

07-2088-CD

Palisades Coll. Vs Benjamin Krause

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

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

No. 07-2088-CD

VS

CIVIL ACTION - LAW

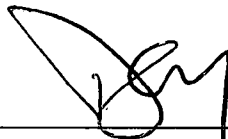
BENJAMIN P KRAUSE
Defendant(s)

PRAECIPE TO SETTLE, DISCONTINUE, AND END

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

Respectfully Submitted,

By:



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

Date:

3/23/08

FILED ICC & 1 Cert
m/11:57am of disc issued
MAR 31 2008 to Atty Galloway.

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. 07-2088-CD

vs.


CIVIL ACTION - LAW

BENJAMIN P KRAUSE
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 26th day of
march, 2008

JAMES NADDEO
207 E MARKET ST PO BOX 552
CLEARFIELD, PA 168300000



~~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
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

CIVIL DIVISION

COPY

Palisades Collection, LLC
HSBC

Vs.
Benjamin P. Krause

No. 2007-02088-CD

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 March 31, 2008, marked:

Settled, discontinued and ended

Record costs in the sum of \$85.00 have been paid in full by Amy F. Doyle Esq.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 31st day of March A.D. 2008.



William A. Shaw, Prothonotary

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

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

No.

07-2088-CD

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

Type of Case: Contract

Type of Pleading:

VS.

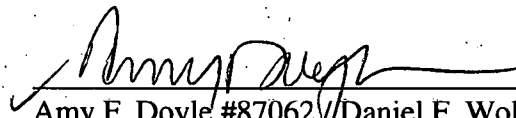
Filed on Behalf of: Plaintiff

BENJAMIN P KRAUSE
515 DAVID ST
HOUTZDALE PA 16651

Defendant(s)

Date:

12/13/07



Amy F. Doyle #87062 / Daniel F. Wolfson #20617
Philip C. Warholic #86341 / David R. Galloway #87326
Tonilyn M. Chippie #87852 / Sarah E. Ehasz #86469
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 ^{ICC Sheriff}
m12:26 PM
DEC 21 2007
Atty pd. 85.00
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

VS

BENJAMIN P KRAUSE
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.

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

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

vs

BENJAMIN P KRAUSE
Defendant(s)

: No.

: 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

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

vs

BENJAMIN P KRAUSE
Defendant(s)

:
: No.
:
:
:

: 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, BENJAMIN P KRAUSE, is an adult individual with a last known address of 515 David St Houtzdale, Clearfield County, PA 16651.
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 \$6,033.81.

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 \$431.45.

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.

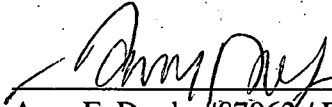
12. The amount in controversy is within the jurisdictional amount requiring compulsory arbitration.

WHEREFORE, Plaintiff respectfully requests this Honorable Court enter Judgment in favor of the Plaintiff and against Defendant in the amount of \$6,033.81, plus interest in the amount of \$431.45, plus costs of this action and any other relief as this Court deems just and reasonable.

Respectfully Submitted,

Date:

12/13/07



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

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:

12/13/07



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

Exhibit "A"

PLAINTIFF = 451914

ACCOUNT NUMBER = 71339700155879

POOL ID = HOUS15

CURRENT BALANCE = 6033.81

LSTPYMTDT = 20050603

CO DATE = 20060131

DEBTOR #1 LAST NAME = KRAUSE

DEBTOR #1 FIRST NAME = BENJAMIN P

DEBTOR #1 MIDDLE NAM =

DEBTOR #1 ADDR 1 =

DEBTOR #1 ADDR 2 =

DEBTOR #1 CITY = HOUTZDALE

DEBTOR #1 STATE = PA

DEBTOR #1 ZIP = 16651

DEBTOR #1 HOMEPHONE = 8145929172

DEBTOR #1 WORKPHONE = 8145745625

DEBTOR #1 SOCSEC = XX-XX-6860

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 =

DEBTOR #2 WORKPHONE =

DEBTOR # SOCSEC =

DEBTOR#2 DOB =

DEBTOR = 4592032

= 20020710

=

=

=

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103572
NO: 07-2088-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: PALISADES COLLECTION, LLC, Assignee
vs.
DEFENDANT: BENJAMIN P. KRAUSE

SHERIFF RETURN

NOW, January 18, 2008 AT 2:11 PM SERVED THE WITHIN COMPLAINT ON BENJAMIN P. KRAUSE
DEFENDANT AT SHERIFF'S OFFICE - 1 N 2ND ST, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY
HANDING TO BENJAMIN KRAUSE, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL
COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: NEVLING /

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	WOLPOFF	238675	10.00
SHERIFF HAWKINS	WOLPOFF	238675	55.77

FILED

03:00 PM
APR 28 2008

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

_____ Day of _____ 2008

So Answers,

Chester A. Hawkins
by Marilyn Harper

Chester A. Hawkins
Sheriff