

08-479-CD  
Worldwide Asset vs Richard Kerstetter II

Burton Neil & Associates, P.C.  
By: Derek C. Blasker, Esquire ID. NO. 202150  
1060 Andrew Drive, Suite 170  
West Chester, PA 19380  
(610) 696-2120  
Attorney for Plaintiff

WORLDWIDE ASSET PURCHASING, II , LLC : IN THE COURT OF COMMON PLEAS  
9911 Covington Cross Dr.  
Las Vegas NV 89144

FILED *at \$95.00 Atty  
m 12:35pm MAR 17 2008*  
ICC to Shf.  
William A. Shaw  
Prothonotary/Clerk of Courts

Plaintiff : CLEARFIELD COUNTY, PENNSYLVANIA  
v.

RICHARD L KERSTETTER II : NO. *08-479-CD*  
713 W Weber Avenue, Du Bois PA 15801  
Defendant : CIVIL ACTION - LAW

#### **Complaint - 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 (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 claim 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. 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.**

#### **LAWYER REFERENCE AND INFORMATION SERVICE**

David S. Meholic  
Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
Telephone No. 814-765-2641 Ext. 5982

Burton Neil & Associates, P.C.  
By: Derek C. Blasker, Esquire ID. NO. 202150  
1060 Andrew Drive, Suite 170  
West Chester, PA 19380  
(610) 696-2120

Attorney for Plaintiff

WORLDWIDE ASSET PURCHASING, II, LLC: IN THE COURT OF COMMON PLEAS  
9911 Covington Cross Dr.  
Las Vegas NV 89144

Plaintiff : CLEARFIELD COUNTY, PENNSYLVANIA  
v.

RICHARD L KERSTETTER II : NO.  
713 W Weber Avenue, Du Bois PA 15801  
Defendant : CIVIL ACTION - LAW

### **Complaint**

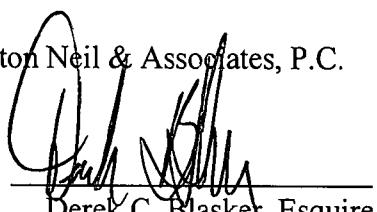
1. The plaintiff is WORLDWIDE ASSET PURCHASING, II, LLC with place of business located at 9911 Covington Cross Dr., Las Vegas NV.
2. The defendant is Richard L Kerstetter II, who resides at 713 W Weber Avenue, Du Bois, Clearfield County, Pennsylvania.
3. A Bank of America credit card was issued to the defendant with account number 4427103010863545 hereinafter referred to as the credit card account.
4. Defendant accepted the credit card by making purchases, balance transfers and/or cash advances.
5. Monthly statements were sent to defendant each month which detailed the charges and credits made to the credit card account for the prior month.
6. The balance due on the credit card account is \$20,537.51.
7. Defendant did not pay the balance due on the credit card account in full upon receipt of the monthly billing statements and also did not make the required minimum monthly payment set forth in the monthly billing statement. As such, defendant is in default on the credit card account.

8. Plaintiff purchased defendant's account and is now the holder and owner of the account.

9. Although demand was made by plaintiff upon defendant to pay the sum of \$20,537.51, defendant failed and refused to pay all or any part thereof.

Wherefore, plaintiff demands judgment against defendant in the sum of \$20,537.51 and the costs of this action.

Burton Neil & Associates, P.C.

By: 

Derek C. Blaske, Esquire  
Attorney for Plaintiff

The law firm of Burton Neil & Associates, P.C. is a debt collector.

**Verification**

I, Mark Campbell am an employee of Gerald E. Moore & Associates, P.C. by contract the service provider for plaintiff Worldwide Asset Purchasing retained to perform services including but not primarily limited to collecting delinquent debt, custodian of records and execution of documents. I am authorized to make this verification as attorney-in-fact for plaintiff under powers of attorney from plaintiff to Gerald E. Moore & Associates, P.C. and to me. The foregoing averments of fact in the within pleading are true and correct to the best of my information and belief. I understand that the statements made herein are subject to the penalties of 18 Pa. C.S. Section 4904, relating to unsworn falsification to the authorities.

Date: 3-4-08

Mark Campbell  
Signature

100534  
735

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103903  
NO: 08-479-CD  
SERVICE # 1 OF 1  
COMPLAINT

PLAINTIFF: WORLDWIDE ASSET PURCHASING, II, LLC  
vs.  
DEFENDANT: RICHARD L. KERSTETTER II

**SHERIFF RETURN**

NOW, April 08, 2008 AT 9:55 AM SERVED THE WITHIN COMPLAINT ON RICHARD L. KERSTETTER DEFENDANT AT SHERIFF'S OFFICE, 1 N. 2ND ST., SUITE 116, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO RICHARD L. KERSTETTER, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: SNYDER /

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	NEIL	039077	10.00
SHERIFF HAWKINS	NEIL	039077	57.38

**FILED**  
0/2/2008  
JUL 07 2008  
WM

William A. Shaw  
Prothonotary/Clerk of Courts

Sworn to Before Me This

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

So Answers,

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

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

WORLDWIDE ASSET PURCHASING, II , LLC  
9911 Covington Cross Dr.  
Las Vegas NV 89144

Plaintiff(s)

v.

