

08-449-CD

LNVN Funding vs Debora Conklin

144043

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY  
PENNSYLVANIA

LVNV Funding LLC CIVIL ACTION  
(Plaintiff)

c/o 2417 Welsh Road Suite 21 #520

(Street Address)

Phila., PA 19114

(City, State ZIP)

No. 08-449-CD

Type of Case: CIVIL

Type of Pleading: COMPLAINT

VS.

Filed on Behalf of:

Deborah Cowlin  
(Defendant)

LVNV Funding LLC  
(Plaintiff/Defendant)

1241 Conndon Rd.

(Street Address)

New Mill port PA 16861

(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 Atty pd.  
M 13 15 01 05.00  
MAR 13 2008

William A. Shaw

Prothonotary/Clerk of Courts

WMA  
ICCA Atty  
ICCA Sheriff

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 Apotheker & Associates, P.C.  
2417 Welsh Road, Suite 21 #520  
Philadelphia, PA 19114

Plaintiff,  
vs.

DEBORA CONKLIN  
1241 CONDDON RD  
NEW MILLPORT, PA 16861-9249  
Defendant.

**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 DEBORA CONKLIN, an adult individual residing at 1241 CONDDON RD NEW MILLPORT, PA 16861-9249.
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 \$2,217.89.

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 \$2,217.89 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

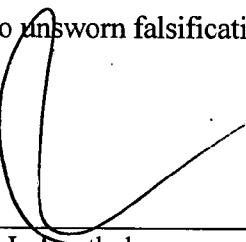
BY: \_\_\_\_\_  
David J. Apothaker

Dated: 2/26/2008

Our File No.: 144043

**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: 2/26/2008

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

DEBORA CONKLIN  
1241 CONDDON RD  
NEW MILLPORT, PA 16861-9249

STATEMENT OF ACCOUNT

Debtor's Name: DEBORA CONKLIN  
Account Number: 5049948001354382  
Original Creditor: SEARS  
Balance Due: \$2,217.89

Our File No.: 144043

EXHIBIT "A"

FILED

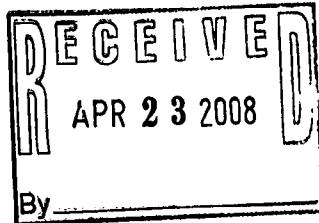
Our file No.: 144043-2  
APOTHAKER & ASSOCIATES, P.C.  
2417 Welsh Road, Suite 21 #520  
Philadelphia, PA 19114  
(215) 634-8920  
Attorneys for Plaintiff  
Attorney ID # 38423

MAY 16 2008  
M 11:30 am  
William A. Shaw  
Prothonotary/Clerk of Courts

1 Wens to

ATT

(60)



LVNV FUNDING LLC

Plaintiff,

vs.

DEBORA CONKLIN

Defendant.

) COURT OF COMMON PLEAS  
 ) CLEARFIELD COUNTY  
 )  
 ) DOCKET NO.: 08-449-CD  
 )  
 ) Civil Action  
 )  
 ) STIPULATION IN LIEU OF JUDGMENT  
 )  
 )

The matters and things in controversy having been discussed by and between the parties, and a settlement having been agreed upon:

It is on April 15, 2008, STIPULATED by and between Plaintiff, LVNV FUNDING LLC, and Defendant, DEBORA CONKLIN parties as follows:

1. Defendant agrees to pay the sum of \$2,186.02, which sum Plaintiff agrees to accept in full settlement of its claim herein, inclusive of interest, counsel fees and court costs.

2. The sum aforesaid shall be paid by Defendant, DEBORA CONKLIN, to the attorneys for Plaintiff in the following manner:

- a. Payment of \$242.00 to be paid on or before April 15, 2008.
- b. Payment of \$50.00 due on or before the fifteenth of every month starting May 15, 2008 and continuing each month thereafter until balance is paid in full.

All checks are to be made payable to LVNV FUNDING LLC, and sent to:

Apothaker & Associates, P.C.  
520 Fellowship Road C306  
Mount Laurel, NJ 08054

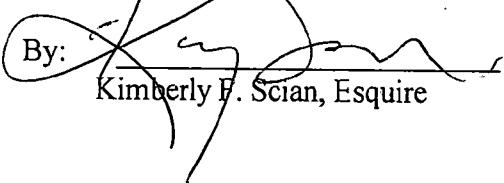
3. In the event Defendant, DEBORA CONKLIN fails to pay in accordance with the terms set forth in this Stipulation, then, and in that event, Plaintiff must notify Defendant DEBORA CONKLIN.

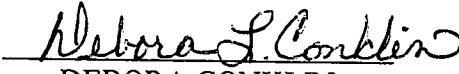
4. If the default is not cured within 15 days after written notice to the Defendant's attorneys, then Plaintiff has the right to obtain the entry of Judgment against Defendant, DEBORA CONKLIN, ex parte, in the sum of \$2,186.02 giving Defendant, DEBORA CONKLIN credit for any sums actually paid pursuant to the terms of this Stipulation.

We hereby consent to the form and entry of the within Stipulation.

APOTHAKER & ASSOCIATES  
Attorneys for Plaintiff  
A Law Firm Engaged in Debt Collection

By:

  
Kimberly F. Scian, Esquire

  
DEBORA CONKLIN

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103887  
NO: 08-449-CD  
SERVICE # 1 OF 1  
COMPLAINT

PLAINTIFF: LNV FUNDING LLC  
VS.  
DEFENDANT: DEBORA CONKLIN

**SHERIFF RETURN**

NOW, April 02, 2008 AT 11:02 AM SERVED THE WITHIN COMPLAINT ON DEBORA CONKLIN DEFENDANT AT 1241 CONDDON RD, NEW MILLPORT, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO DEBORA CONKLIN, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DAVIS / MORGILLO

**FILED**

03/00 AM  
JUL 02 2008

William A. Shaw  
Prothonotary/Clerk of Courts



PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	APOTHAKER	78642	10.00
SHERIFF HAWKINS	APOTHAKER	78642	31.13

Sworn to Before Me This

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

So Answers,

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

Our File No.: 144043  
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  
JAN 18 2011  
William A. Shaw  
Prothonotary/Clerk of Courts

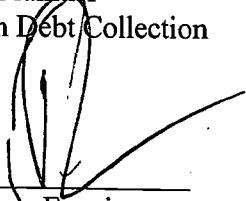
LVNV FUNDING LLC ) COURT OF COMMON PLEAS  
vs. Plaintiff, ) CLEARFIELD COUNTY  
DEBORA CONKLIN )  
Defendant. ) NO. 08-449-CD

**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: 1/6/2011



\* Q 1 4 4 0 4 3 D I S N 1 - \*