

149399

**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. 08-962-CD

Type of Case: CIVIL

Type of Pleading: PLEADING

VS.

Filed on Behalf of:

KAREN E BROCK A/K/A KAREN E

GREENDONER

(Defendant)

176 GRANDVIEW AVE

(Street Address)

CURWENSVILLE, PA 16833

(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

MAY 23 2008

William A. Shaw
Prothonotary/Clerk of Courts

Att'y pd. \$95.00

ICC Att'y

ice sheriff

~ Our File No.: 149399
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.)	
KAREN E BROCK A/K/A KAREN E)	
GREENDONER)	
176 GRANDVIEW AVE)	
CURWENSVILLE, PA 16833)	
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 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

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

c/o Apothaker & Associates, P.C.

2417 Welsh Road, Suite 21 #520

Philadelphia, PA 19114

Plaintiff,

vs.

KAREN E BROCK A/K/A KAREN E

GREENDONER

176 GRANDVIEW AVE

CURWENSVILLE, PA 16833

Defendant.

) COURT OF COMMON PLEAS

) CLEARFIELD COUNTY

) NO.:

CIVIL ACTION COMPLAINT
FIRST COUNT

1. Plaintiff is LVNV FUNDING, LLC c/o Apothaker & Associates, P.C., 2417 Welsh Road, Suite 21 #520, Philadelphia, PA 19114.
2. Defendant(s) is/are KAREN E BROCK A/K/A KAREN E GREENDONER, an adult individual residing at 176 GRANDVIEW AVE CURWENSVILLE, PA 16833.
3. Plaintiff, LVNV FUNDING, LLC, is the Assignee and Successor in Interest of Account #6008890813418480; and said account was issued to Defendant(s) by GE CAPITAL/JC PENNEY, the Original creditor.
4. Defendant received, accepted and used the account to its benefit.
5. This account is in default and Defendant(s) has an unpaid balance of \$2,787.67. A true and correct copy of the total due and owing is attached hereto, made a part hereof and marked as Exhibit "A".
6. All credits, if any, to which Defendant(s) is entitled, have been applied to the account and are included in Exhibit "A".
7. Although demand has been made, Defendant(s) 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 \$2,787.67 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: 5/13/2008

Our File No.: 149399

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: 5/13/2008

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

KAREN E BROCK A/K/A KAREN E GREENDONER
176 GRANDVIEW AVE
CURWENSVILLE, PA 16833

STATEMENT OF ACCOUNT

Debtor's Name: KAREN E BROCK A/K/A KAREN E GREENDONER
Account Number: 6008890813418480
Original Creditor: GE CAPITAL/JC PENNEY
Balance Due: \$2,787.67

Our File No.: 149399

EXHIBIT "A"

FILED

MAY 23 2008

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
NO: 08-962-CD

LVNV FUNDING LLC
vs
KAREN E. BROCK aka KAREN E. GREENDONER
COMPLAINT

SERVICE # 1 OF 1

SERVE BY: 06/22/2008 HEARING: PAGE: 104209

DEFENDANT: KAREN E. BROCK aka KAREN E. GREENDONER
ADDRESS: 176 GRANDVIEW AVE.
CURWENSVILLE, PA 16833
ALTERNATE ADDRESS

FILED
06/23/08
JUN 02 2008
William A. Shaw
Prothonotary/Clerk of Courts

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT OCCUPIED

ATTEMPTS _____

SHERIFF'S RETURN

NOW, 6-2-08 AT 11:33 AM PM SERVED THE WITHIN

COMPLAINT ON KAREN E. BROCK aka KAREN E. GREENDONER, DEFENDANT

BY HANDING TO Karen E. Greendonner, Def.

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

ADDRESS SERVED 176 Grandview Ave.
Curwensville, Pa. 16833

NOW _____ AT _____ AM / PM POSTED THE WITHIN

COMPLAINT FOR KAREN E. BROCK aka KAREN E. GREENDONER

AT (ADDRESS) _____

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

I MAKE RETURN OF **NOT FOUND** AS TO KAREN E. BROCK aka KAREN E. GREENDONER

REASON UNABLE TO LOCATE _____

SWORN TO BEFORE ME THIS
_____ DAY OF _____ 2008

So Answers: CHESTER A. HAWKINS, SHERIFF
BY: James E. Davis
Deputy Signature
JAMES E. DAVIS
Print Deputy Name

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104209
NO: 08-962-CD
SERVICES 1
COMPLAINT

