



COURT OF COMMON PLEAS

FROM

JUDICIAL DISTRICT

DISTRICT JUSTICE JUDGMENT

46<sup>th</sup>

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 Unifund CCR Partners c/o Abrahamson		MAG. DIST. NO. OR NAME OF D.J. 46-3-02	
ADDRESS OF APPELLANT 1729 Pittston Ave		CITY Scranton	STATE PA
DATE OF JUDGMENT 4/28/08		ZIP CODE 18505	
IN THE CASE OF (Plaintiff) Unifund CCR Partners		(Defendant) Robert A Conklin	
CLAIM NO. CV 19 _____ LT 19 _____		SIGNATURE OF APPELLANT OR HIS ATTORNEY OR AGENT X [Signature]	

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

**FILED** Any Best pd. \$95.00  
m/12:54/64 (Billable)  
MAY 27 2008 1 copy to Any Best  
Def.  
mbs 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\_\_\_\_

COURT OF COMMON PLEAS

FROM

JUDICIAL DISTRICT

DISTRICT JUSTICE JUDGMENT

46<sup>th</sup>

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 Municipal Authority of the City of Philadelphia		MAG. DIST. NO. OR NAME OF D.J. 46 S.C.2	
ADDRESS OF APPELLANT 1731 Pine St. No.	CITY Philadelphia	STATE PA	ZIP CODE 19102
DATE OF JUDGMENT 4/29/08	IN THE CASE OF (Plaintiff) Municipal Authority of the City of Philadelphia		(Defendant) City of Philadelphia
CLAIM NO. CV 19 LT 19	SIGNATURE OF APPELLANT OR HIS ATTORNEY OR AGENT X [Signature]		

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.:	<b>46-3-02</b>
MDJ Name: Hon.	<b>RICHARD A. IRELAND</b>
Address:	<b>650 LEONARD ST STE 113 CLEARFIELD, PA</b>
Telephone:	<b>(814) 765-5335 16830</b>

**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 ABRHAMASEN & 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:**

Judgment: **FOR DEFENDANT** (Date of Judgment) **4/28/08**

☒ Judgment was entered for: (Name) **CONKLIN, ROBERT A**

☒ Judgment was entered against: (Name) **UNIFUND CCR PARTNERS,**  
in the amount of \$ **.00**

☐ Defendants are jointly and severally liable.

☐ Damages will be assessed on Date & Time \_\_\_\_\_

☐ This case dismissed without prejudice.

☐ Amount of Judgment Subject to Attachment/42 Pa.C.S. § 8127  
\$ \_\_\_\_\_

☐ Portion of Judgment for physical damages arising out of  
residential lease \$ \_\_\_\_\_

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

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 **Richard A. 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**

**007-0723**

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

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

Plaintiff :

CIVIL ACTION

vs.

ROBERT A CONKLIN  
1439 TURNPIKE AVE  
CLEARFIELD PA 16830

Defendant :

NO: 08-972-CD

**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

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

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

Plaintiff

CIVIL ACTION

NO:

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

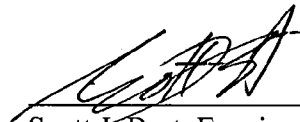
Scranton, PA 18505

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.

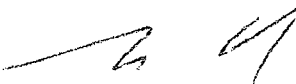
This Bill of Sale shall be binding upon, and shall inure to the benefit of, the parties hereto and their respective successors and assigns.

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 Sh  
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.

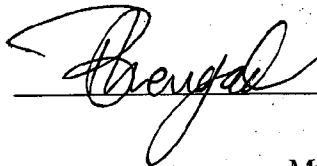
 DATED this 10/29/2007

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.



Notary Public

My commission Expires



BHARATI LENGADE  
NOTARY PUBLIC  
STATE OF OHIO  
Comm. Expires  
May 14, 2012

# 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 NAand 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.

**FILED**

**MAY 27 2008**

William A. Shaw  
Prothonotary/Clerk of Courts

8 tidings



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: **UNIFUND CCR PARTNERS**  
**1729 PITTSTON AVE  
SCRANTON, PA 18505**

VS.  
DEFENDANT: **CONKLIN, ROBERT A**  
**1439 TURNPIKE AVE  
CLEARFIELD, PA 16830**

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

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



**THIS IS TO NOTIFY YOU THAT:**

Judgment: **FOR DEFENDANT** (Date of Judgment) **4/28/08**

☒ Judgment was entered for: (Name) **CONKLIN, ROBERT A**

☒ Judgment was entered against: (Name) **UNIFUND CCR PARTNERS,**  
in the amount of \$ **.00**

☐ Defendants are jointly and severally liable.

☐ Damages will be assessed on Date & Time \_\_\_\_\_

☐ This case dismissed without prejudice.

☐ Amount of Judgment Subject to Attachment/42 Pa.C.S. § 8127  
\$ \_\_\_\_\_

☐ Portion of Judgment for physical damages arising out of  
residential lease \$ \_\_\_\_\_

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

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*  
*MAY 30 2008* *(60)*

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

Plaintiff

CIVIL ACTION

NO: 08-972-CD

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 RCERTIFIED MAIL  
ROBERT A CONKLIN  
CLEARFIELD PA 16830

Date:

6/03/08

By:

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

FILED

JUN 05 2008

William A. Shaw  
Prothonotary/Clerk of Courts

FILED

JUN 05 2008

William A. Shaw  
Prothonotary/Clerk of Courts

IN SENATE  
OF BARRELS COUNTY, PENNSYLVANIA

CIVIL ACTION

NO. 2008-100

UNION COR PARTNERS  
AS AGENT OF PALISADES  
ACQUISITION OF PALISADES

VS.

