

48-880-CD
LVNV Funding vs Dennis K. Parada

164574

**COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA**

LVNV FUNDING LLC

(Plaintiff)

c/o Apothaker & Associates, P.C.

2417 Welsh Road, Suite 21 #520

(Street Address)

Philadelphia, PA 19114

(City, State, ZIP)

CIVIL ACTION

No. 08-880-CD

Type of Case: CIVIL

Type of Pleading: PLEADING

VS.

Filed on Behalf of:

DENNIS K PARADA

(Defendant)

109 HIGH ST

(Street Address)

CLEARFIELD, PA 16830-2371

(City, State, ZIP)

LVNV FUNDING

LLC

(Plaintiff)

David J. Apothaker, Esq.

Apothaker & Associates, P.C.

(Filed by)

2417 Welsh Road, Suite 21 #520

Philadelphia, PA 19114

(Address)

215 634-8920

(Phone)

FILED *Att'y pd. \$95.00*
m 12:57 PM
MAY 12 2008 *ICC Att'y*
(S) ICC Sheriff

William A. Shaw
Prothonotary/Clerk of Courts

(Signature)

Our File No.: 164574
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.

DENNIS K PARADA
109 HIGH ST
CLEARFIELD, PA 16830-2371
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 v 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

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

DENNIS K PARADA
109 HIGH ST
CLEARFIELD, PA 16830-2371
Defendant.

) NO.:

7. In addition, Plaintiff avers that Defendant has failed and continues to fail to make any payments, leaving a balance due and owing of \$1,804.23.

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

9. The original creditor is NEXTCARD INC..

WHEREFORE, Plaintiff demands judgment in favor of Plaintiff and against Defendant(s) for the sum of \$1,804.23 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: 4/24/2008

Our File No.: 164574

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: 4/24/2008

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

DENNIS K PARADA
109 HIGH ST
CLEARFIELD, PA 16830-2371

STATEMENT OF ACCOUNT

Debtor's Name:	DENNIS K PARADA
Account Number:	4254970001797630
Original Creditor:	NEXTCARD INC.
Balance Due:	\$1,804.23

Our File No.: 164574

EXHIBIT "A"

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-880-CD

LVNV FUNDING LLC

vs

DENNIS PARADA

SERVICE # 1 OF 1

COMPLAINT

SERVE BY: 06/11/2008

HEARING:

PAGE: 104164

DEFENDANT: DENNIS K. PARADA
ADDRESS: 109 HIGH ST.
CLEARFIELD, PA 16830

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

OCCUPIED

ATTEMPTS

5-19-08 11/11 NOTED

FILED

MAY 19 2008

071245

William A. Shaw
Prothonotary/Clerk of Courts

SHERIFF'S RETURN

NOW, 5/09/08 AT 135 AM (PM) SERVED THE WITHIN

COMPLAINT ON DENNIS K. PARADA, DEFENDANT

BY HANDING TO

Dennis Parada

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

ADDRESS SERVED

109 High st. Cld.

NOW _____ AT _____ AM / PM POSTED THE WITHIN

COMPLAINT FOR DENNIS K. PARADA

AT (ADDRESS) _____

NOW _____ AT _____ AM / PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF **NOT FOUND** AS TO DENNIS K. PARADA

REASON UNABLE TO LOCATE _____

SWORN TO BEFORE ME THIS

_____ DAY OF _____ 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

Deputy S. Hunter

Deputy Signature

S. Hunter

Print Deputy Name

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

LVNV Funding LLC

(Plaintiff)

CIVIL ACTION

2417 Welsh Rd

(Street Address)

No. 08-880-CD

Philadelphia PA 19114

(City, State ZIP)

Type of Case: Civil

Type of Pleading: Pleading

VS.

Dennis K Parada

(Defendant)

Filed on Behalf of:

LVNV Funding

(Plaintiff/Defendant)

109 High ST

(Street Address)

Clearfield PA 16830

(City, State ZIP)

FILED *icc def*
01 11:50am
JUN 04 2008

William A. Shaw
Prothonotary/Clerk of Courts

Dennis K Parada

~~David J. Apthaker~~
(Filed by)

109 High ST

(Address)

814-768-9544

(Phone)

Dennis K Parada

(Signature)

LVNV FUNDING LLC

June 4,08

(plaintiff)

VS.

Dennis K Parada

(Defendant)

Civil Action
No. 08-880-CD
Type of case; CIVIL
Type of Pleading ; Pleading

I wish to defend my self in the civil case above. This credit card company has added extra charges, intrest, late fees and most of this ballance is not what I owe. I had money problems and sent just what I could afford but they just kept calling me many times a day for years . The amount just kept getting bigger and so did the calls so I just quit paying . I think this card has a limit of \$400. and now it is over \$1800. and they ask for more. These people make a lot of money from this type of collection.

I don't know if I have a chance to win this case but YES I want my day in court.

Thank You
Dennis K Parada
109 High St
Clearfield Pa, 16830
phone 768-9544



(Signature)

01 21340- 1

100-105771

100 347 200 000

2019

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 08-01-2001 BY 60322 UCBAW/STP

1. The first step in the process of identifying a problem is to define the problem. This involves identifying the symptoms of the problem and determining the scope of the problem. Once the problem has been defined, the next step is to identify the causes of the problem. This involves identifying the factors that are contributing to the problem and determining the underlying causes of the problem. Once the causes of the problem have been identified, the next step is to develop a plan of action. This involves identifying the steps that need to be taken to solve the problem and determining the resources that will be needed to implement the plan. Once a plan of action has been developed, the next step is to implement the plan. This involves carrying out the steps that have been identified in the plan and monitoring the progress of the implementation. Finally, the last step in the process is to evaluate the results of the implementation. This involves determining whether the problem has been solved and whether the resources have been used effectively.

7000 mg/kg in trout and 1000 mg/kg in rainbow trout.

... 2 4000?

47. 12. 1941 19

Journal of Management Education

[illegible]

4-27-68 0150

FILED

JUN 04 2008

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104164
NO: 08-880-CD
SERVICES 1
COMPLAINT

PLAINTIFF: LVNV FUNDING LLC
vs.
DEFENDANT: DENNIS K. PARADA

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	APOTHAKE	88084	10.00
SHERIFF HAWKINS	APOTHAKE	88084	20.00

FILED
013:45:01
AUG 21 2008 (610)
William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

_____ Day of _____ 2008

So Answers,



Chester A. Hawkins
Sheriff

Our File No.: 164574
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

FILED
SEP 23 2011
11:10
William A. Shaw
Prothonotary/Clerk of Court
1 SENT TO
ATT

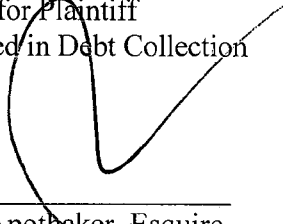
LVNV FUNDING LLC)	COURT OF COMMON PLEAS
)	CLEARFIELD COUNTY
Plaintiff,)	
vs.)	
)	
DENNIS K PARADA)	NO. 08-880-CD
)	
Defendant.)	
)	

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: 9/15/2011



* Q 1 6 4 5 7 4 D I S N 1 - *

William A. Shaw
Prothonotary/Clerk of Courts

SEP 23 2011

FILED