



129195

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY  
PENNSYLVANIA

LUNV Funding LLC  
(Plaintiff)

CIVIL ACTION

c/o 2417 Welsh Road Suite 21 #520

(Street Address)

Phila., PA 19114

(City, State ZIP)

No. 07-2098-CD

Type of Case: CIVIL

Type of Pleading: COMPLAINT

VS.

Filed on Behalf of:

LAURIE A Brochey  
(Defendant)

LUNV Funding LLC  
(Plaintiff/Defendant)

21 E. Long Ave Apt 208  
(Street Address)

Du Bois PA 15801  
(City, State ZIP)

David J. Apothaker, Esquire

(Filed by)

2417. Welsh Road Suite 21 #520

(Address) Phila., PA 19114

215-634-8920

(Phone)

(Signature)

**FILED**

DEC 26 2007

William A. Shaw  
Prothonotary/Clerk of Courts

Att'y pd. 85.00

ICC Sheriff

ICC Att'y

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.

LAURIE A BROCHEY

21 E LONG AVE APT 208

DU BOIS, PA 15801

Defendant.

) COURT OF COMMON PLEAS

) CLEARFIELD COUNTY

)

) NO.:

)

)

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)

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 LAURIE A BROCHEY, an adult individual residing at 21 E LONG AVE APT 208 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 \$2,323.37.

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

9. The original creditor is BANK OF AMERICA.

WHEREFORE, Plaintiff demands judgment in favor of Plaintiff and against Defendant(s) for the sum of \$2,323.37 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: \_\_\_\_\_

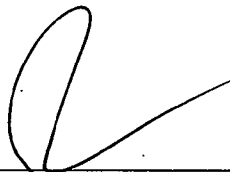
David J. Apothaker

Dated: 12/20/2007

Our File No.: 129195

### 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 loop followed by a horizontal stroke and a diagonal line extending to the right.

---

David J. Apothaker  
Attorney for Plaintiff

DATE: 12/20/2007

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

LAURIE A BROCHEY  
21 E LONG AVE APT 208  
DU BOIS, PA 15801

STATEMENT OF ACCOUNT

|                    |                  |
|--------------------|------------------|
| Debtor's Name:     | LAURIE A BROCHEY |
| Account Number:    | 4319041021703584 |
| Original Creditor: | BANK OF AMERICA  |
| Balance Due:       | \$2,323.37       |

Our File No.: 129195

EXHIBIT "A"

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103579  
NO: 07-2098-CD  
SERVICE # 1 OF 1  
COMPLAINT

PLAINTIFF: LVNV FUNDING, LLC  
vs.  
DEFENDANT: LAURIE A. BROCHEY

FILED

01/31/2008  
MAY 01 2008

William A. Shaw  
Prothonotary/Clerk of Courts

SHERIFF RETURN

NOW, January 11, 2008 AT 9:55 AM SERVED THE WITHIN COMPLAINT ON LAURIE A. BROCHEY DEFENDANT AT 21 E. LONG AVE. APT 208, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO LAURIE BROCHEY, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: NEVLING /

| PURPOSE         | VENDOR   | CHECK # | AMOUNT |
|-----------------|----------|---------|--------|
| SURCHARGE       | APOTHAKE | 69218   | 10.00  |
| SHERIFF HAWKINS | APOTHAKE | 69218   | 37.19  |

Sworn to Before Me This

\_\_\_\_\_ Day of \_\_\_\_\_ 2008

So Answers,

*Chester A. Hawkins*  
by *Marilyn Harris*  
Chester A. Hawkins  
Sheriff



Our File No.: 129195  
APOTHAKE & ASSOCIATES, P.C.  
BY: David J. Apothaker  
Attorney I.D.# 38423  
520 Fellowship Road C306  
Mount Laurel, NJ 08054  
(800) 672-0215

Attorney for Plaintiff

LVNV FUNDING LLC  
|  
vs. Plaintiff,

LAURIE A BROCHEY  
Defendant.

) COURT OF COMMON PLEAS OF  
) CLEARFIELD COUNTY

) NO.: 07-2098-CD

) Civil Action

pd # 20.00 Att  
FILED  
m/12:30pm  
AUG 24 2009  
100 notice to  
draft  
100 notice to  
Att.

