

07-2096-CD

Pinnacle Credit vs Carol Nevling

146521

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

Pinnacle Credit Svc LLC CIVIL ACTION
(Plaintiff)

c/o 2417 Welsh Road Suite 21 #520

(Street Address)

Phila., PA 19114

(City, State ZIP)

No. 07-2096-CD

Type of Case: CIVIL

Type of Pleading: COMPLAINT

Filed on Behalf of:

CAROL Nevling

(Defendant)

Pinnacle Credit Svc LLC
(Plaintiff/Defendant)

515 Pruner St Apt 8

(Street Address)

Osceola Mills PA 16666

(City, State ZIP)

David J. Apothaker, Esquire

(Filed by)

2417. Welsh Road Suite 21 #520

(Address) Phila., PA 19114

215-624-8920

(Phone)

(Signature)

FILED Atty pd. 85.00
m 19 37/01 ICC Sheriff
DEC 26 2001

ICC Atty

William A. Shaw
Prothonotary/Clerk of Courts

Our File No.: 146521
APOTHAKER & 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

PINNACLE CREDIT SERVICES 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.)
CAROL NEVLING)
515 PRUNER ST APT 8)
OSCEOLA MILLS, PA 16666)
Defendant.)
)

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 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 in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other 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 LEGAL HELP.

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

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las páginas siguientes, usted tiene veinte (20) días de plazo al partir de la fecha de la demanda y la notificación. Hace falta asentir una comparecencia escrita o con un abogado y entregar a la corte en forma escrita sus objeciones a las demandas en contra de su persona. Se avisa que si usted no se defiende, la corte tomará medidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y requiere que usted compla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFFICIENTE DE PAGAR TAL SERVICIO. VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

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

APOTHAKER & ASSOCIATES, P.C.

BY: David J. Apotheker, Esq.
Attorney I.D.#38423
2417 Welsh Road, Suite 21 #520
Philadelphia, PA 19114
(215) 634-8920
Attorneys for Plaintiff

PINNACLE CREDIT SERVICES 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.)
CAROL NEVLING)
515 PRUNER ST APT 8)
OSCEOLA MILLS, PA 16666)
Defendant.)

**CIVIL ACTION COMPLAINT
FIRST COUNT**

1. Plaintiff, PINNACLE CREDIT SERVICES LLC, is a company with its principal place of business located at c/o Apotheker & Associates, P.C., 2417 Welsh Road, Suite 21 #520, Philadelphia, PA 19114.

2. Defendant is CAROL NEVLING, an adult individual residing at 515 PRUNER ST APT 8 OSCEOLA MILLS, PA 16666.

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 \$2,089.34.

8. Although demand has been made, Defendant has failed to make payment of the amount due as above.

9. The original creditor is CHASE MANHATTAN BANK.

WHEREFORE, Plaintiff demands judgment in favor of Plaintiff and against Defendant(s) for the sum of \$2,089.34 and requests this Court award Plaintiff attorney's fees and costs to the extent permitted by applicable law.

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

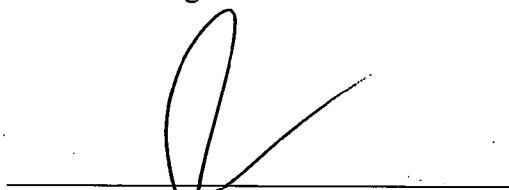
BY: _____
David J. Apothaker

Dated: 12/18/2007

Our File No.: 146521

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 of "David J. Apothaker" is written over a horizontal line. The signature is in cursive and appears to be "David J. Apothaker" followed by "Attorney for Plaintiff".

DATE: 12/18/2007

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

CAROL NEVLING
515 PRUNER ST APT 8
OSCEOLA MILLS, PA 16666

STATEMENT OF ACCOUNT

Debtor's Name: CAROL NEVLING

Account Number: 5260317680003037

Original Creditor: CHASE MANHATTAN BANK

Balance Due: \$2,089.34

Our File No.: 146521

EXHIBIT "A"

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

PINNACLE SERVICES
(Plaintiff)

2417 WELSH ROAD
(Street Address)
SU/RE 276520
PALM SPRINGS, CA 91334
(City, State ZIP)

CIVIL ACTION

No. 07-2096-CO

Type of Case: CIVIL

Type of Pleading: ANSWER

VS.