PLAINTIFF: LVNV FUNDING LLC
vs.
DEFENDANT: KAREN E. BROCK aka KAREN E. GREENDONER

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	APOTHAKE	90325	10.00
SHERIFF HAWKINS	APOTHAKE	90325	24.06

FILED

013:15 cm
SEP 22 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.: 149399
APOTHAKER & ASSOCIATES, P.C.
BY: David J. Apothaker
Attorney I.D.# 38423
520 Fellowship Road C306
Mount Laurel, NJ 08054
(800) 672-0215
Attorney for Plaintiff

FILED
M 11:47 a.m. GK
FEB 20 2009
William A. Shaw
Prothonotary/Clerk of Courts
Atty paid 20.00
1 cc + Statement Atty
1 cc + Notice Def

LVNV FUNDING, LLC

Plaintiff,

vs:

KAREN E BROCK A/K/A KAREN E
GREENDONER

Defendant.

) COURT OF COMMON PLEAS OF
) CLEARFIELD COUNTY

) NO.: 08-962-CD

) Civil Action
)
)
)

PRAECIPE TO ENTER DEFAULT JUDGMENT

TO THE PROTHONOTARY:

Please enter a default judgment in favor of plaintiff, LVNV FUNDING, LLC, and against Defendant, KAREN E BROCK A/K/A KAREN E GREENDONER, for failure to answer or otherwise respond to the Complaint - Civil Action.

The Complaint was served upon the defendants on June 02, 2008 by the CLEARFIELD Sheriff's Department. Copies of the proofs of service are attached hereto as Exhibit "A"

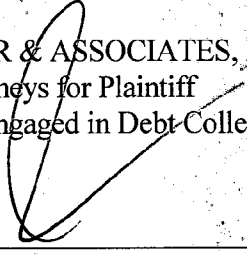
I certify, a copy of the Notice of Intention To Take Default was mailed on October 23, 2008, and also attached hereto.

Assess damages in the amount of:

(a)	Balance:	\$2,787.67
(b)	Interest from May 13, 2008	\$122.05
(c)	Costs	\$129.06
TOTAL		\$3,038.78

APOTHAKER & ASSOCIATES, P.C.
Attorneys for Plaintiff
A Law Firm Engaged in Debt Collection

By:


David J. Apothaker

Dated: 2/10/2009

**OFFICE OF THE PROTHONOTARY
COURT OF COMMON PLEAS**

TO: KAREN E BROCK A/K/A KAREN E GREENDONER
176 GRANDVIEW AVE
CURWENSVILLE, PA 16833

LVNV FUNDING, LLC)	COURT OF COMMON PLEAS OF
)	CLEARFIELD COUNTY
Plaintiff,)	
vs.)	
)	NO.: 08-962-CD
KAREN E BROCK A/K/A KAREN E)	
GREENDONER)	Civil Action
)	
Defendant.		

NOTICE

Pursuant to Rule 236 of the Supreme Court of Pennsylvania, you are hereby notified that a Judgment has been entered against you in the above proceeding as indicated below.

XX JUDGMENT BY DEFAULT

 JUDGMENT IN REPLEVIN

 JUDGMENT BY CONFESSION

 JUDGMENT FOR POSSESSION

 JUDGMENT ON AWARD OF
ARBITRATORS

 JUDGMENT ON VERDICT

 JUDGMENT ON COURT FINDINGS

 JUDGMENT ON WRIT OF REVIVAL

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE, PLEASE CALL:

ATTORNEY David J. Apothaker, Esq. at this telephone number: 215-634-8920

Our File No.: 149399
APOTHAKER & ASSOCIATES, P.C.
BY: David J. Apothaker
Attorney I.D.# 38423
520 Fellowship Road C306
Mount Laurel, NJ 08054
(800) 672-0215
Attorney for Plaintiff

LVNV FUNDING, LLC)	COURT OF COMMON PLEAS OF
)	CLEARFIELD COUNTY
Plaintiff,)	
vs.)	
)	NO.: 08-962-CD
KAREN E BROCK A/K/A KAREN E)	
GREENDONER)	Civil Action
)	
Defendant.)	

AFFIDAVIT OF NON-MILITARY SERVICE

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

SS.

David J. Apothaker, being duly sworn according to law, deposes and says that I am the attorney for Plaintiff, and authorized to make this affidavit; that Defendant(s) resides at 176 GRANDVIEW AVE CURWENSVILLE, PA 16833.

We inquired with the web site of the Defense Manpower Data Center, located at 1600 Wilson Boulevard, Suite 400, Arlington, VA 22209-2593, if the Defendant(s) is/are in any branch of the military.

