

08-972-CD
Unifund CCR vs Robert A. Conklin

COMMONWEALTH OF PENNSYLVANIA

COURT OF COMMON PLEAS

JUDICIAL DISTRICT

46th

NOTICE OF APPEAL

FROM

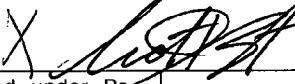
DISTRICT JUSTICE JUDGMENT

COMMON PLEAS No.

08-972-CD

NOTICE OF APPEAL

Notice is given that the appellant has filed in the above Court of Common Pleas an appeal from the judgment rendered by the District Justice on the date and in the case mentioned below.

NAME OF APPELLANT <u>Unifund CCR Partners c/o Abrahamson</u>	MAG. DIST. NO. OR NAME OF D.J. <u>46-3-02</u>
ADDRESS OF APPELLANT <u>1729 Pittston Ave</u>	CITY <u>Scranton</u>
STATE <u>PA</u>	ZIP CODE <u>18505</u>
DATE OF JUDGMENT <u>4/28/08</u>	IN THE CASE OF (Plaintiff) <u>Unifund CCR Partners</u> vs. <u>Robert A Conklin</u> (Defendant)
CLAIM NO. <u>CV 19</u>	SIGNATURE OF APPELLANT OR HIS ATTORNEY OR AGENT 
LT 19	
This block will be signed ONLY when this notation is required under Pa. R.C.P.J.P. No. 1008B. This Notice of Appeal, when received by the District Justice, will operate as a SUPERSEDEAS to the judgment for possession in this case.	
Signature of Prothonotary or Deputy	

If appellant was Claimant (see Pa. R.C.P.J.P. No. 1001(6) in action before District Justice, he MUST FILE A COMPLAINT within twenty (20) days after filing his NOTICE of APPEAL.

Signature of Prothonotary or Deputy

PRAECIPE TO ENTER RULE TO FILE COMPLAINT AND RULE TO FILE

(This section of form to be used ONLY when appellant was DEFENDANT (see Pa. R.C.P.J.P. No. 1001(7) in action before District Justice. IF NOT USED, detach from copy of notice of appeal to be served upon appellee).

PRAECIPE: To Prothonotary

Enter rule upon _____, appellee(s), to file a complaint in this appeal
Name of appellee(s)

(Common Pleas No. _____) within twenty (20) days after service of rule or suffer entry of judgment of non pros.

Signature of appellant or his attorney or agent

RULE: To _____, appellee(s)
Name of appellee(s)

(1) You are notified that a rule is hereby entered upon you to file a complaint in this appeal within twenty (20) days after the date of service of this rule upon you by personal service or by certified or registered mail.

(2) If you do not file a complaint within this time, a JUDGMENT OR NON PROS WILL BE ENTERED AGAINST YOU.

(3) The date of service of this rule if service was by mail is the date of mailing.

Date: _____, 19 _____.
Signature of Prothonotary or Deputy

FILED Atty Best pd. \$95.00
m/10/54/2008 (Billable)
MAY 27 2008 1 Copy to Atty Best
Def.
MDJ Ireland
William A. Shaw
Prothonotary/Clerk of Courts

PROOF OF SERVICE OF NOTICE OF APPEAL AND RULE TO FILE COMPLAINT

(This proof of service MUST BE FILED WITHIN TEN (10) DAYS AFTER filing the notice of appeal. Check applicable boxes)

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF _____ ; ss

AFFIDAVIT: I hereby swear or affirm that I served

a copy of the Notice of Appeal, Common Pleas No. _____, upon the District Justice designated therein on (date of service) _____, 19 ___. by personal service by (certified) (registered) mail, sender's receipt attached hereto, and upon the appellee, (name) _____ on _____, 19 _____. by personal service by (certified) (registered) mail, sender's receipt attached hereto.

and further that I served the Rule to File a Complaint accompanying the above Notice of Appeal upon the appellee(s) to whom the Rule was addressed on _____, 19 ___. by personal service by (certified) (registered) mail, sender's receipt attached hereto.

SWORN (AFFIRMED) AND SUBSCRIBED BEFORE ME

THIS _____ DAY OF _____, 19 _____. _____
Signature of affiant

Signature of official before whom affidavit was made

Title of official

My commission expires on _____, 19 _____. _____
Signature of official

SEARCHED
INDEXED
SERIALIZED
FILED
CLERK'S OFFICE

COMMONWEALTH OF PENNSYLVANIA

COURT OF COMMON PLEAS

JUDICIAL DISTRICT

46th

NOTICE OF APPEAL

FROM

DISTRICT JUSTICE JUDGMENT

COMMON PLEAS No.

