

08-453-CD
LVNV Funding vs Lisa Moore

123968

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. 08-453-CD

Type of Case: CIVIL

Type of Pleading: COMPLAINT

VS.

LISA MOORE

(Defendant)

817 W Long Ave

(Street Address)

Du Bois PA 15801

(City, State ZIP)

Filed on Behalf of:

LUNV Funding LLC
(Plaintiff/Defendant)

MARCH 27, 2009 Document
Reinstated/Reissued to Sheriff/Attorney
for service.

William A. Shaw
Deputy Prothonotary

David J. Apothaker, Esquire

(Filed by)

2417 Welsh Road Suite 21 #520

(Address) Phila., PA 19114

215-634-8920

(Phone)

January 27, 2009 Document
Reinstated/Reissued to Sheriff/Attorney
for service.

(Signature)

William A. Shaw
Deputy Prothonotary

FILED

MAR 13 2009

William A. Shaw
Prothonotary/Clerk of Courts

ICC Attorney
ICC Sheriff

October 20, 2008 Document
Reinstated/Reissued to Sheriff/Attorney
for service.

William A. Shaw
Deputy Prothonotary

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

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 \$6,561.73 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: _____

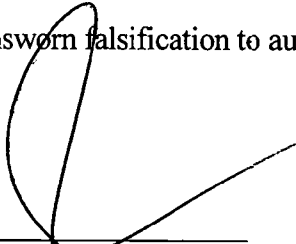
David J. Apothaker

Dated: 2/26/2008

Our File No.: 123968

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

LISA MOORE
817 W LONG AVE
DU BOIS, PA 15801-1734

STATEMENT OF ACCOUNT

Debtor's Name:	LISA MOORE
Account Number:	5121071859940441
Original Creditor:	SEARS
Balance Due:	\$6,561.73

Our File No.: 123968

EXHIBIT "A"

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 1 of 1 Services

Sheriff Docket # **103891**

LVNV FUNDING LLC

Case # 08-453-CD

vs.

LISA MOORE

TYPE OF SERVICE COMPLAINT

SHERIFF RETURNS

NOW July 07, 2008 RETURNED THE WITHIN COMPLAINT "NOT SERVED, TIME EXPIRED" AS TO LISA MOORE, DEFENDANT. DEFENDANT WAS TO COME IN TO PICK UP COMPLAINT

NEW ADDRESS: 912 W. WEBER AVE., DUBOIS, PA.
CELL # 814-771-2757

SERVED BY: /

Return Costs

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	APOTHAKE	78638	10.00
SHERIFF HAWKINS	APOTHAKE	78638	52.38

FILED

0/2:20cm

JUL 07 2008

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before me This

_____ Day of _____ 2008

So Answers,

Chester A. Hawkins
Chester A. Hawkins
Sheriff

123968

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. 08-453-CD

Type of Case: CIVIL

Type of Pleading: COMPLAINT

VS.

LISA MOORE

(Defendant)

817 W Long Ave

(Street Address)

Du Bois PA 15801

(City, State ZIP)

Filed on Behalf of:

LUNV Funding LLC
(Plaintiff/Defendant)

David J. Apothaker, Esquire

(Filed by)

2417. Welsh Road Suite 21 #520

(Address) Phila., PA 19114

215-634-8920

(Phone)

I hereby certify this to be a true
and attested copy of the original
statement filed in this case.

MAR 13 2008

Attest.

William L. Shaw
Prothonotary/
Clerk of Courts

(Signature)

Our File No.: 123968
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)	COURT OF COMMON PLEAS
c/o Apothaker & Associates, P.C.)	CLEARFIELD COUNTY
2417 Welsh Road, Suite 21 #520)	
Philadelphia, PA 19114)	NO.:
Plaintiff,)	
vs.)	
)	
LISA MOORE)	
817 W LONG AVE)	
DU BOIS, PA 15801-1734)	
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 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. Ademias, 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

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

Plaintiff,

vs.

LISA MOORE
817 W LONG AVE
DU BOIS, PA 15801-1734

Defendant.