Mary M. Snavelly-Dixon, Director of the Defense Manpower Data Center has sent back our inquiry indicated that the Defendant(s) is/are not in the military.

David J. Apothaker
Attorney for Plaintiff

The above signed understands that the statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

Department of Defense Manpower Data Center

FEB-10-2009 10:07:03



Military Status Report
Pursuant to the Servicemembers Civil Relief Act

◀ Last Name	First/Middle	Begin Date	Active Duty Status	Service/Agency
BROCK	KAREN E	Based on the information you have furnished, the DMDC does not possess any information indicating that the individual is currently on active duty.		

Upon searching the information data banks of the Department of Defense Manpower Data Center, based on the information that you provided, the above is the current status of the individual as to all branches of the Military.

Mary M. Snavelly-Dixon

Mary M. Snavelly-Dixon, Director
Department of Defense - Manpower Data Center
1600 Wilson Blvd., Suite 400
Arlington, VA 22209-2593

The Defense Manpower Data Center (DMDC) is an organization of the Department of Defense that maintains the Defense Enrollment and Eligibility Reporting System (DEERS) database which is the official source of data on eligibility for military medical care and other eligibility systems.

The Department of Defense strongly supports the enforcement of the Servicemembers Civil Relief Act [50 USCS Appx. §§ 501 et seq] (SCRA) (formerly the Soldiers' and Sailors' Civil Relief Act of 1940). DMDC has issued hundreds of thousands of "does not possess any information indicating that the individual is currently on active duty" responses, and has experienced a small error rate. In the event the individual referenced above, or any family member, friend, or representative asserts in any manner that the individual is on active duty, or is otherwise entitled to the protections of the SCRA, you are strongly encouraged to obtain further verification of the person's active duty status by contacting that person's Military Service via the "defenselink.mil" URL provided below. If you have evidence the person is on active-duty and you fail to obtain this additional Military Service verification, provisions of the SCRA may be invoked against you.

If you obtain further information about the person (e.g., an SSN, improved accuracy of DOB, a middle name), you can submit your request again at this Web site and we will provide a new certificate for that query.

This response reflects current active duty status only. For historical information, please contact the Military Service SCRA points-of-contact.

See: <http://www.defenselink.mil/faq/pis/PC09SLDR.html>

WARNING: This certificate was provided based on a name and Social Security number (SSN) provided

OFFICE OF THE PROTHONOTARY
COURT OF COMMON PLEAS
CLEARFIELD COUNTY

LVNV FUNDING, LLC

vs.

KAREN E BROCK A/K/A KAREN E
GREENDONER) COURT OF COMMON PLEAS
) CLEARFIELD COUNTY

)

)

) NO. 08-962-CD

)

To: KAREN E BROCK A/K/A KAREN E GREENDONER
176 GRANDVIEW AVE
CURWENSVILLE, PA 16833

NOTICE, RULE 237.5**NOTICE OF PRAECIPE TO ENTER JUDGMENT BY DEFAULT**Date of Notice: October 23, 2008**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 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 PAPER TO YOUR LAWYER AT ONCE, IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. 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.

COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
SECOND & MARKET STREETS
CLEARFIELD, PA 16830
814-765-2641

/s/ David J. Apothaker
DAVID J. APOTHAKE, ESQUIRE
APOTHAKE & ASSOCIATES, PC
A Law Firm Engaged in Debt Collection
520 Fellowship Road C306
Mount Laurel, NJ 08054
(800) 672-0215
Attorney for Plaintiff
Attorney ID #38423

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
NO: 08-962-CD

LVNV FUNDING LLC
vs
KAREN E. BROCK aka KAREN E. GREENDONER
COMPLAINT

SERVICE # 1 OF 1

SERVE BY: 06/22/2008 HEARING: PAGE: 104209

DEFENDANT: KAREN E. BROCK aka KAREN E. GREENDONER
ADDRESS: 176 GRANDVIEW AVE.
CURWENSVILLE, PA 16833
ALTERNATE ADDRESS

COPY

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT OCCUPIED

ATTEMPTS _____

SHERIFF'S RETURN

NOW, 6-2-08 AT 11:33 (AM) PM SERVED THE WITHIN

COMPLAINT ON KAREN E. BROCK aka KAREN E. GREENDONER, DEFENDANT

BY HANDING TO Karen E. Greendonner Def.