JOHN J. ...

...

...

I, William A. Shaw, Esquire, hereby certify that I caused a true and correct copy to be made of the foregoing and the same to be filed in the office of the Prothonotary/Clerk of Courts.

the Plaintiff's Proof of Service of Appeal to be served as set forth below on the date

indicated upon the following:

Addressed to: ...

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

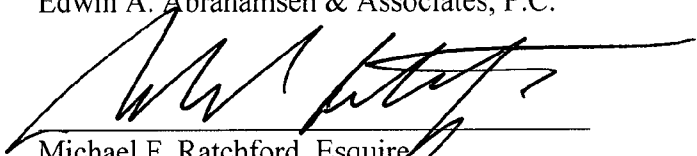
UNIFUND CCR PARTNERS :  
ASSIGNEE : CIVIL DIVISION  
OF PALISADES ACQUISITION XVI, :  
 :  
 :  
 :  
Plaintiff :  
 :  
 :  
vs. : NO: 08-972-CD  
 :  
 :  
ROBERT A CONKLIN :  
 :  
 :  
 :  
Defendant :  
 :

**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."

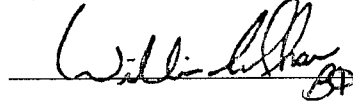
Edwin A. Abrahamsen & Associates, P.C.

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

**JUDGMENT**

AND NOW, this 20<sup>th</sup> 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**

MAY 20 2009

William A. Shaw  
Prothonotary/Clerk of Courts

Att'y pd.  
2000  
ICC Notice  
to Def.

(64)

UNIFUND CCR PARTNERS ASSIGNEE  
OF PALISADES ACQUISITION XVI,

Plaintiff

vs.

ROBERT A CONKLIN

Defendant

:  
: In the Court of Common Pleas of  
: CLEARFIELD County, Pennsylvania  
: Civil Division  
:

: NO: 08-972-CD  
:

: AFFIDAVIT UNDER SOLDIERS AND SAILORS  
: RELIEF CIVIL RELIEF ACT OF 1940 AS  
: AMENDED  
:

State of Pennsylvania  
County of CLEARFIELD SS:

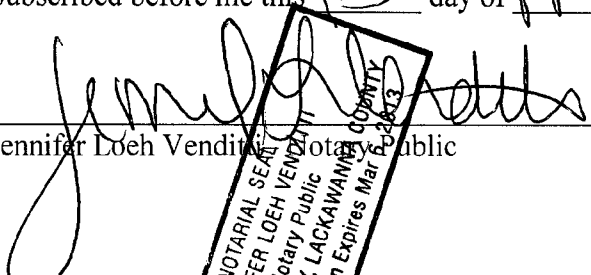
Michael F. Ratchford, Esquire being duly sworn according to law deposes and says that the above named defendant(s): ROBERT A CONKLIN is(are) not in the military service of the United States of America as defined by the Soldiers' and Sailors' Civil Relief Act of 1940 as amended;

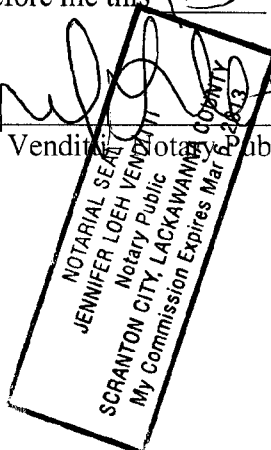
That the defendant(s): ROBERT A CONKLIN is(are) older than eighteen years of age;

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 Venditt, 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.:08-973-CD*  
Our file No.: U07-0723

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. Abrahamson & 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: <u>08-972-CD</u>
vs.	:	
	:	
ROBERT A CONKLIN	:	
	:	
	:	
Defendant	:	

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**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 :

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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. Abrahamsen & Associates, P.C.

BY: 

Michael F. Ratchford, Esquire  
Attorney ID. 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 "defenseink.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, :  
: CIVIL DIVISION  
:   
Plaintiff :  
: NO: 08-972-CD  
:   
vs. :  
:   
ROBERT A CONKLIN :  
:   
:   
Defendant :

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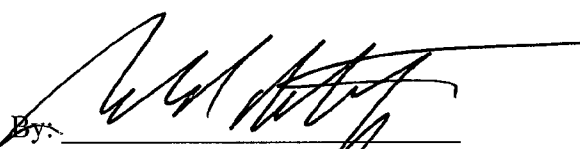
**CERIFICATE OF SERVICE**

I, Michael F. Ratchford, Esquire, hereby certify that on the date indicated below, I served a copy of the Praecipe 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

By:   
\_\_\_\_\_  
Michael F. Ratchford, Esquire  
Attorney I.D. No.: 86285  
1729 Pittston Avenue  
Scranton, PA 18506  
(570) 558-5510

UNIFUND CCR PARTNERS ASSIGNEE  
OF PALISADES ACQUISITION XVI,

Plaintiff

vs.

ROBERT A CONKLIN

Defendant

In the Court of Common Pleas of  
CLEARFIELD County, Pennsylvania  
Civil Division

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: \_\_\_\_\_



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)