08-972-CD

NOTICE OF APPEAL

Notice is given that the appellant has filed in the above Court of Common Pleas an appeal from the judgment rendered by the District Justice on the date and in the case mentioned below.

NAME OF APPELLANT	MAG. DIST. NO. OR NAME OF D.J.	
John H. Schaeffer	46-3-C-2	
ADDRESS OF APPELLANT	CITY	STATE
1734 Phillips	Philadelphia	PA
DATE OF JUDGMENT	IN THE CASE OF (Plaintiff) (Defendant)	
4/12/83	John H. Schaeffer vs. Commonwealth of Pennsylvania	
CLAIM NO.	SIGNATURE OF APPELLANT OR HIS ATTORNEY OR AGENT	
CV 19	X /s/ J.H.S.	
LT 19		

This block will be signed ONLY when this notation is required under Pa. R.C.P.J.P. No. 1008B.

This Notice of Appeal, when received by the District Justice, will operate as a SUPERSEDEAS to the judgment for possession in this case.

Signature of Prothonotary or Deputy

If appellant was Claimant (see Pa. R.C.P.J.P. No. 1001(6) in action before District Justice, he MUST FILE A COMPLAINT within twenty (20) days after filing his NOTICE of APPEAL.

PRAECIPE TO ENTER RULE TO FILE COMPLAINT AND RULE TO FILE

(This section of form to be used ONLY when appellant was DEFENDANT (see Pa. R.C.P.J.P. No. 1001(7) in action before District Justice. IF NOT USED, detach from copy of notice of appeal to be served upon appellee).

PRAECIPE: To Prothonotary

Enter rule upon _____, appellee(s), to file a complaint in this appeal
Name of appellee(s)

(Common Pleas No. _____) within twenty (20) days after service of rule or suffer entry of judgment of non pros.

Signature of appellant or his attorney or agent

RULE: To _____, appellee(s)
Name of appellee(s)

(1) You are notified that a rule is hereby entered upon you to file a complaint in this appeal within twenty (20) days after the date of service of this rule upon you by personal service or by certified or registered mail.

(2) If you do not file a complaint within this time, a JUDGMENT OR NON PROS WILL BE ENTERED AGAINST YOU.

(3) The date of service of this rule if service was by mail is the date of mailing.

Date: _____, 19 _____.
Signature of Prothonotary or Deputy

PROOF OF SERVICE OF NOTICE OF APPEAL AND RULE TO FILE COMPLAINT

(This proof of service MUST BE FILED WITHIN TEN (10) DAYS AFTER filing the notice of appeal. Check applicable boxes)

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF _____, ss

AFFIDAVIT: I hereby swear or affirm that I served

a copy of the Notice of Appeal, Common Pleas No. _____, upon the District Justice designated therein on (date of service) _____, 19 _____. by personal service by (certified) (registered) mail, sender's receipt attached hereto, and upon the appellee, (name) _____ on _____, 19 _____. by personal service by (certified) (registered) mail, sender's receipt attached hereto.

and further that I served the Rule to File a Complaint accompanying the above Notice of Appeal upon the appellee(s) to whom the Rule was addressed on _____, 19 _____. by personal service by (certified) (registered) mail, sender's receipt attached hereto.

SWORN (AFFIRMED) AND SUBSCRIBED BEFORE ME

THIS ____ DAY OF _____, 19 _____. _____

Signature of affiant

Signature of official before whom affidavit was made

Title of official

My commission expires on _____, 19 _____. _____

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: **CLEARFIELD**

Mag. Dist. No.:

46-3-02

MDJ Name: Hon.

RICHARD A. IRELAND
Address: **650 LEONARD ST**
STE 113
CLEARFIELD, PA

Telephone: **(814) 765-5335** 16830

**NOTICE OF JUDGMENT/TRANSCRIPT
CIVIL CASE**

PLAINTIFF:

NAME and ADDRESS

UNIFUND CCR PARTNERS
1729 PITTSTON AVE
SCRANTON, PA 18505

VS.