William A. Shaw  
Prothonotary/Clerk of Courts

**PRAECIPE FOR DEFAULT JUDGMENT**

TO THE PROTHONOTARY:

Kindly enter judgment against Defendant, LAURIE A BROCHEY, in the default of an Answer, in the amount of \$2,525.74 computed as follows:

|  |           |                 |
|--|-----------|-----------------|
| Amount claimed in complaint:   | \$        | 2,323.37        |
| Less: Amount Paid:   |           | ( 120.00)       |
| Plus: Interest from December 20, 2007 to August 17, 2009 at the legal interest rate of 6.00% per annum |           | 190.18          |
| Costs  |           | 132.19          |
| Attorney fees  |           | 0.00            |
| <b>TOTAL</b>   | <b>\$</b> | <b>2,525.74</b> |

I hereby certify that the appropriate Notices of Default, as attached have been mailed in accordance with Pa.R.Civ.P. 237.1 on the dates indicated on the Notices.

I certify Defendant, LAURIE A BROCHEY, last known address is 21 E LONG AVE APT 208 DU BOIS, PA 15801.

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

By:

David J. Apothaker

Dated: August 17, 2009

OFFICE OF THE PROTHONOTARY  
COURT OF COMMON PLEAS

COPY

TO: LAURIE A BROCHEY  
21 E LONG AVE APT 208  
DU BOIS, PA 15801

|                  |   |                          |
|------------------|---|--------------------------|
| LVNV FUNDING LLC | ) | COURT OF COMMON PLEAS OF |
|                  | ) | CLEARFIELD COUNTY        |
| Plaintiff,       | ) |                          |
| vs.              | ) |                          |
|                  | ) | NO.: 07-2098-CD          |
| LAURIE A BROCHEY | ) |                          |
|                  | ) | Civil Action             |
| Defendant.       | ) |                          |

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**NOTICE**

Pursuant to Rule 236 of the Supreme Court of Pennsylvania, you are hereby notified that a Judgment has been entered against you in the above proceeding as indicated below.

XX JUDGMENT BY DEFAULT

\_\_\_ JUDGMENT IN REPLEVIN

\_\_\_ JUDGMENT BY CONFESSION

\_\_\_ JUDGMENT FOR POSSESSION

\_\_\_ JUDGMENT ON AWARD OF ARBITRATORS

\_\_\_ JUDGMENT ON VERDICT

\_\_\_ JUDGMENT ON COURT FINDINGS

\_\_\_ JUDGMENT ON WRIT OF REVIVAL

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE, PLEASE CALL:

ATTORNEY David J. Apothaker, Esq. at this telephone number: 215-634-8920

*William L. Harmon* 8/24/2009  
Prothonotary

Our File No.: 129195  
APOTHAKE & ASSOCIATES, P.C.  
BY: David J. Apothaker  
Attorney I.D.# 38423  
520 Fellowship Road C306  
Mount Laurel, NJ 08054  
(800) 672-0215  
Attorney for Plaintiff

|                  |   |                          |
|------------------|---|--------------------------|
| LVNV FUNDING LLC | ) | COURT OF COMMON PLEAS OF |
|                  | ) | CLEARFIELD COUNTY        |
| Plaintiff,       | ) |                          |
| vs.              | ) |                          |
|                  | ) | NO.: 07-2098-CD          |
| LAURIE A BROCHEY | ) |                          |
|                  | ) | Civil Action             |
| Defendant.       | ) |                          |
|                  | ) |                          |

**AFFIDAVIT OF NON-MILITARY SERVICE**

COMMONWEALTH OF PENNSYLVANIA :  
: SS.  
COUNTY OF CLEARFIELD :

David J. Apothaker, being duly sworn according to law, deposes and says that I am the attorney for Plaintiff, and authorized to make this affidavit; that Defendant(s) resides at 21 E LONG AVE APT 208 DU BOIS, PA 15801.

We inquired with the web site of the Defense Manpower Data Center, located at 1600 Wilson Boulevard, Suite 400, Arlington, VA 22209-2593, if the Defendant(s) is/are in any branch of the military.

Mary M. Snavely-Dixon, Director of the Defense Manpower Data Center has sent back our inquiry indicated that the Defendant(s) is/are not in the military.