) COURT OF COMMON PLEAS
) CLEARFIELD COUNTY

) NO.:

CIVIL ACTION COMPLAINT
FIRST COUNT

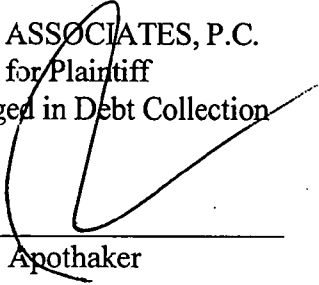
1. Plaintiff, LVNV FUNDING, LLC, is a company with its principal place of business located at c/o Apothaker & Associates, P.C., 2417 Welsh Road, Suite 21 #520, Philadelphia, PA 19114.
2. Defendant is LISA MOORE, an adult individual residing at 817 W LONG AVE DU BOIS, PA 15801-1734.
3. At the special 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 \$6,561.73.

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 \$6,561.73 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

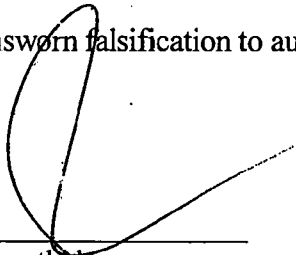
BY: 
David J. Apothaker

Dated: 2/26/2008

Our File No.: 123968

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

LISA MOORE
817 W LONG AVE
DU BOIS, PA 15801-1734

STATEMENT OF ACCOUNT

Debtor's Name:	LISA MOORE
Account Number:	5121071859940441
Original Creditor:	SEARS
Balance Due:	\$6,561.73

Our File No.: 123968

EXHIBIT "A"

Our File No.: 123968
APOTHAKER & 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
Plaintiff,)	CLEARFIELD COUNTY
vs.)	
)	
LISA MOORE)	NO.: 08-453-CD
)	
Defendant.)	
)	

PRAECIPE TO
REINSTATE COMPLAINT - CIVIL ACTION

TO THE PROTHONOTARY:

Kindly reinstate the Complaint in the above captioned Civil Action for an additional thirty (30) days.

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

BY: _____
David J. Apothaker, Esquire

Dated: 10/13/2008

5
FILED pd \$7.00 Att
m/12:20 1cc & 1 reinstated
OCT 20 2008 Complaint to
LM Att.
William A. Shaw
Prothonotary/Clerk of Courts

123968-7

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. 08-453-CD

Type of Case: CIVIL

Type of Pleading: COMPLAINT

VS.

LISA MOORE

(Defendant)

817 W Long Ave

(Street Address)

Du Bois PA 15801

(City, State ZIP)

Filed on Behalf of:

LUNV Funding LLC
(Plaintiff/Defendant)

David J. Apothaker, Esquire

(Filed by)

2417 Welsh Road Suite 21 #520

(Address) Phila., PA 19114

215-634-8920

(Phone)

I hereby certify this to be a true
and attested copy of the original
statement filed in this case.

(Signature)

MAR 13 2008

Attest.

William A. Brown
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)	COURT OF COMMON PLEAS
c/o Apothaker & Associates, P.C.)	CLEARFIELD COUNTY
2417 Welsh Road, Suite 21 #520)	
Philadelphia, PA 19114)	NO.:
Plaintiff,)	
vs.)	
)	
LISA MOORE)	
817 W LONG AVE)	
DU BOIS, PA 15801-1734)	
Defendant.)	
)	

CIVIL ACTION COMPLAINT
FIRST COUNT

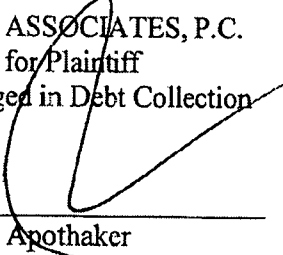
1. Plaintiff, LVNV FUNDING, LLC, is a company with its principal place of business located at c/o Apothaker & Associates, P.C., 2417 Welsh Road, Suite 21 #520, Philadelphia, PA 19114.
2. Defendant is LISA MOORE, an adult individual residing at 817 W LONG AVE DU BOIS, PA 15801-1734.
3. At the special 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 \$6,561.73.

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 \$6,561.73 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

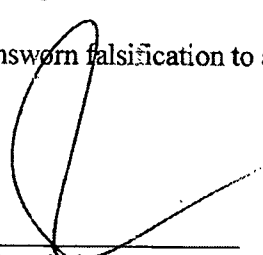
BY: 
David J. Apothaker

Dated: 2/26/2008

Our File No.: 123968

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

LISA MOORE
817 W LONG AVE
DU BOIS, PA 15801-1734

STATEMENT OF ACCOUNT

Debtor's Name:	LISA MOORE
Account Number:	5121071859940441
Original Creditor:	SEARS
Balance Due:	\$6,561.73

Our File No.: 123968

EXHIBIT "A"

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 1 of 1 Services

Sheriff Docket # 104827

LVNV FUNDING,LLC

Case # 08-453-CD

vs.