DEFENDANT:

NAME and ADDRESS

CONKLIN, ROBERT A
1439 TURNPIKE AVE
CLEARFIELD, PA 16830

C/O EDWIN ABRAHAMSEN & ASSOC., P.C.
1729 PITTSTON AVE
SCRANTON, PA 18505

Docket No.: **CV-0000026-08**
Date Filed: **1/23/08**



THIS IS TO NOTIFY YOU THAT:

FOR DEFENDANT

Judgment: _____ (Date of Judgment) **4/28/08**

<input checked="" type="checkbox"/> Judgment was entered for: (Name) CONKLIN, ROBERT A	<p><input type="checkbox"/> Defendants are jointly and severally liable.</p> <p><input type="checkbox"/> Damages will be assessed on Date & Time _____</p> <p><input type="checkbox"/> This case dismissed without prejudice.</p> <p><input type="checkbox"/> Amount of Judgment Subject to Attachment/42 Pa.C.S. § 8127 \$ _____</p> <p><input type="checkbox"/> Portion of Judgment for physical damages arising out of residential lease \$ _____</p>	Amount of Judgment \$.00
Judgment Costs \$.00		
Interest on Judgment \$.00		
Attorney Fees \$.00		
Total \$.00		
Post Judgment Credits \$ _____		
Post Judgment Costs \$ _____		
Certified Judgment Total \$ _____		

ANY PARTY HAS THE RIGHT TO APPEAL WITHIN 30 DAYS AFTER THE ENTRY OF JUDGMENT BY FILING A NOTICE OF APPEAL WITH THE PROTHONOTARY/CLERK OF THE COURT OF COMMON PLEAS, CIVIL DIVISION. YOU MUST INCLUDE A COPY OF THIS NOTICE OF JUDGMENT/TRANSCRIPT FORM WITH YOUR NOTICE OF APPEAL.

EXCEPT AS OTHERWISE PROVIDED IN THE RULES OF CIVIL PROCEDURE FOR MAGISTERIAL DISTRICT JUDGES, IF THE JUDGMENT HOLDER ELECTS TO ENTER THE JUDGMENT IN THE COURT OF COMMON PLEAS, ALL FURTHER PROCESS MUST COME FROM THE COURT OF COMMON PLEAS AND NO FURTHER PROCESS MAY BE ISSUED BY THE MAGISTERIAL DISTRICT JUDGE.

UNLESS THE JUDGMENT IS ENTERED IN THE COURT OF COMMON PLEAS, ANYONE INTERESTED IN THE JUDGMENT MAY FILE A REQUEST FOR ENTRY OF SATISFACTION WITH THE MAGISTERIAL DISTRICT JUDGE IF THE JUDGMENT DEBTOR PAYS IN FULL, SETTLES, OR OTHERWISE COMPLIES WITH THE JUDGMENT.

APR 28 2008 Date Robert Ireland, Magisterial District Judge

I certify that this is a true and correct copy of the record of the proceedings containing the judgment.

Date _____, Magisterial District Judge

My commission expires first Monday of January, **2012**

SEAL

AOPC 315-07

DATE PRINTED: **4/29/08** 9:00:00 AM

WOT-0723

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

UNIFUND CCR PARTNERS :
ASSIGNEE OF PALISADES : CIVIL ACTION
ACQUISITION XVI, :
10625 Techwoods Circle :
Cincinnati, OH 45242 :
Plaintiff :
vs. :
NO: 08-972-CD
ROBERT A CONKLIN :
1439 TURNPIKE AVE :
CLEARFIELD PA 16830 :
Defendant :

NOTICE TO DEFEND

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 to Defend are served, by entering a written appearance personally or by an 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.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ON AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT REDUCED FEE OR NO FEE.

MIDPENN LEGAL SERVICES
211 1/2 E LOCUST STREET
CLEARFIELD, PA 16830
814-765-9646

FILED
MAY 27 2008
2cc
Atty Best
MAY 27 2008

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

UNIFUND CCR PARTNERS :
ASSIGNEE OF PALISADES : CIVIL ACTION
ACQUISITION XVI, :
10625 Techwoods Circle :
Cincinnati, OH 45242 :
Plaintiff :
:

vs.

ROBERT A CONKLIN :
1439 TURNPIKE AVE :
CLEARFIELD PA 16830 :
Defendant :

COMPLAINT

Plaintiff, UNIFUND CCR PARTNERS ASSIGNEE OF PALISADES ACQUISITION XVI, by and through its attorneys, Edwin A. Abrahamsen & Associates, P.C., complains of the Defendant as follows:

1. Plaintiff, UNIFUND CCR PARTNERS ASSIGNEE OF PALISADES ACQUISITION XVI, (hereinafter "Plaintiff") is a Ohio corporation with a principal place of business located at 10625 Techwoods Circle, Cincinnati, OH 45242.
2. The Defendant ROBERT A CONKLIN (hereinafter "Defendant") is an adult individual residing at 1439 TURNPIKE AVE CLEARFIELD PA 16830.
3. At all relevant times herein, Plaintiff was engaged in the business of debt purchase and collection.
4. On January 23, 2008 Plaintiff initiated legal action to recover the within past due credit card account by filing Complaint in Magesterial District Court 46-3-02.
5. This Court of Common Pleas Complaint is the Appeal of the judgement awarded

to Defendant in that court.