RICHARD KERSTETTER II  
713 W Weber Avenue  
Du Bois PA 15801

Defendant(s)

CIVIL DIVISION, ARBITRATION  
AND STATUTORY APPEALS ONLY

CASE NO. 08-479-CD

TYPE OF PLEADING: \_\_\_\_\_

Praecipe for Default Judgment

CODE AND CLASSIFICATION:

FILED ON BEHALF OF: Plaintiff  
WORLDWIDE ASSET PURCHASING, II , LLC  
(Name of Party, indicate plaintiff or defendant)

NAME, ADDRESS AND TELEPHONE OF:

X Counsel of Record  
\_\_\_\_ Individual, if pro se

Derek C. Blasker, Esquire  
Burton Neil & Associates, P.C.  
1060 Andrew Drive, Suite 170  
West Chester, PA 19380  
Telephone: 610-696-2120  
email: [litigation@burt-law.com](mailto:litigation@burt-law.com)

Attorney's State ID# 202150

Attorney's Firm ID# \_\_\_\_\_

  
(Signature)

FILED Atty pd. \$20.00  
M 11/2 1001 ICCS  
AUG 01 2008 Notice to Def.

William A. Shaw

Prothonotary/Clerk of Courts

Statement to Atty

WORLDWIDE ASSET PURCHASING, II, LLC: IN THE COURT OF COMMON PLEAS  
9911 Covington Cross Dr., Las Vegas NV

Plaintiff : CLEARFIELD COUNTY, PENNSYLVANIA

v.

RICHARD KERSTETTER II : NO. 08-479-CD

713 W Weber Avenue

Du Bois PA 15801

Defendant

: CIVIL ACTION - LAW

**Praeclipe for Default Judgment**

To the Prothonotary:

Please enter judgment by default for want of an answer in the above case in favor of the plaintiff and against the defendant, and assess damages as follows:

Principal:	\$20,537.51
TOTAL	\$20,537.51

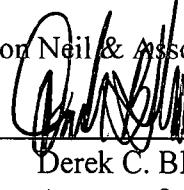
Understanding that false statements herein made are subject to penalty under 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities, I verify that:

1. The above are the precise last-known addresses of the judgment debtor and creditor.
2. The annexed notice of intention to file this praecipe was mailed to all parties against whom judgment is to be entered and to their record attorneys, if any, after the default occurred, and at least ten days prior to the date of the filing of this praecipe.
3. Pursuant to Section 201(b)(1)(A) of the Servicemembers Civil Relief Act of 2003 (SCRA), the defendant is not in the military service of the United States based on information received from the defendant and/or the Department of Defense website.

**JUDGMENT BY DEFAULT ENTERED  
AND DAMAGES ASSESSED AS ABOVE.  
NOTICE GIVEN UNDER P.A.R.CIV.P. 236**

Willie L. Shar 8/1/08  
Pro Prothonotary

Burton Neil & Associates, P.C.

By: 

Derek C. Blasker, Esquire  
Attorney for Plaintiff  
I.D. NO. 202150  
1060 Andrew Drive, Suite 170  
West Chester, PA 19380

The law firm of Burton Neil & Associates is a debt collector.

100534

WORLDWIDE ASSET PURCHASING, II LLC

100534

Plaintiff

: IN THE COURT OF COMMON PLEAS

v.

RICHARD L KERSTETTER II

Defendant

: CLEARFIELD COUNTY, PENNSYLVANIA

: NO. 08-479-CD

: CIVIL ACTION - LAW

**Notice of Intention to File Praeclipe for Default Judgment**

TO: Richard L Kerstetter II  
713 W Weber Avenue  
Du Bois PA 15801

**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 (10) 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 notice to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the following office to find out where you can get legal help. 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.

LAWYER REFERENCE AND  
INFORMATION SERVICE  
David S. Meholic  
Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
Telephone No. 814-765-2641 Ext. 5982

DATE OF NOTICE: July 15, 2008

Burton Neil & Associates, P.C.

By: \_\_\_\_\_

Derek C. Blasker, Esquire  
Attorney for Plaintiff  
Identification No. 202150  
1060 Andrew Drive, Suite 170  
West Chester, PA 19380  
(610) 696-2120

In making this communication, we advise our office is a debt collector.

Burton Neil & Associates, P.C.  
By: Derek C. Blasker, Esquire ID. NO. 202150  
1060 Andrew Drive, Suite 170  
West Chester, PA 19380  
610-696-2120

Attorney for Plaintiff

WORLDWIDE ASSET PURCHASING, II, LLC

COPY

: IN THE COURT OF COMMON PLEAS

Plaintiff

: CLEARFIELD COUNTY, PENNSYLVANIA

v.

RICHARD KERSTETTER II

Defendant

: NO. 08-479-CD

: CIVIL ACTION - LAW

**Rule of Civil Procedure NO. 236 (Revised)**

Notice is given that a JUDGMENT in the above captioned matter has been entered  
against you on August 1, 2008.

Prothonotary

By: Derek C. Blasker

Deputy

If you have any questions concerning the above, please contact:

Derek C. Blasker, Esquire  
Attorney for Party Filing  
1060 Andrew Drive, Suite 170  
West Chester, PA 19380  
Phone: 610-696-2120

The law firm of Burton Neil & Associates is a debt collector.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY ,  
PENNSYLVANIA  
STATEMENT OF JUDGMENT

Copy

Worldwide Asset Purchasing, LLC  
Plaintiff(s)

No.: 2008-00479-CD

Real Debt: \$20,537.51

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Richard L. Kerstetter II  
Defendant(s)

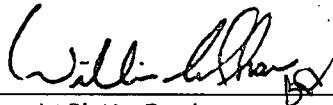
Entry: \$20.00

Instrument: Default Judgment

Date of Entry: August 1, 2008

Expires: August 1, 2013

Certified from the record this 1st day of August, 2008.

  
\_\_\_\_\_  
William A. Shaw, Prothonotary

\*\*\*\*\*

SIGN BELOW FOR SATISFACTION

Received on \_\_\_\_\_, \_\_\_\_\_, of defendant full satisfaction of this Judgment,  
Debt, Interest and Costs and Prothonotary is authorized to enter Satisfaction on the same.

\_\_\_\_\_  
Plaintiff/Attorney