LISA MOORE

TYPE OF SERVICE REINSTATED COMPLAINT

SHERIFF RETURNS

5
FILED
DEC 03 2008
William A. Shaw
Prothonotary/Clerk of Courts

NOW December 03, 2008 RETURNED THE WITHIN REINSTATED COMPLAINT "NOT SERVED, TIME EXPIRED" AS TO LISA MOORE, DEFENDANT. WRONG ADDRESS WAS GIVEN TO DEPUTY TO ATTEMPT SERVICE

SERVED BY: /


Return Costs

PURPOSE	VENDOR NO COSTS	CHECK #	AMOUNT
---------	--------------------	---------	--------

Sworn to Before me This

_____ Day of _____ 2008

So Answers,


Chester A. Hawkins
Sheriff

123968-7
SUPERIOR COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

BY: David J. Apothaker, Esq.

Address: ID# 1114

2417 Welsh Road, Suite 21 #520

Philadelphia, PA 19114

(215) 634-8920

Attorneys for Plaintiff

LUNV Funding LLC (Plaintiff)
c/o Apothaker & Associates, P.C. CLEARFIELD COUNTY

2417 Welsh Road Suite 21 #520

Philadelphia, PA 19114 (Street Address)

Case No. 08-453-CD

Phila., PA 19114

Type of Case: CIVIL

(City, State ZIP)

Type of Pleading: COMPLAINT

817 W LONG AVE

PHILA PA 19114

VS.

Filed on Behalf of:

LISA MOORE
(Defendant)

LUNV Funding LLC
(Plaintiff/Defendant)

You wish to defend against the claims set forth in the following pages, you must take action with 817 W Long Ave served, by entering a written appearance personally or by attorney and filing in writing (Street Address) or objections to the claims set forth against you. You are warned that if you fail to do so the court may enter a judgment against you by the court without further notice for any money claim or other rights asserted by the plaintiff. You may lose money or property or other rights important to you. (City, State, ZIP) YOU MUST TAKE ACTION 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

Legal and Information Service

814-765-2641

David J. Apothaker, Esquire

(Filed by)

Si desea defenderse contra las demandas establecidas en las siguientes paginas, usted debe tomar accion con un abogado y comparecer a la corte en forma escrita por escrito en la corte en el momento de la demanda. Si no se defiende, la corte puede emitir un juicio en su contra sin necesidad de mas aviso. Usted puede perder dinero o otros derechos importantes por no defenderse. Usted debe ir a su abogado o al abogado de la corte inmediatamente. Si no tiene abogado o no puede pagar uno, vaya o llame a la oficina de asistencia legal de la corte. (Ciudad, Estado, ZIP) 2417 Welsh Road Suite 21 #520 Philadelphia, PA 19114

LLEVE ESTA DEMANDA A UN ABOGADO SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO. (Phone) PERSONA O LLAME PARA UNO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA MAS INFORMACION DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

I hereby certify this to be a true and attested copy of the original statement filed in this case.

CLEARFIELD COUNTY BAR ASSOCIATION

Legal and Information Service

814-765-2641

MAR 13 2008

October 20 2008 Document

Reinstated/Reissued to Sheriff/Attorney for service.

Attest.

William L. Prothonotary
Clerk of Courts

Deputy Prothonotary

Our File No.: 123968
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
Plaintiff,)	CLEARFIELD COUNTY
vs.)	
)	
LISA MOORE)	NO.: 08-453-CD
)	
Defendant.)	
)	

PRAECIFE TO
REINSTATE COMPLAINT - CIVIL ACTION

TC THE PROTHONOTARY:

Kindly reinstate the Complaint in the above captioned Civil Action for an additional thirty (30) days.

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

BY: _____
David J. Apothaker, Esquire

Dated: 1/9/2009

FILED
JAN 27 2009
William A. Shaw
Prothonotary/Clerk of Courts
pd \$7.00 Atty
m/11:35 am Complaint to Atty.
ICC + I reinstated

Our File No.: 123968
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)	COURT OF COMMON PLEAS
c/o Apothaker & Associates, P.C.)	CLEARFIELD COUNTY
2417 Welsh Road, Suite 21 #520)	
Philadelphia, PA 19114)	NO.:
Plaintiff,)	
vs.)	
)	
LISA MOORE)	
817 W LONG AVE)	
DU BOIS, PA 15801-1734)	
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 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

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.