6. Defendant applied for and received a credit card issued by HOUSEHOLD BANK NEVADA NA with the account number 5433390004576444.

7. The within account was sold by HOUSEHOLD BANK NEVADA NA to Unifund for valuable consideration and all rights under said accounts were assigned to Unifund. (See, Bill of Sale, Affidavit and Assignment attached hereto as Exhibit "A.")

8. Use of the HOUSEHOLD BANK NEVADA NA credit card was subject to the terms of the Cardmember Agreement, a copy of which was sent to the Defendant along with the credit card. (See, Cardmember Agreement attached hereto as Exhibit "B.")

9. Defendant used the HOUSEHOLD BANK NEVADA NA credit card account number 5433390004576444, for purchases, cash advances and/or balance transfers.

10. The Defendant was mailed account statements relative to the Defendant's use of the subject credit card.

11. The Defendant defaulted under the terms of the Agreement by failing and refusing to make monthly payments on the account as they became due.

12. The account became delinquent on February 28, 2004.

13. The principal amount was \$3,653.37 at the time it was received by Plaintiff.

14. Pursuant to the account agreement, any unpaid balance accrues interest at the rate of 6.

15. The total amount due and owing the Plaintiff including interest, is \$4,752.80.

16. Pursuant to the terms of the Agreement, Defendant is liable to Plaintiff for court costs and reasonable attorney's fees.

WHEREFORE, Plaintiff requests judgment in its favor and against Defendant in the amount of \$4,752.80 plus costs of suit, reasonable attorneys' fees and any other relief as the Court deems just and appropriate.

Respectfully submitted,



Edwin A. Abrahamsen & Assoc.
Michael F. Ratchford, Esquire
Scott J. Best, Esquire
Attorney I.D. Nos.: 86285/93600
1729 Pittston Avenue
Scranton, PA 18505
mratchford@eaa-law.com
sbest@eaa-law.com

VERIFICATION

I, Scott J. Best, attorney for Plaintiff, UNIFUND CCR PARTNERS ASSIGNEE OF PALISADES ACQUISITION XVI, am fully familiar with the facts set forth in the within Complaint and am authorized to make this Verification on behalf of Plaintiff. I Verify that the facts set forth in the within allegations are true and correct to the best of my knowledge, knowing that any false statements are punishable by law pursuant to 18 C.S.A. 4904.



Scott J. Best, Esquire

Exhibit A

BILL OF SALE

Subject to the terms and conditions of that certain Sale Agreement, dated as of March 5, 2007 (the "Agreement"), between PALISADES ACQUISITION XV, LLC ("Seller"), a Delaware limited liability company organized under the laws of the State of Delaware with its headquarters/principal place of business at 210 Sylvan Avenue, Englewood Cliffs, New Jersey 07632 and PALISADES ACQUISITION XVI, LLC ("Buyer"), a Delaware limited liability company organized under the laws of the State of Delaware with its headquarters/principal place of business at 210 Sylvan Avenue, Englewood Cliffs, New Jersey 07632, and for the consideration set forth in the Agreement and for other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, Seller does hereby sell, convey, assign, transfer, set over and deliver to Buyer all of Seller's right, title and interest in all of the Receivable Assets, which such Receivable Assets are more fully described in the Agreement.

This Bill of Sale is being delivered pursuant to the Agreement and is subject to each of the terms set forth therein.

This Bill of Sale shall be binding upon, and shall inure to the benefit of, the parties hereto and their respective successors and assigns.

Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Agreement.

[signature page follows]

IN WITNESS WHEREOF, Seller has caused this Bill of Sale to be executed on its behalf by its duly authorized officer as of this 5 day of March, 2007.

PALISADES ACQUISITION XV, LLC

By: 
Name: Mitchell S. Shulman
Title: Manager

Exhibit A

AFFIDAVIT OF INDEBTEDNESS

State of Ohio)
County of Hamilton) ss.

Kim Kenney, being sworn, deposes and says that she is an authorized representative of Unifund CCR Partners, servicer, which is doing business at 10625 Techwoods Circle, Cincinnati, Ohio 45242, and that she is authorized to make the following statements and representations which are within her personal knowledge, and that she is competent to testify to the matters stated herein.

To the best of her knowledge the Defendant is not now in the Military Service as defined in the Soldier's and Sailor's Civil Relief Act of 1940 and amendments thereto.

There is due and payable from ROBERT A CONKLIN, Account Number 5433390004576444, the amount of \$4429.80.