CAROL NEWLING
(Defendant)

515 PRUNERT ST APG
(Street Address)

OSACON MUS RS 1666-1100
(City, State ZIP)

Filed on Behalf of:

PINNACLE SERVICES / CAROL NEWLING
(Plaintiff/Defendant)

Carol Newling
(Filed by)

515 PRUNERT APG8
(Address)

(814) 339-7844
(Phone)

Carol Newling
(Signature)

FILED
m/8/4/2008
FEB 04 2008
NOCC
GR

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA CIVIL ACTION - LAWPlaintiff PINNACLE SERVICESGRANT SERVICES LLC SUITE NO. 07-2096-CD

2417 WELSH ROAD

SUITE 2145 20

Defendant PINNACLE SERVICESCAROL NEVILLESIS PRESENTATION 1666-100

OCEANSIDE, RI

ANSWER

1.

2.

3.

4.

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6.

7. DISPUTE THE ACCURACY OF MM MARKS

8.

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15.

(Add extra paragraphs (and pages) as needed.)

WHEREFORE, the Defendant respectfully requests that the Plaintiff's Complaint be dismissed.

(If new matter is to be completed, continue with the next number after the last number of your answer.)

NEW MATTER

The averments of paragraphs through above are incorporated with this new matter as though fully set forth herein. ~~STRUCTURE OF LUMINA RIONS~~ ~~THIS~~
 RW.

THE LAST PAYMENT ON THIS ACCOUNT
WAS MADE IN MAY 2003.

WHEREFORE, the Plaintiff respectfully requests that the following relief be granted:

I CANNOT AFFORD MORE PAYMENTS AT
THIS TIME

If Counterclaim(s) is\are to be completed, continue with the next number after the last number of your answer.

COUNTERCLAIM ONE

The averments of paragraphs through above are incorporated with this
COUNTERCLAIM as though fully set forth herein.

WHEREFORE, the Defendant respectfully requests that the following relief be granted:

COUNTERCLAIM TWO

The averments of paragraphs through above are incorporated with this
COUNTERCLAIM as though fully set forth herein.

WHEREFORE, the Defendant respectfully requests that the following relief be granted:

Respectfully submitted,

VERIFICATION

I hereby verify that the statements made in this Pleading are true and correct. I understand that false statements herein are made subject to the penalties of 18 PACS 4904, relating to unsworn falsification to authorities.

Our file No.: 146521
APOTHAKER & ASSOCIATES, P.C.
BY: Kimberly F. Scian, Esquire
Attorney I.D.#55140
2417 Welsh Road, Suite 21 #520
Philadelphia, PA 19114
215-634-8920
Attorneys for Plaintiff

PINNACLE CREDIT SERVICES LLC)	COURT OF COMMON PLEAS OF
)	CLEARFIELD COUNTY
)	
Plaintiff,)	DOCKET NO.: 07-2096-CD
vs.)	
CAROL NEVLING)	Civil Action
)	
Defendant.)	
)	

ANSWER TO NEW MATTER

Plaintiff, PINNACLE CREDIT SERVICES LLC, by and through their attorney, answers the following New Matter:

1. Denied. Plaintiff's claim is not barred by the applicable statute of limitations.
2. No responsive pleading required.

WHEREFORE, Plaintiff demands that Defendant's New Matter be dismissed.

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

BY:

Kimberly F. Scian, Esquire

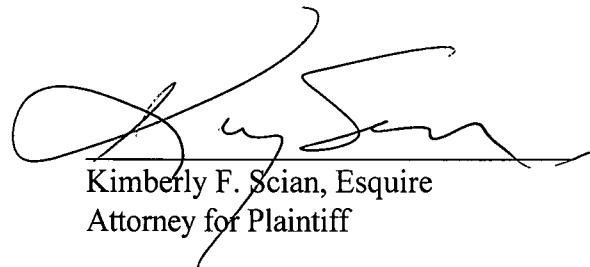
DATED: February 26, 2008

FILED
m 11 16 2008
FEB 29 2008
NO CC
GK

William A. Shaw
Prothonotary/Clerk of Courts

VERIFICATION

Kimberly F. Scian, Esquire 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 Answer to New Matter 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.



