

08-511-CD
Capital One vs Jessica Anderson

135237

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

CAPITAL ONE Bank
(Plaintiff)

c/o 2417 Welsh Road Suite 21 #520

(Street Address)

Phila., PA 19114

(City, State ZIP)

CIVIL ACTION

No. 08-511-CD

Type of Case: CIVIL

Type of Pleading: COMPLAINT

VS.

Filed on Behalf of:

Jessica M Anderson
(Defendant)

CAPITAL ONE Bank
(Plaintiff/Defendant)

14852 Bennetts Valley Hwy
(Street Address)

Pennfield PA 15849
(City, State ZIP)

David J. Apcthaker, Esquire

(Filed by)

2417 Welsh Road Suite 21 #520

(Address) Phila., PA 19114

215-634-8920

(Phone)

FILED

MAR 20 2008

William A. Shaw
Prothonotary/Clerk of Courts

Atty. Fee \$5.00

100 Atty

100 Sheriff

(Signature)

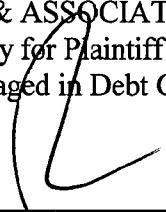
CLEARFIELD COUNTY BAR ASSOCIATION
Lawyer Referral and Information Service
814-765-2641

1. Plaintiff, CAPITAL ONE BANK, 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 JESSICA M ANDERSON, an adult individual residing at 14852 BENNETTS VALLEY HWY PENFIELD, PA 15849-2928.
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 \$1,274.71.

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

WHEREFORE, Plaintiff demands judgment in favor of Plaintiff and against Defendant(s) for the sum of \$1,274.71 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: 2/29/2008

Our File No.: 135237

VERIFICATION

Pauly Kelly, hereby states that I am Agent 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.

Pauly Kelly

DATE:

CAPITAL ONE BANK
c/o Apothaker & Associates, P.C.
2417 Welsh Road, Suite 21 #520
Philadelphia, PA 19114

JESSICA M ANDERSON
14852 BENNETTS VALLEY HWY
PENFIELD, PA 15849-2928

STATEMENT OF ACCOUNT

Debtor's Name: JESSICA M ANDERSON

Account Number: 4940652283259961

Balance Due: \$1,274.71

Our File No.: 135237

EXHIBIT "A"

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103926
NO: 08-511-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: CAPITAL ONE BANK
vs.
DEFENDANT: JESSICA M. ANDERSON

SHERIFF RETURN

NOW, April 01, 2008 AT 9:38 AM SERVED THE WITHIN COMPLAINT ON JESSICA M. ANDERSON DEFENDANT AT SHERIFF'S OFFICE, 1 N. 2ND ST., SUITE 116, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO CARL ANDERSON, HUSBAND A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: SNYDER /

FILED
9/3:09 AM
JUL 11 2008
William A. Shaw
Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	APOTHAKE	79466	10.00
SHERIFF HAWKINS	APOTHAKE	79466	35.16

Sworn to Before Me This

_____ Day of _____ 2008

So Answers,

Chester A. Hawkins
by Marilyn Hamer
Chester A. Hawkins
Sheriff

Our File No.: 135237
APOTHAKE & ASSOCIATES, P.C.
BY: Kimberly F. Scian, Esquire
Attorney I.D.# 55140
520 Fellowship Road C306
Mount Laurel, NJ 08054
(800) 672-0215
Attorney for Plaintiff

FILED

FEB 19 2009
m/4:00/✓
William A. Shaw
Prothonotary/Clerk of Courts

CAPITAL ONE BANK) COURT OF COMMON PLEAS
) CLEARFIELD COUNTY
Plaintiff,)
vs.)
)
JESSICA M ANDERSON) NO. 08-511-CD
)
)
Defendant.)
)

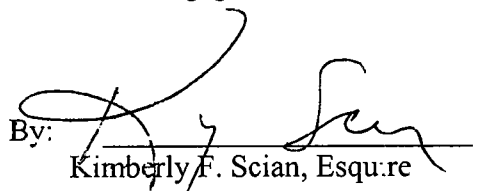
2 Cmt to
ATT

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: 
Kimberly F. Scian, Esquire

Dated: February 13, 2009