This account was issued under the name of HOUSEHOLD BANK NEVADA NA and acquired from Palisades Acquisition XVI LLC. Said account has been forwarded to Law Ofcs of Edwin A. Abrahamsen & A, as attorney for Plaintiff Unifund CCR Partners assignee of Palisades Acquisitions XVI LLC, for the purpose of the commencement of a legal suit, with full power and authority to do and perform all acts necessary for the collection, adjustment, compromise or satisfaction of said claim as permitted by law.

I do solemnly declare and affirm under the penalties of perjury that the matters set forth above are true and correct to the best of my knowledge.

Kenney DATED this 10/29/2007

UNIFUND CCR PARTNERS

By: Kim Kenney, Authorized Representative
Title

10625 Techwoods Circle, Cincinnati, OH 45242
Address

I hereby certify that on 10/29/2007, before me, the subscriber, a Notary Public for the State/County aforesaid, personally appeared the above-stated affiant, and made oath in due form of law.

Bengade Notary Public
My commission Expires

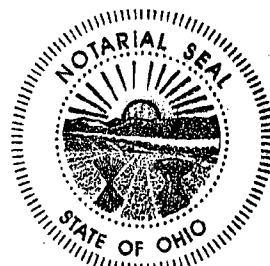


Exhibit B

1300

ACCOUNT NUMBER	BALANCE AS OF 10/26/2007	PAYMENT DUE DATE	MINIMUM PAYMENT	PAYMENT ENCLOSED
5433390004576444	4,429.80	PAST DUE	4,429.80	\$

Make Checks Payable To Unifund

UNIFUND STATEMENT

ROBERT A CONKLIN
1439 TURNPIKE AVE
CLEARFIELD PA 16830

MESSAGE FROM UNIFUND

YOUR ACCOUNT IS PAST DUE \$4,429.80. THE PAST DUE AMOUNT IS INCLUDED IN THE MINIMUM PAYMENT. PLEASE REMIT IMMEDIATELY. IF YOU HAVE ALREADY SENT A PAYMENT FOR THE ABOVE AMOUNT, THANK YOU.

TRANSACTIONS:

Date	Transaction	Balance	Due	Payments	New Balance
10/26/2007	This Account Was Issued Under The Name Of HOUSEHOLD BANK NEVADA AND Acquired From Palisades Acquisition XVI LLC.	4,429.80	4,429.80	0	4,429.80

PROMPT CREDITING OF PAYMENTS. TO RECEIVE CREDIT FOR PAYMENTS AS OF THE DATE OF RECEIPT, WE MUST RECEIVE YOUR CHECK OR MONEY ORDER AT:

UNIFUND
10625 TECHWOODS CIRCLE
CINCINNATI, OH 45242

PAYMENTS RECEIVED AT THE ABOVE ADDRESS IN THE MANNER SPECIFIED AFTER THAT TIME WILL BE CREDITED TO YOUR ACCOUNT AS OF OUR NEXT BUSINESS DAY. THE CREDITING TO YOUR ACCOUNT OF PAYMENTS RECEIVED AT ANY LOCATION OTHER THAN THE ABOVE ADDRESS MAY BE DELAYED UP TO 5 DAYS OF RECEIPT.

THIS COMMUNICATION IS FROM A DEBT COLLECTOR. FEDERAL LAW REQUIRES US TO INFORM YOU THAT THIS IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

8 tidings

FILED

MAY 27 2008

William A. Shaw
Prothonotary/Clerk of Courts

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: **CLEARFIELD**

Mag. Dist. No.:

46-3-02

MDJ Name: Hon.

RICHARD A. IRELAND
Address: **650 LEONARD ST**
STE 113
CLEARFIELD, PA

Telephone: (814) 765-5335 **16830**

RICHARD A. IRELAND
650 LEONARD ST
STE 113
CLEARFIELD, PA 16830

NOTICE OF JUDGMENT/TRANSCRIPT
CIVIL CASE

PLAINTIFF:

UNIFUND CCR PARTNERS
1729 PITTSSTON AVE
SCRANTON, PA 18505

NAME and ADDRESS

DEFENDANT:

CONKLIN, ROBERT A
1439 TURNPIKE AVE
CLEARFIELD, PA 16830

NAME and ADDRESS

Docket No.: **CV-0000026-08**
Date Filed: **1/23/08**



08-972-CD

4/28/08

THIS IS TO NOTIFY YOU THAT:

Judgment: **FOR DEFENDANT**

(Date of Judgment) **4/28/08**

<input checked="" type="checkbox"/> Judgment was entered for: (Name) CONKLIN, ROBERT A
<input checked="" type="checkbox"/> Judgment was entered against: (Name) UNIFUND CCR PARTNERS , in the amount of \$.00
<input type="checkbox"/> Defendants are jointly and severally liable.
<input type="checkbox"/> Damages will be assessed on Date & Time _____
<input type="checkbox"/> This case dismissed without prejudice.
<input type="checkbox"/> Amount of Judgment Subject to Attachment/42.Pa.C.S. § 8127 \$ _____
<input type="checkbox"/> Portion of Judgment for physical damages arising out of residential lease \$ _____