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

ADDRESS SERVED 176 Grandview Ave.
Curwensville, Pa. 16833

NOW _____ AT _____ AM / PM POSTED THE WITHIN

COMPLAINT FOR KAREN E. BROCK aka KAREN E. GREENDONER

AT (ADDRESS) _____

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

I MAKE RETURN OF **NOT FOUND** AS TO KAREN E. BROCK aka KAREN E. GREENDONER

REASON UNABLE TO LOCATE _____

SWORN TO BEFORE ME THIS

_____ DAY OF _____ 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

James E. Davis
Deputy Signature

JAMES E. DAVIS
Print Deputy Name

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

LVNV Funding, LLC
Plaintiff(s)

No.: 2008-00962-CD

Real Debt: \$3,038.78

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Karen E. Brock
Defendant(s)

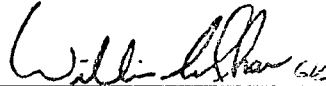
Entry: \$20.00

Instrument: Default Judgment

Date of Entry: February 20, 2009

Expires: February 20, 2014

Certified from the record this 20th day of February, 2009.



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

Our File No.: 149399
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

5
FILED ICC AK
m/j:402m Apothaker
APR 27 2009
William A. Shaw
Prothonotary/Clerk of Courts

LVNV FUNDING, LLC)	COURT OF COMMON PLEAS
)	CLEARFIELD COUNTY
Plaintiff,)	
vs.)	
)	
KAREN E BROCK A/K/A KAREN E)	NO. 08-962-CD
GREENDONER)	
)	
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: April 16, 2009

Our File No.: 149399
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

JUN 25 2010

William A. Shaw
Prothonotary/Clerk of Courts

LVNV FUNDING, LLC) COURT OF COMMON PLEAS
Plaintiff,) CLEARFIELD COUNTY
vs.)
KAREN E BROCK, A/K/A KAREN E)
GREENDONER) NO. 08-962-CD
Defendant.)

PRAECIPE TO MARK JUDGMENT SATISFIED

TO THE PROTHONOTARY:

Please mark the Judgment Satisfied against the Defendant. Judgment has been paid in full.

APOTHAKER & ASSOCIATES, P.C.
Attorneys for Plaintiff
A Law Firm Engaged in Debt Collection

By: _____
David J. Apothaker, Esquire

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA-CIVIL DIVISION

LVNV FUNDING LLC,
Plaintiff

vs.

KAREN E. BROCK aka,
KAREN E. GREENDONER,
Defendant

*
*
* NO.: 08-962-CD
*
* Type of Case: Civil
*
* Type of Pleading: Petition to
* Mark Settled
*
*
* Filed on Behalf of: Karen E. Greendonner
*
* Counsel for this Party:
* Robin Jean Foor, Esquire
*
* Supreme Court No.: 41520
*
* 211 East Locust Street
* Clearfield, PA 16839
* (814)765-9646

S FILED 300
0/10:35/01 Atty Foor
AUG 05 2010
William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS CLEARFIELD COUNTY PENNSYLVANIA
CIVIL DIVISION

LVNV FUNDING, LLC, :
PLAINTIFF :
: NO: 08-962
:
KAREN E. BROCK A/K/A :
KAREN E. GREENDONER :
DEFENDANT :

PETITION TO HAVE CASE MARKED SETTLED DISCONTINUED AND ENDED
Petitioner, Karen E. Greendonner, aka Karen E. Brock, by and through her attorneys,
MidPenn Legal services and Robin Jean Foor, Esquire alleges:

1. Plaintiff, LVNV Funding, LLC, obtained a judgment against Ms. Greendonner on February 20, 2009, in the amount of \$3,038.78 (three thousand and thirty-eight dollars and seventy-eight cents).
2. In a letter dated March 9, 2009, LVNV confirmed a settlement agreement that it would accept \$1980(one thousand nine hundred and eighty dollars) to settle the case.
See Exhibit A.
3. Ms. Greendonner did pay the agreed amount.
4. LVNV's counsel filed a praecipe to mark the case dismissed without prejudice.
5. As a result, the docket still indicates an existing judgment.

6. On June 29, 2010, counsel for Ms. Greendonner contacted counsel for LVNV and requested that he file a praecipe to mark the case "settled, discontinued and ended."
7. To date, LVNV's counsel has not responded.

Wherefore, Karen Greendonner, requests the court to order that the above captions case be marked "settled, discontinued and ended" and issue a rule on LVNV to show why that relief should not be granted.



Robin Jean Foor

Attorney for Petitioner

IN THE COURT OF COMMON PLEAS CLEARFIELD COUNTY PENNSYLVANIA
CIVIL DIVISION

LVNV FUNDING, LLC,
PLAINTIFF

VS.