LISA MOORE

817 W LONG AVE

DU BOIS, PA 15801-1734

Defendant.

) COURT OF COMMON PLEAS

) CLEARFIELD COUNTY

)

) NO.:

)

)

)

)

)

)

)

)

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 LISA MOORE, an adult individual residing at 817 W LONG AVE DU BOIS, PA 15801-1734.

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".

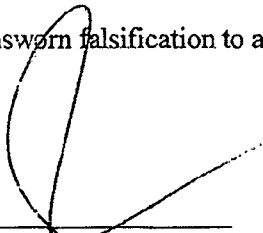
5. The prices set forth in Exhibit "A" are the fair, reasonable and market prices for said goods and/or services, and the prices which Defendant agreed to pay.

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 \$6,561.73.

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

LISA MOORE
817 W LONG AVE
DU BOIS, PA 15801-1734

STATEMENT OF ACCOUNT

Debtor's Name:	LISA MOORE
Account Number:	5121071859940441
Original Creditor:	SEARS
Balance Due:	\$6,561.73

Our File No.: 123968

EXHIBIT "A"

123968-7
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. 08-453-CD

Type of Case: CIVIL

Type of Pleading: COMPLAINT

VS.

LISA MOORE
(Defendant)

817 W Long Ave
(Street Address)

Du Bois PA 15801
(City, State ZIP)

Filed on Behalf of:

LUNV Funding LLC
(Plaintiff/Defendant)

David J. Apothaker, Esquire

(Filed by)

2417 Welsh Road Suite 21 #520

(Address) Phila., PA 19114

215-534-8920

(Phone)

I hereby certify this to be a true
and attested copy of the original
statement filed in this case.

(Signature)

MAR 13 2008

Attest.

William A. Brown
Prothonotary/
Clerk of Courts

Our File No.: 123968
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.

LISA MOORE
817 W LONG AVE
DU BOIS, PA 15801-1734
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

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

vs.

LISA MOORE
817 W LONG AVE
DU BOIS, PA 15801-1734
Defendant.

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

CIVIL ACTION COMPLAINT
FIRST COUNT

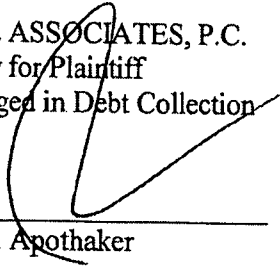
1. Plaintiff, LVNV FUNDING, LLC, is a company with its principal place of business located at c/o Apothaker & Associates, P.C., 2417 Welsh Road, Suite 21 #520, Philadelphia, PA 19114.
2. Defendant is LISA MOORE, an adult individual residing at 817 W LONG AVE DU BOIS, PA 15801-1734.
3. At the special 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 \$6,561.73.

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 \$6,561.73 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

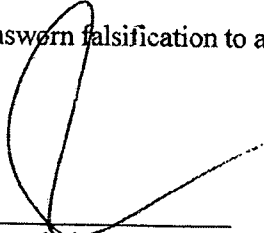
BY: 
David J. Apothaker

Dated: 2/26/2008

Our File No.: 123968

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

LISA MOORE
817 W LONG AVE
DU BOIS, PA 15801-1734

STATEMENT OF ACCOUNT

Debtor's Name:	LISA MOORE
Account Number:	5121071859940441
Original Creditor:	SEARS
Balance Due:	\$6,561.73

Our File No.: 123968

EXHIBIT "A"

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-453-CD

LVNV FUNDING LLC
vs
LISA MOORE

SERVICE # 1 OF 1

PRAECIPE & COMPLAINT

George Gasbanc 771-9052.

SERVE BY: 02/26/2009 HEARING: PAGE: 105206

DEFENDANT: LISA MOORE
ADDRESS: 817 W LONG AVE.
DUBOIS, PA 15801

ALTERNATE ADDRESS ~~ALSO TRY: 812 W WEBER AVE DUBOIS PA 15801~~ W2056 #

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT OCCUPIED

ATTEMPTS 2-11-09 - 11:33 AM - Not Home Left Notice @ W. Long
2-18-09 - 10:34 AM N/A 2-19-09 - 2:16 PM - N/A
SHERIFF'S RETURN

NOW, _____ AT _____ AM / PM SERVED THE WITHIN

PRAECIPE & COMPLAINT ON LISA MOORE, DEFENDANT

BY HANDING TO _____

A TRUE AND ATTESTED COPY OF THE ORIGINAL DOCUMENT AND MADE KNOW TO HIM / HER THE CONTENTS THEREOF.