Amount of Judgment	\$.00
Judgment Costs	\$.00
Interest on Judgment	\$.00
Attorney Fees	\$.00
Total	\$.00
Post Judgment Credits	\$ _____
Post Judgment Costs	\$ _____
Certified Judgment Total \$ _____	

ANY PARTY HAS THE RIGHT TO APPEAL WITHIN 30 DAYS AFTER THE ENTRY OF JUDGMENT BY FILING A NOTICE OF APPEAL WITH THE PROTHONOTARY/CLERK OF THE COURT OF COMMON PLEAS, CIVIL DIVISION. YOU MUST INCLUDE A COPY OF THIS NOTICE OF JUDGMENT/TRANSCRIPT FORM WITH YOUR NOTICE OF APPEAL.

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FILED *NO Cc*
MTO: Shaw
MAY 30 2008 *(initials)*

William A. Shaw
Prothonotary/Clerk of Courts

APR 28 2008 Date *Richard Ireland*, Magisterial District Judge

I certify that this is a true and correct copy of the record of the proceedings containing the judgment.

MAY 28 2008 Date *Richard Ireland*, Magisterial District Judge

My commission expires first Monday of January, **2012**

SEAL

AOPC 315-07

DATE PRINTED: **4/29/08 9:00:00 AM**

IN THE COURT OF COMMON PLEAS
CLEARFIELD COUNTY, PENNSYLVANIA

UNIFUND CCR PARTNERS.
ASSIGNEE OF PALISADES
ACQUISITION OF PALISADES
ACQUISITION XVI
10625 Techwoods Circle
Cincinnati, OH 45242

CIVIL ACTION

NO: 08-972-CD

Plaintiff

Robert A Conklin
1439 TURNPIKE AVE
CLEARFIELD PA 16830

Defendant

CERTIFICATE OF SERVICE

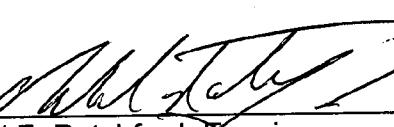
I, Michael Ratchford, Esquire, hereby certify that I caused a true and correct copy of the Plaintiff's Proof of Service of Appeal to be served as set forth below, on the date indicated upon the following:

VIA CERTIFIED MAIL
ROBERT A CONKLIN
CLEARFIELD PA 16830

Date:

6/03/08

By:


Michael F. Ratchford, Esquire
Attorney I.D. No.: 86285

FILED *10:11 AM*
JUN 05 2008
NO cc
BN
William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

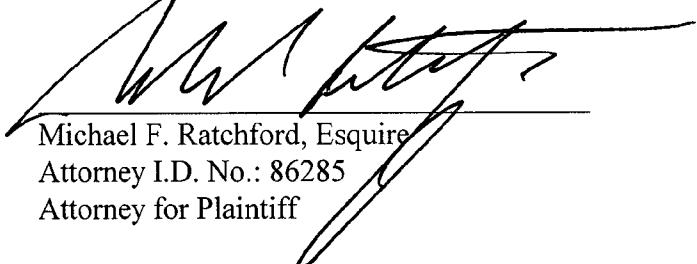
UNIFUND CCR PARTNERS :
ASSIGNEE : CIVIL DIVISION
OF PALISADES ACQUISITION XVI, :
:
:
Plaintiff :
:
vs. : NO: 08-972-CD
:
ROBERT A CONKLIN :
:
:
Defendant :
:
:

PRAECIPE FOR ENTRY OF DEFAULT JUDGMENT

TO THE CLERK OF JUDICIAL RECORDS:

Kindly enter judgment by default for failure to respond to Plaintiff's Complaint in the amount of \$4,752.80. Notice of the intent to file a default judgment was served upon the Defendant on May 04, 2009. A copy of the Notice of Intent to Take Default Judgment is attached hereto and marked Exhibit "A."

Edwin A. Abrahamsen & Associates, P.C.

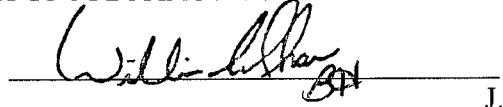


Michael F. Ratchford, Esquire
Attorney I.D. No.: 86285
Attorney for Plaintiff

JUDGMENT

AND NOW, this 20th day of May, 2009 Judgment is hereby entered in favor of the Plaintiff and against the Defendant in the amount of \$4,752.80 for failure to respond to Plaintiff's Complaint.

