FILED

MAY 29 2007

TONYA S. GENT
PRO. & CLERK OF COURTS

IN THE COURT OF COMMON PLEAS OF JEFFERSON COUNTY, PENNSYLVANIA

PALISADES COLLECTION,L.L.C.
ASSIGNEE OF HSBC
Plaintiff

vs

ERNEST MOORE
Defendant(s)

No. 449-2007-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 PALISADES COLLECTION,L.L.C. ASSIGNEE OF HSBC , located at 210 Sylvan Avenue Englewood Cliffs, NJ 07632.
2. Defendant, ERNEST MOORE, is an adult individual with a last known address of 4717 Juneau Rd Punxsutawney, Jefferson County, PA 15767-7214.
3. It is averred that Defendant was issued an open end credit account (hereinafter "Account").

RECEIVED
CLERK OF COURTS
MAY 29 2007
BY [Signature]

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 \$13,815.52.

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 \$1,748.70.

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 \$13,815.52, plus interest in the amount of \$1,748.70, plus costs of this action and any other relief as this Court deems just and reasonable.

Respectfully Submitted,

Date: 8/13/02


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: 1/12/02


Amy F. Doyle #87062 / Daniel F. Wolfson #20617
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Tonilyn M. Chippie #87852 / Sarah E. Ehasz #86469
Robert N. Polas, Jr. #201259 / Bruce H. Cherkis #18837
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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"

PLAINTIFF = 451914
ACCOUNT NUMBER = 0420601100398004
POOL ID = HSBC03
CURRENT BALANCE = 13815.52
LSTPY MTDT = 20040724
CO DATE = 20050331
DEBTOR #1 LAST NAME = MOORE
DEBTOR #1 FIRST NAME = ERNEST
DEBTOR #1 MIDDLE NAM =
DEBTOR #1 ADDR 1 = 195 CENTRAL ST
DEBTOR #1 ADDR 2 =
DEBTOR #1 CITY = ROSSITER
DEBTOR #1 STATE = PA
DEBTOR #1 ZIP = 15767
DEBTOR #1 HOMEPHONE = 8149393747
DEBTOR #1 WORKPHONE = 0
DEBTOR #1 SOCSEC =
DEBTOR #1 DOB =
DEBTOR #2 LAST NAME =
DEBTOR #2 FIRST NAME =
DEBTOR #2 MIDDLE NAM =
DEBTOR #2 ADDR 1 =
DEBTOR #2 ADDR 2 =
DEBTOR #2 CITY =
DEBTOR #2 STATE =
DEBTOR #2 ZIP =
DEBTOR #2 HOMEPHONE = 0000000000
DEBTOR #2 WORKPHONE = 0000000000
DEBTOR #2 SOCSEC =
DEBTOR #2 DOB =
DEBTOR = 3309732
= 20020925
=

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104537
NO: 07-2055-CD
SERVICES 1
COMPLAINT & PRAECIPE

PLAINTIFF: PALISADES COLLECTION, L.L.C. Assignee of HSBC
vs.
DEFENDANT: ERNEST MOORE

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	MANN	006989	10.00
SHERIFF HAWKINS	MANN	006989	49.46

S
FILED
01/31/08
JAN 07 2008
WAS
William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

So Answers,

____ Day of _____ 2008


Chester A. Hawkins
Sheriff

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

PALISADES COLLECTIONS, LLC, HSBC

* NO. 2007-2055-CD

Plaintiffs

*

VS.

*

ERNEST MOORE

*

Defendant

*

*

*

ORDER

NOW, this 25th day of June, 2013, upon the Court's review of the docket and noting no activity for a period of over four years, it is the ORDER of this Court that the case be moved to inactive status. The Prothonotary shall code the case in Full Court as Z-INACTA.

BY THE COURT,

Fredric J. Ammerman
FREDRIC J. AMMERMAN
President Judge

FILED No CC
6/9/07 cm
2 JUN 28 2013

William A. Shaw
Prothonotary/Clerk of Courts

66