

08-915-CD
LVNV Funding vs Christopher Freyer

**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. 2008-915-CD

Type of Case: CIVIL

Type of Pleading: PLEADING

VS.

Filed on Behalf of:

CHRISTOPHER J FREYER

(Defendant)

109 MERRILL ST

(Street Address)

CLEARFIELD PA 16830-1403

(City, State, ZIP)

LVNV FUNDING

LLC

(Plaintiff)

FILED *pd \$95.00 Atty*
m/11:40 am ICC Atty
MAY 16 2008 *ICC Shiff*
(LM)

William A. Shaw
Prothonotary/Clerk of Courts

David J. Apothaker, Esq.

Apothaker & Associates, P.C.

(Filed by)

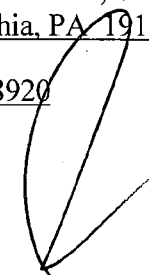
2417 Welsh Road, Suite 21 #520

Philadelphia, PA 19114

(Address)

215 634-8920

(Phone)



(Signature)

Attorneys for Plaintiff

Defendant.

) NO.:

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.

CHRISTOPHER J FREYER

109 MERRILL ST

CLEARFIELD, PA 16830-1403

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 CHRISTOPHER J FREYER, an adult individual residing at 109 MERRILL ST CLEARFIELD, PA 16830-1403.

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".

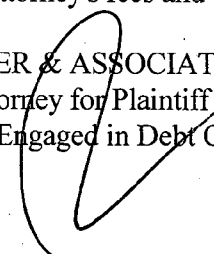
7. In addition, Plaintiff avers that Defendant has failed and continues to fail to make any payments, leaving a balance due and owing of \$2,938.06.

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 \$2,938.06 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

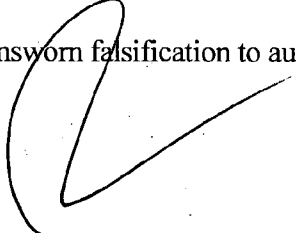
BY: 
David J. Apothaker

Dated: 4/25/2008

Our File No.: 155771

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: 4/25/2008

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

CHRISTOPHER J FREYER
109 MERRILL ST
CLEARFIELD, PA 16830-1403

STATEMENT OF ACCOUNT

Debtor's Name:	CHRISTOPHER J FREYER
Account Number:	1150143353706
Original Creditor:	SEARS
Balance Due:	\$2,938.06

Our File No.: 155771

EXHIBIT "A"

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-915-CD

LVNV FUNDING LLC

vs

CHRISTOPHER J. FREYER

COMPLAINT

SERVICE # 1 OF 1

SERVE BY: 06/15/2008

HEARING:

PAGE: 104184

DEFENDANT: CHRISTOPHER J. FREYER

ADDRESS: 109 MERRILL ST.
CLEARFIELD, PA 16830

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

OCCUPIED

ATTEMPTS

SHERIFF'S RETURN

NOW, 30th May 2008 AT 10:00 AM / PM SERVED THE WITHIN

COMPLAINT ON CHRISTOPHER J. FREYER, DEFENDANT

BY HANDING TO

Stephnie Jacoby

Girl Friend

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

ADDRESS SERVED

109 Merrill St CLFD

NOW _____ AT _____ AM / PM POSTED THE WITHIN

COMPLAINT FOR CHRISTOPHER J. FREYER

AT (ADDRESS) _____

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

I MAKE RETURN OF **NOT FOUND** AS TO CHRISTOPHER J. FREYER

REASON UNABLE TO LOCATE _____

SWORN TO BEFORE ME THIS

_____ DAY OF _____ 2008

So Answers CHESTER A. HAWKINS, SHERIFF

BY

George F. DeHaven
Deputy Signature
George F. DeHaven
Print Deputy Name

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104184
NO: 08-915-CD
SERVICES 1
COMPLAINT

PLAINTIFF: LVNV FUNDING LLC
vs.
DEFENDANT: CHRISTOPHER J. FREYER

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	APOTHAKE	88200	10.00
SHERIFF HAWKINS	APOTHAKE	88200	20.00

FILED

071056
AUG 28 2008

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

_____ Day of _____ 2008

So Answers,



Chester A. Hawkins
Sheriff

Our File No.: 155771
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

FILED
M 1:58 P.M. OK
FEB 05 2009 1 CC Atty
William A. Shaw
Prothonotary/Clerk of Courts

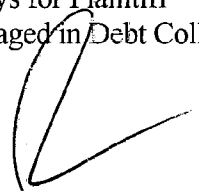
LVNV FUNDING LLC)	COURT OF COMMON PLEAS
)	CLEARFIELD COUNTY
Plaintiff,)	
vs.)	
)	
CHRISTOPHER J FREYER)	NO. 2008-915-CD
)	
Defendant.)	
)	

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: January 28, 2009