CLERK OF JUDICIAL RECORDS



J.

FILED Atty pd.
MAY 12 2009 2000
MAY 20 2009
ICC Notice
to Def.
S William A. Shaw
Prothonotary/Clerk of Courts

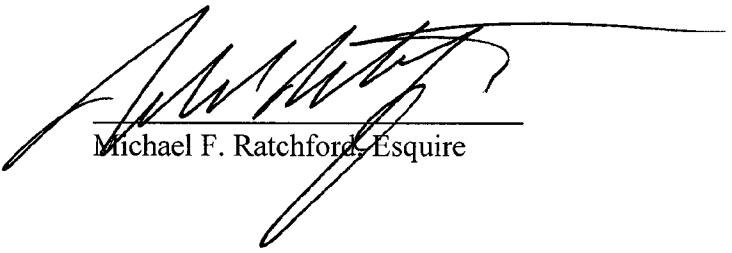
UNIFUND CCR PARTNERS ASSIGNEE
OF PALISADES ACQUISITION XVI, : In the Court of Common Pleas of
Plaintiff : CLEARFIELD County, Pennsylvania
: Civil Division
vs. :
: NO: 08-972-CD
ROBERT A CONKLIN :
: :
Defendant : AFFIDAVIT UNDER SOLDIERS AND SAILORS
: RELIEF CIVIL RELIEF ACT OF 1940 AS
: AMENDED

State of Pennsylvania
County of CLEARFIELD SS:

Michael F. Ratchford, Esquire being duly sworn according to law deposes and says that the above named defendant(s): ROBERT A CONKLIN is(are) not in the military service of the United States of America as defined by the Soldiers' and Sailors' Civil Relief Act of 1940 as amended;

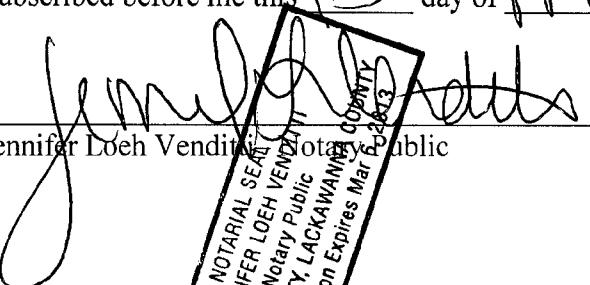
That the defendant(s): ROBERT A CONKLIN is(are) older than eighteen years of age;

That the employment status of the defendant(s): ROBERT A CONKLIN is(are) unknown.

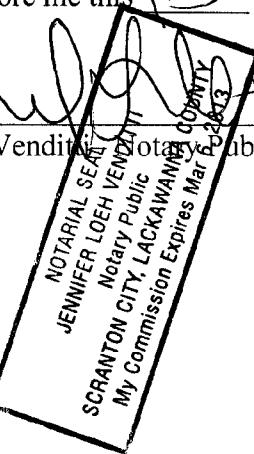


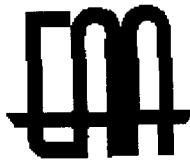
Michael F. Ratchford, Esquire

Subscribed before me this 15th day of May 2009



Jennifer Loeh Venditti Notary Public





EDWIN A. ABRAHAMSEN
MICHAEL F. RATCHFORD
HEATHER K. WOODRUFF*
*ALSO MEMBER OF FL BAR

THE LAW OFFICE OF
EDWIN A. ABRAHAMSEN & ASSOCIATES, P.C.
WWW.EAA-LAW.COM

May 4, 2009

ROBERT A CONKLIN
1439 TURNPIKE AVE
CLEARFIELD PA 16830

Re: **UNIFUND CCR PARTNERS ASSIGNEE OF PALISADES ACQUISITION
XVI, v. ROBERT A CONKLIN**
CLEARFIELD County Civil Action No.: 08-972-CD
Our file No.: 007-0723

Dear ROBERT A CONKLIN:

Enclosed please find the Ten Day Notice of Intent to Take Default in regard to the above-noted matter. Please act accordingly.

If you have any questions or wish to discuss your outstanding account, please contact me at (570) 558-5510.

Edwin A. Abrahamsen & Associates,



Michael F. Ratchford, Esquire

Enclosure

This is a communication from a debt collector in an attempt to collect a debt. Any information will be used for that purpose.

