

08-365-CD
LVNV Funding vs Bruce Berquist

122112

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

LUNV Funding LLC CIVIL ACTION
(Plaintiff)

c/o 2417 Welsh Road Suite 21 #520

(Street Address)

Phila., PA 19114

(City, State ZIP)

No. 08-365-CD

Type of Case: CIVIL

Type of Pleading: COMPLAINT

VS.

Filed on Behalf of:

Bruce Berquist
(Defendant)

LUNV Funding LLC
(Plaintiff) Defendant

601 W. Washington Ave
(Street Address)

DuBois 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

m12.40.00
FEB 29 2008

Att'y pd. 95.00

cc Att'y

1cc Sheriff

William A. Shaw
Prothonotary/Clerk of Courts

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.

BRUCE BERQUIST

601 W WASHINGTON AVE

DU BOIS, PA 15801-1637

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 BRUCE BERQUIST, an adult individual residing at 601 W WASHINGTON AVE DU BOIS, PA 15801-1637.
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 \$4,410.74.

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 \$4,410.74 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: 2/12/2008

Our File No.: 122112

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: 2/12/2008

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

BRUCE BERQUIST
601 W WASHINGTON AVE
DU BOIS, PA 15801-1637

STATEMENT OF ACCOUNT

Debtor's Name:	BRUCE BERQUIST
Account Number:	5049948033467178
Original Creditor:	SEARS
Balance Due:	\$4,410.74

Our File No.: 122112

EXHIBIT "A"

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103832
NO: 08-365-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: LVNV FUNDING LLC
vs.
DEFENDANT: BRUCE BERQUIST

SHERIFF RETURN

NOW, March 24, 2008 AT 11:08 AM SERVED THE WITHIN COMPLAINT ON BRUCE BERQUIST DEFENDANT AT 601 W. WASHINGTON AVE., DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO BRENT BERQUIST, SON A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: NEVLING / COUDRIET

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	APOTHAKE	76477	10.00
SHERIFF HAWKINS	APOTHAKE	76477	37.19

FILED


03:40pm
JUN 25 2008

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

_____ Day of _____ 2008

So Answers,


Chester A. Hawkins
Sheriff

Our File No.: 122112
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

FILED

OCT 16 2008

m/11:30/
William A. Shaw
Prothonotary/Clerk of Courts

1 cent to Att

LVNV FUNDING, LLC

Plaintiff,

vs.

BRUCE BERQUIST.

Defendant.

) COURT OF COMMON PLEAS

) CLEARFIELD COUNTY

) NO. 08-365-CD

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: October 10, 2008

9

FILED

OCT 16 2008

William A. Shaw
Prothonotary/Clerk of Courts