ADDRESS SERVED _____

FILED

NOW _____ AT _____ AM / PM POSTED THE WITHIN

0/8:35 am
MAR -2 2009

PRAECIPE & COMPLAINT FOR LISA MOORE

AT (ADDRESS) _____

William A. Shaw
Prothonotary/Clerk of Courts

NOW 3/2/09 AT 8:30 AM PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF NOT FOUND AS TO LISA MOORE

REASON UNABLE TO LOCATE Defendant not home (MULTIPLE ATTEMPTS)

SWORN TO BEFORE ME THIS

_____ DAY OF _____ 2009

So Answers: CHESTER A. HAWKINS, SHERIFF

BY: Jerome M. Newlin
Deputy Signature

Jerome M. Newlin
Print Deputy Name

**SHERIFF'S OFFICE
CLEARFIELD COUNTY
CASE # 105206**

DEAR LISA MOORE

Would you please contact the Sheriff's Office EXTENSION **1360** concerning legal papers we have for you

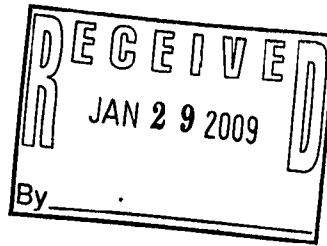
When you call, please give your name and the case # noted above (**105206**) and someone in the Office will be able to help you.

Thank you for your consideration in this matter.

SHERIFF CHESTER A. HAWKINS

OFFICE HOURS: 8:30 A.M. to 4:00 P.M.
PHONE (814) 765-2641

Our File No.: 123968
APOTHAKER & 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
Plaintiff,)	CLEARFIELD COUNTY
vs.)	
)	
LISA MOORE)	NO.: 08-453-CD
Defendant.)	
)	

PRAECIPE TO
REINSTATE COMPLAINT - CIVIL ACTION

TO THE PROTHONOTARY:

Kindly reinstate the Complaint in the above captioned Civil Action for an additional thirty (30) days.

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

BY: _____
David J. Apothaker, Esquire

Dated: 1/9/2009

I hereby certify this to be a true
and attested copy of the original
statement filed in this case.

JAN 27 2009

Attest.

William A. Shaw
Prothonotary/
Clerk of Courts

123968-7
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. 08-453-CD

Type of Case: CIVIL

Type of Pleading: COMPLAINT

VS.

LISA MOORE

(Defendant)

817 W Long Ave

(Street Address)

Du Bois PA 15801

(City, State ZIP)

Filed on Behalf of:

LUNV Funding LLC
(Plaintiff/Defendant)

David J. Apothaker, Esquire

(Filed by)

2417. Welsh Road Suite 21 #520

(Address) Phila., PA 19114

215-634-8920

(Phone)

I hereby certify this to be a true
and attested copy of the original
statement filed in this case.

(Signature)

MAR 13 2008

Attest.

William A. [Signature]
Prothonotary/
Clerk of Courts

January 27, 2009 Document
Reinstated/Reissued to Sheriff/Attorney
for service.

William A. [Signature]
Deputy Prothonotary

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

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

LISA MOORE
817 W LONG AVE
DU BOIS, PA 15801-1734
Defendant.

**CIVIL ACTION COMPLAINT
FIRST COUNT**

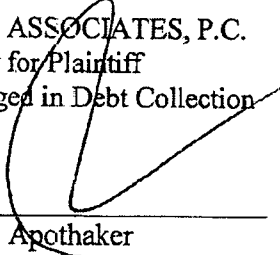
1. Plaintiff, LVNV FUNDING, LLC, is a company with its principal place of business located at c/o Apothaker & Associates, P.C., 2417 Welsh Road, Suite 21 #520, Philadelphia, PA 19114.
2. Defendant is LISA MOORE, an adult individual residing at 817 W LONG AVE DU BOIS, PA 15801-1734.
3. At the special 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 \$6,561.73.