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

UNIFUND CCR PARTNERS :
ASSIGNEE : CIVIL ACTION
OF PALISADES ACQUISITION XVI. :
:
:
Plaintiff :
:
: NO: 08-972-CJ
vs. :
:
ROBERT A CONKLIN :
:
:
Defendant :

TEN DAY NOTICE OF INTENT TO TAKE DEFAULT JUDGMENT

To: ROBERT A CONKLIN
1439 TURNPIKE AVE
CLEARFIELD PA 16830

Date of Notice: May 4, 2009

IMPORTANT NOTICE PURSUANT TO P.A.R.C.P. 237.1(a)(2)

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER AN APPEARANCE PERSONALLY OR BY AN 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.

MIDPENN LEGAL SERVICES
211 1/2 E LOCUST STREET
CLEARFIELD, PA 16830
814-765-9646

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

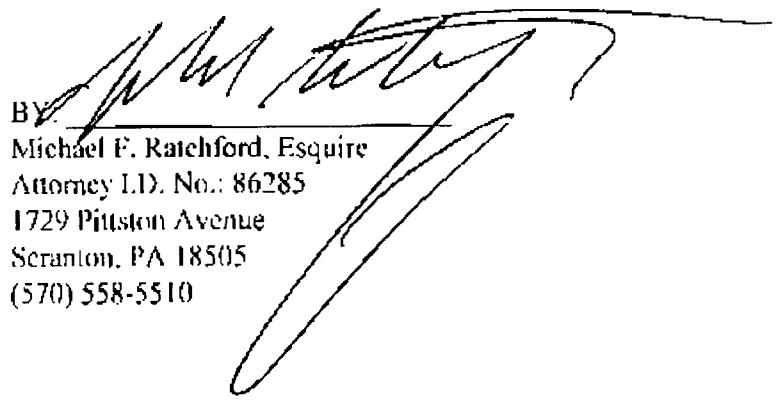
UNIFUND CCR PARTNERS :
ASSIGNEE : CIVIL ACTION
OF PALISADES ACQUISITION XVI. :
:
:
Plaintiff :
:
: NO: 08-972-CD
vs. :
:
ROBERT A CONKLIN :
:
:
Defendant :

CERTIFICATE OF SERVICE

I, Michael F. Ratchford, Esquire, hereby certify that on May 4, 2009 I served a copy of the Ten Day Notice of Intent to Take Default in the above captioned matter by mailing the same via First Class United States mail, postage prepaid addressed as follows:

ROBERT A CONKLIN
1439 TURNPIKE AVE
CLEARFIELD PA 16830

Edwin A. Abrahamson & Associates, P.C.

BY 
Michael F. Ratchford, Esquire
Attorney I.D. No.: 86285
1729 Pittston Avenue
Scranton, PA 18505
(570) 558-5510

Department of Defense Manpower Data Center

MAY-15-2009 13:31:38



Military Status Report
Pursuant to the Servicemembers Civil Relief Act

Last Name	First/Middle	Begin Date	Active Duty Status	Service/Agency
CONKLIN	ROBERT		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. Snavely-Dixon

Mary M. Snavely-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 by the requester. Providing an erroneous name or SSN will cause an erroneous certificate to be provided.

Report ID: **YCTQLBPDXY**

**IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA**

UNIFUND CCR PARTNERS :
ASSIGNEE :
OF PALISADES ACQUISITION XVI, :
Plaintiff : CIVIL DIVISION
vs. : NO: 08-972-CD
ROBERT A CONKLIN :
Defendant :

CERTIFICATE OF SERVICE

I, Michael F. Ratchford, Esquire, hereby certify that on the date indicated below, I served a copy of the Praeclipe for Entry of Default Judgment in the above captioned matter by mailing the same via First Class United States mail, postage prepaid addressed as follows:

ROBERT A CONKLIN
1439 TURNPIKE AVE
CLEARFIELD PA 16830

Edwin A. Abrahamsen & Associates, P.C.

Date: May 15, 2009

Michael F. Ratchford, Esquire
Attorney I.D. No.: 86285
1729 Pittston Avenue
Scranton, PA 18501
(570) 558-5510

UNIFUND CCR PARTNERS ASSIGNEE
OF PALISADES ACQUISITION XVI, :
Plaintiff : In the Court of Common Pleas of
: CLEARFIELD County, Pennsylvania
: Civil Division
vs. :
ROBERT A CONKLIN :
Defendant :
: NO: 08-972-CD

COPY

NOTICE OF FILING JUDGMENT

Notice is hereby given that a money judgment in the above-captioned matter has been entered
against you in the amount of \$ 4,752.80 on May 20, 2009.

By: William Abrahamsen

If you have any questions regarding this notice, please contact the filing party:

Edwin A. Abrahamsen & Associates
1729 Pittston Avenue
Scranton, PA 18505
Telephone: (570)-558-5510

(Notice is given in accordance with PA Supreme Court Rule of Civil Procedure No. 236)