Kimberly F. Scian, Esquire
Attorney for Plaintiff

DATE: 2/26/2008

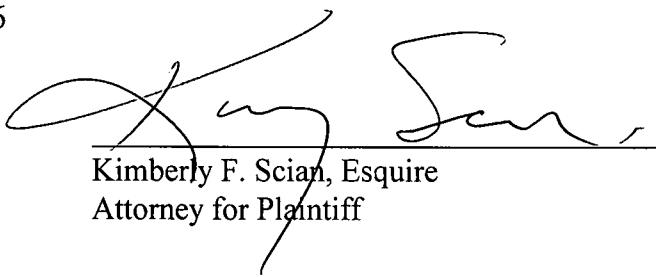
Our file No.: 146521
APOTHAKER & ASSOCIATES, P.C.
BY: Kimberly F. Scian, Esquire
Attorney I.D. #55140
2417 Welsh Road, Suite 21 #520
Philadelphia, PA 19114
(215) 634-8920
Attorney for Plaintiff

PINNACLE CREDIT SERVICES LLC) COURT OF COMMON PLEAS
vs.) CLEARFIELD COUNTY
Plaintiff,)
CAROL NEVLING)
Defendant.) NO.: 07-2096-CD

CERTIFICATION OF SERVICE

I, Kimberly F. Scian, Esquire, attorney for Plaintiff, certify that on 2/26/2008, I mailed a copy of the Answer to New Matter by Regular mail to

CAROL NEVLING
515 PRUNER ST APT 8
OSCEOLA MILLS, PA 16666



Kimberly F. Scian, Esquire
Attorney for Plaintiff

Date: 2/26/2008

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103582
NO: 07-2096-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: PINNACLE CREDIT SVCS LLC
VS.
DEFENDANT: CAROL NEVLING

SHERIFF RETURN

NOW, January 09, 2008 AT 11:11 AM SERVED THE WITHIN COMPLAINT ON CAROL NEVLING DEFENDANT AT 515 PRUNER ST. APT 8, OSCEOLA MILLS, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO CAROL NEVLING, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: HUNTER /

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	APOTHAKER	68894	10.00
SHERIFF HAWKINS	APOTHAKER	68894	38.20

FILED
011:37cm
MAY 02 2008
(LM)

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

Day of _____ 2008

So Answers,

Chester A. Hawkins
by Marilyn Hawk
Chester A. Hawkins
Sheriff

Notice of Proposed Termination of Court Case

January 26, 2012

RE: 2007-02096-CD

Pinnacle Credit Services, LLC

Vs.

Carol Nevling

FILED
JAN 26 2012
William A. Shaw
Prothonotary/Clerk of Courts

To All Parties and Counsel:

Please be advised that the Court intends to terminate the above captioned case without notice, because the Court records show no activity in the case for a period of at least two years.

You may stop the Court terminating the case by filing a Statement of Intention to Proceed. The Statement of Intention to Proceed must be filed with the **Prothonotary of Clearfield County, PO Box 549, Clearfield, Pennsylvania 16830**. The Statement of Intention to Proceed must be filed on or before **March 28, 2012**.

If you fail to file the required statement of intention to proceed within the required time period, the case will be terminated.

By the Court,


F. Cortez Bell, III, Esq.
Court Administrator

Our File No.: 146521
APOTHAKER & ASSOCIATES, P.C.
BY: David J. Apothaker, Esquire
Attorney I.D.# 38423
520 Fellowship Road C306
Mount Laurel, NJ 08054
(800) 672-0215
Attorney for Plaintiff

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FEB 27 2012
FILED NO
MFT 07/01 CC
William A. Shaw
Prothonotary/Clerk of Courts
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PINNACLE CREDIT SERVICES LLC) COURT OF COMMON PLEAS
Plaintiff,) CLEARFIELD COUNTY
vs.)
CAROL NEVLING) NO. 07-2096-CD
Defendant.)

)

PRAECIPE TO DISMISS WITHOUT PREJUDICE

TO THE PROTHONOTARY:

Kindly dismiss this action without prejudice.

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

By:

David J. Apothaker, Esquire

Dated: 2/14/2012

