

08-380-CD  
LVNW Funding vs Dennis K. Parada

**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)

(Signature)

**FILED** Atty pd. \$95.00

*m10:57AM*  
**MAY 12 2008**

ICC Atty  
ICC Sheriff

William A. Shaw  
Prothonotary/Clerk of Courts

Our File No.: 164574  
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. )  
DENNIS K PARADA )  
109 HIGH ST )  
CLEARFIELD, PA 16830-2371 )  
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 demandante 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 SUFFICIENTE 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

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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.:

)

)

)

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**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 DENNIS K PARADA, an adult individual residing at 109 HIGH ST CLEARFIELD, PA 16830-2371.

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 \$1,804.23.

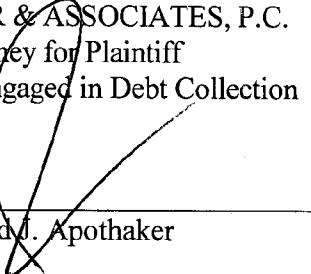
8. Although demand has been made, Defendant has failed to make payment of the amount due as above.

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.

APOTHAKER & 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

FILED

MAY 19 2008

07/12/451 wms

William A. Shaw  
Prothonotary/Clerk of Courts

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 11/21 Not

**SHERIFF'S RETURN**

NOW, 5/19/08 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. Ckfd.

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-C0

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 deft  
07/11/2008  
JUN 04 2008

William A. Shaw  
Prothonotary/Clerk of Courts

DENNIS K PARADA

DAVID J. A potheker  
(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, interest, 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)

CC: [redacted]

ON INFORMATION

([redacted])

A

100-517-00-01

100-517-00-01

CLERK  
100-517-00-01  
44-0-00000000  
100-517-00-01

RECORDED IN THE OFFICE OF THE CLERK, 100-517-00-01, ON THIS DAY, JUNE 4, 2008, AT 10:00 A.M. (CET). THE DOCUMENT IS A COPY OF A COURT ORDER ISSUED BY THE HONORABLE JUDGE [redacted] ON THIS DATE. THE ORDER IS AS FOLLOWS: [redacted] (REDACTED)

RECORDED IN THE OFFICE OF THE CLERK, 100-517-00-01, ON THIS DAY, JUNE 4, 2008, AT 10:00 A.M. (CET). THE DOCUMENT IS A COPY OF A COURT ORDER ISSUED BY THE HONORABLE JUDGE [redacted] ON THIS DATE. THE ORDER IS AS FOLLOWS: [redacted]

RECORDED  
100-517-00-01  
100-517-00-01  
100-517-00-01  
100-517-00-01  
100-517-00-01

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	APOTHAKER	88084	10.00
SHERIFF HAWKINS	APOTHAKER	88084	20.00

FILED  
013:45 AM  
AUG 21 2008  
610

William A. Shaw  
Prothonotary/Clerk of Courts

Sworn to Before Me This

So Answers,

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



Chester A. Hawkins  
Sheriff

Our File No.: 164574  
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

②  
S FILED  
Z SEP 23 2011  
M 11-106  
William A. Shaw  
Prothonotary/Clerk of Court  
I Went to  
Attn

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

**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: 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**