\_\_\_\_\_  
David J. Apothaker  
Attorney for Plaintiff

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

# APOTHAKER & ASSOCIATES, P.C.

ATTORNEYS AT LAW

Department of Defense Manpower Data Center

AUG-17-2009 08:21:04



Military Status Report  
Pursuant to the Servicemembers Civil Relief Act

| Last Name | First/Middle | Begin Date   | Active Duty Status | Service/Agency |
|-----------|--------------|--|--------------------|----------------|
| BROCHEY   | LAURIE A     | Based on the information you have furnished, the DMDC does not possess any information indicating that the individual is currently on active duty. |                    |                |

Upon searching the information data banks of the Department of Defense Manpower Data Center, based on the information that you provided, the above is the current status of the individual as to all branches of the Military.

*Mary M. Snavelly-Dixon*

Mary M. Snavelly-Dixon, Director  
Department of Defense - Manpower Data Center  
1600 Wilson Blvd., Suite 400  
Arlington, VA 22209-2593

The Defense Manpower Data Center (DMDC) is an organization of the Department of Defense that maintains the Defense Enrollment and Eligibility Reporting System (DEERS) database which is the official source of data on eligibility for military medical care and other eligibility systems.

The Department of Defense strongly supports the enforcement of the Servicemembers Civil Relief Act [50 USCS Appx. §§ 501 et seq] (SCRA) (formerly the Soldiers' and Sailors' Civil Relief Act of 1940). DMDC has issued hundreds of thousands of "does not possess any information indicating that the individual is currently on active duty" responses, and has experienced a small error rate. In the event the individual referenced above, or any family member, friend, or representative asserts in any manner that the individual is on active duty, or is otherwise entitled to the protections of the SCRA, you are strongly encouraged to obtain further verification of the person's active duty status by contacting that person's Military Service via the "defenseink.mil" URL provided below. If you have evidence the person is on active duty and you fail to obtain this additional Military Service verification, provisions of the SCRA may be invoked against you.

If you obtain further information about the person (e.g., an SSN, improved accuracy of DOB, a middle name), you can submit your request again at this Web site and we will provide a new certificate for that query.

This response reflects current active duty status only. For historical information, please contact the Military Service SCRA points-of-contact.

See: <http://www.defenseink.mil/faq/pis/PC09SLDR.html>

WARNING: This certificate was provided based on a name and Social Security number (SSN) provided by the requester. Providing an erroneous name or SSN will cause an erroneous certificate to be provided.

Report ID: DDISOACSO

OFFICE OF THE PROTHONOTARY  
COURT OF COMMON PLEAS  
CLEARFIELD COUNTY

LVNV FUNDING LLC

vs.

LAURIE A BROCHEY

) COURT OF COMMON PLEAS  
) CLEARFIELD COUNTY  
)  
)  
) NO. 07-2098-CD  
)

To: LAURIE A BROCHEY  
21 E LONG AVE APT 208  
DU BOIS, PA 15801

**NOTICE, RULE 237.5**  
**NOTICE OF PRAECIPE TO ENTER JUDGMENT BY DEFAULT**

Date of Notice: May 12, 2008


**IMPORTANT NOTICE**

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE, IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. 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 BAR ASSOCIATION  
Lawyer Referral and Information Service  
814-765-2641

  
\_\_\_\_\_  
DAVID J. APOTHAKE, ESQUIRE  
APOTHAKE & ASSOCIATES, PC  
A Law Firm Engaged in Debt Collection  
2417 Welsh Road, Suite 21 #520  
Philadelphia, PA 19114  
(215) 634-8920  
Attorney for Plaintiff  
Attorney ID #38423

129195-2

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103579  
NO: 07-2098-CD  
SERVICE # 1 OF 1  
COMPLAINT

COPY

PLAINTIFF: LVNV FUNDING, LLC  
vs.  
DEFENDANT: LAURIE A. BROCHEY

SHERIFF RETURN

NOW, January 11, 2008 AT 9:55 AM SERVED THE WITHIN COMPLAINT ON LAURIE A. BROCHEY DEFENDANT AT 21 E. LONG AVE. APT 208, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO LAURIE BROCHEY, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

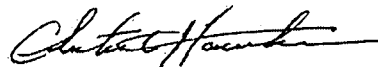
SERVED BY: NEVLING /

| PURPOSE         | VENDOR   | CHECK # | AMOUNT |
|-----------------|----------|---------|--------|
| SURCHARGE       | APOTHAKE | 69218   | 10.00  |
| SHERIFF HAWKINS | APOTHAKE | 69218   | 37.19  |

Sworn to Before Me This

\_\_\_\_ Day of \_\_\_\_\_ 2008

So Answers,



Chester A. Hawkins  
Sheriff