



128354

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY  
PENNSYLVANIA

FILED

FEB 08 2008

W/2:10/6  
William A. Shaw  
Prothonotary/Clerk of Courts

can't to Any  
+  
Shen

LUNV Funding LLC  
(Plaintiff)

CIVIL ACTION

c/o 2417 Welsh Road Suite 21 #520

(Street Address)

Phila., PA 19114

(City, State ZIP)

No. 2008-232-C0

Type of Case: CIVIL

Type of Pleading: COMPLAINT

VS.

Filed on Behalf of:

JEFF SPACKMAN  
(Defendant)

LUNV Funding LLC  
(Plaintiff/Defendant)

116 LAWRENCE GRANGE ROAD  
(Street Address)

CLEARFIELD PA 16830  
(City, State ZIP)

David J. Apothaker, Esquire

(Filed by)

2417. Welsh Road Suite 21 #520

(Address) Phila., PA 19114

215-634-8920

(Phone)

(Signature)

Our File No.: 128356  
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

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

Plaintiff,

vs.

JEFF SPACKMAN  
116 LAWRENCE GRANGE ROAD  
CLEARFIELD, PA 16830-4239

Defendant.

) COURT OF COMMON PLEAS  
) CLEARFIELD COUNTY  
)

) NO.:  
)  
)  
)  
)  
)  
)  
)  
)  
)  
)

#### 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 paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o con un abogado y entregar a la corte en forma escrita sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del edemandante 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 SUFICIENTE 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

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

VS.

) COURT OF COMMON PLEAS  
) CLEARFIELD COUNTY  
)  
) NO.:

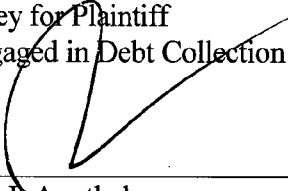
**CIVIL ACTION COMPLAINT  
FIRST COUNT**

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

9. The original creditor is SEARS.

WHEREFORE, Plaintiff demands judgment in favor of Plaintiff and against Defendant(s) for the sum of \$5,954.09 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

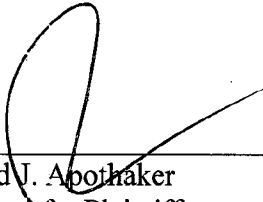
BY:   
David J. Apothaker

Dated: 1/25/2008

Our File No.: 128356

**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.



---

David J. Apothaker  
Attorney for Plaintiff

DATE: 1/25/2008

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

JEFF SPACKMAN  
116 LAWRENCE GRANGE ROAD  
CLEARFIELD, PA 16830-4239

STATEMENT OF ACCOUNT

Debtor's Name:	JEFF SPACKMAN
Account Number:	5121071741042554
Original Creditor:	SEARS
Balance Due:	\$5,954.09

Our File No.: 128356

EXHIBIT "A"

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103745  
NO: 08-232-CD  
SERVICE # 1 OF 1  
COMPLAINT

PLAINTIFF: LVNV FUNDING LLC  
vs.  
DEFENDANT: JEFF SPACKMAN

SHERIFF RETURN

NOW, February 26, 2008 AT 10:20 AM SERVED THE WITHIN COMPLAINT ON JEFF SPACKMAN DEFENDANT AT SHERIFF'S OFFICE, 1 N. 2ND ST., SUITE 116, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO JEFF SPACKMAN, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: HAWKINS /

FILED  
03:12/08  
JUN 04 2008

William A. Shaw  
Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	APOTHAHER	73830	10.00
SHERIFF HAWKINS	APOTHAHER	73830	23.00

Sworn to Before Me This

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

\_\_\_\_\_

So Answers,

*Chester A. Hawkins*  
*by Maury Harris*

Chester A. Hawkins  
Sheriff

Our File No.: 128356  
APOTHAKE & ASSOCIATES, P.C.  
BY: David J. Apothaker  
Attorney I.D.# 38423  
2417 Welsh Road, Suite 21 #520  
Philadelphia, PA 19114  
(215) 634-8920  
Attorney for Plaintiff

**FILED**

JUN 16 2008

W/12306W  
William A. Shaw  
Prothonotary/Clerk of Courts

1 Clerk to AP

LVNV FUNDING, LLC

Plaintiff,

vs.

JEFF SPACKMAN

Defendant.

) COURT OF COMMON PLEAS  
) CLEARFIELD COUNTY  
)  
)  
)  
)  
)  
)  
)  
)

) NO. 2008-232-CD  
)  
)  
)  
)  
)  
)  
)  
)  
)

**PRAECIPE TO DISMISS WITHOUT PREJUDICE**

TO THE PROTHONOTARY:

Kindly dismiss this action without prejudice.

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

By:

David J. Apothaker

Dated: June 9, 2008

**FILED**  
**JUN 16 2008**  
William A. Shaw  
Prothonotary/Clerk of Courts