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 \$6,561.73 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

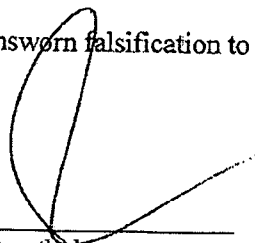
BY: 
David J. Apothaker

Dated: 2/26/2008

Our File No.: 123968

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

LISA MOORE
817 W LONG AVE
DU BOIS, PA 15801-1734

STATEMENT OF ACCOUNT

Debtor's Name:	LISA MOORE
Account Number:	5121071859940441
Original Creditor:	SEARS
Balance Due:	\$6,561.73

Our File No.: 123968

EXHIBIT "A"

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 105206
NO: 08-453-CD
SERVICES 1
PRAECIPE & COMPLAINT

PLAINTIFF: LVNV FUNDING LLC
vs.
DEFENDANT: LISA MOORE

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	APOTHAKE	119120	10.00
SHERIFF HAWKINS	APOTHAKE	119120	90.00

FILED

13:21
APR 07 2009

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

____ Day of _____ 2009

So Answers,



Chester A. Hawkins
Sheriff

Our File No.: 123968
APOTHAKER & 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

FILED

MAR 22 2010

William A. Shaw
Prothonotary/Clerk of Courts

Reinstated
Complaint
To Att

LVNV FUNDING, LLC) COURT OF COMMON PLEAS
Plaintiff,) CLEARFIELD COUNTY
vs.)
)
)
)
LISA MOORE) NO.: 08-453-CD
)
Defendant.)
)

PRAECIPE TO
REINSTATE COMPLAINT - CIVIL ACTION

TO THE PROTHONOTARY:

Kindly reinstate the Complaint in the above captioned Civil Action for an
additional thirty (30) days.

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

BY: _____
David J. Apothaker, Esquire

Dated: 3/11/2010

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-453-CD

LVNV FUNDING, LLC

vs

LISA MOORE

SERVICE # 1 OF 1

PRAECIPE & COMPLAINT

SERVE BY: 04/21/2010

HEARING:

PAGE: 106930

DEFENDANT:

LISA MOORE

ADDRESS:

912 W. WEBER AVE.

DUBOIS, PA 15801

ALTERNATE ADDRESS

PHONE: 771-271-571

- WRONG PHONE #

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

OCCUPIED

ATTEMPTS

4-8-10 - 11:30 AM

Phone Dtg Left

Message on Phone

4-9-10 - 2:24 PM

NH Left Notice

(MOVED OUT OF STATE)

SHERIFF'S RETURN

NOW, _____ AT _____ AM / PM **SERVED** THE WITHIN

PRAECIPE & COMPLAINT ON LISA MOORE, DEFENDANT

BY HANDING TO _____ / _____

A TRUE AND ATTESTED COPY OF THE ORIGINAL DOCUMENT AND MADE KNOW TO HIM / HER THE CONTENTS THEREOF.

ADDRESS SERVED _____

NOW _____ AT _____ AM / PM **POSTED** THE WITHIN

PRAECIPE & COMPLAINT FOR LISA MOORE

AT (ADDRESS) _____

NOW 4-19-10 AT 3:50 AM (PM) AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF **NOT FOUND** AS TO LISA MOORE

REASON UNABLE TO LOCATE MOVED OUT OF STATE

SWORN TO BEFORE ME THIS

_____ DAY OF _____ 2010

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

Jerome M. Newlin
Deputy Signature

Jerome M. Newlin
Print Deputy Name

FILED

9/3:52cm

APR 19 2010

William A. Shaw
Prothonotary/Clerk of Courts

04-15-2010

Our File No.: 123968
APOTHAKE & 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

LVNV FUNDING, LLC)	COURT OF COMMON PLEAS
)	CLEARFIELD COUNTY
Plaintiff,)	
vs.)	
)	
LISA MOORE)	NO. 08-453-CD
)	
Defendant.)	
)	

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, Esquire

Dated: 4/16/2010

FILED 1cc
m/11.16.10
APR 22 2010
William A. Shaw
Prothonotary/Clerk of Courts
Apothaker

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 106930
NO: 08-453-CD
SERVICES 1
PRAECIPE & COMPLAINT

PLAINTIFF: LVNV FUNDING, LLC
vs.
DEFENDANT: LISA MOORE

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	APOTHAKE	175321	10.00
SHERIFF HAWKINS	APOTHAKE	175321	43.00

S
FILED
92:10Lm
DEC 21 2010
William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

_____ Day of _____ 2010

So Answers,

Chester A. Hawkins

Chester A. Hawkins
Sheriff