KAREN E. BROCK, A.K.A. KAREN E.
GREENDONER,
DEFENDANT

2008-962-CD

FILED

AUG 06 2010 (64)
0/3:58/V
William A. Shaw
Prothonotary/Clerk of Courts

3 clear to
Att

RULE TO SHOW CAUSE

ND NOW, this 6 day of August, 2010 upon consideration of the attached Petition a Rule is hereby issued on LVNV FUNDING LLC to show cause why KAREN GREENDONER'S petition should not be granted. Rule returnable the 31st day August, 2010 at 2:30 PM o'clock in Courtroom 1, Clearfield County Courthouse, Clearfield, PA for a hearing.

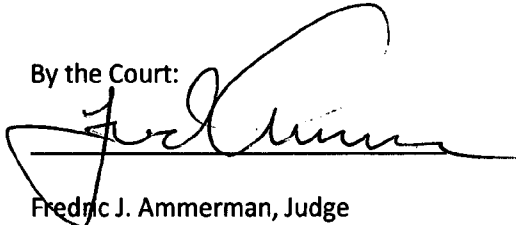
NOTICE

A PETITION OR MOTION HAS BEEN FILED AGAINST YOU IN COURT. IF YOU WISH TO DEFEND AGAINST THE CLAIMS SET FORTH IN THE FOLLOWING PETITION BY ENTERING A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILING IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE MATTER SET FORTH AGAINST YOU. YOU ARE WARNED THAT IF YOU FAIL TO DO SO THE CASE MAY PROCEED WITHOUT YOU AND AN ORDER MAY BE ENTERED AGAINST YOU BY THE COURT WITHOUT FURTHER NOTICE FOR THE RELIEF REQUESTED BY THE PETITIONER OR MOVANT. YOU MAY LOSE RIGHTS IMPORTANT TO YOU.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER AND CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE TO GET LEGAL HELP.

Court Administrator's Office
Clearfield County Couthouse
North Second Street
Clearfield, PA 16830
(814)765-

By the Court:


Fredric J. Ammerman, Judge

FILED

AUG 06 2010

William A. Shaw
Prothonotary/Clerk of Courts

DATE: _____
☒ You are responsible for serving all appropriate parties.
☐ The Prothonotary's office has provided service to the following parties:
____ Plaintiff(s) _____ Plaintiff(s) Attorney _____ Other
____ Defendant(s) _____ Defendant(s) Attorney
____ Special Instructions:

CA

IN THE COURT OF COMMON PLEAS CLEARFIELD COUNTY PENNSYLVANIA

CIVIL DIVISION

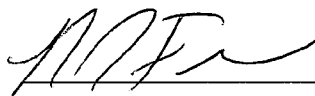
LVNV FUNDING, LLC, :
PLAINTIFF :
: NO: 08-962
:
KAREN E. BROCK A/K/A :
KAREN E. GREENDONER :
DEFENDANT :

FILED 2CC Atty
01:45 PM Foor
AUG 06 2010
William A. Shaw
Prothonotary/Clerk of Courts

PRACIPE TO WITHDRAW PETITION

To the Prothonotary:

Please withdraw the Petition to Mark Settled filed on behalf of defendant on June 5, 2010.



Robin Jean Foor

Attorney for Petitioner

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

LVNV FUNDING, LLC

Plaintiff

vs

KAREN E. BROCK, a/k/a KAREN E. GREENDONER

Defendant

NO. 08-962-CD

ORDER

NOW, this 10th day of August, 2010, upon receipt and review of the Praecept to Withdraw Petition filed on August 6, 2010 on behalf of the Defendant by Robin J. Foor, Esquire; it is the ORDER of this Court that the Rule Returnable on August 31, 2010 at 2:30 p.m. be and is hereby CANCELED.

BY THE COURT,



FREDRIC J. AMMERMAN
President Judge

FILED 1cc
4 01:55/60k Atty:
AUG 17 2010 Apothaker
Foor
William A. Shaw
Prothonotary/Clerk of Courts
(60)

FILED

AUG 17 2010

William A. Shaw
Prothonotary/Clerk of Courts

DATE: 8/17/10

☐ You are responsible for serving all appropriate parties.

☒ The Prothonotary's office has provided service to the following parties:

☐ Plaintiff(s) ☒ Plaintiff(s) Attorney ☐ Other

☐ Defendant(s) ☒ Defendant(s) Attorney

☐ Special Instructions: