

08-1057-CD
Atlantic Credit vs William Roland

**COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA**

ATLANTIC CREDIT & FINANCE INC.
ASSIGNEE FROM CITIBANK
 (Plaintiff)
 c/o Apothaker & Associates, P.C.
2417 Welsh Road, Suite 21 #520
 (Street Address)
Philadelphia, PA 19114
 (City, State, ZIP)

CIVIL ACTION

No. 2008-1057-cd

Type of Case: CIVIL

Type of Pleading: PLEADING

VS.

Filed on Behalf of:

WILLIAM ROLAND
 (Defendant)
170 ROLAND DR
 (Street Address)
WESTOVER, PA 16692
 (City, State, ZIP)

ATLANTIC CREDIT & FINANCE INC.
ASSIGNEE FROM
CITIBANK
 (Plaintiff)

FILED pd \$95.00 Atty
 m 11:40 am JUN 09 2008 1cc shfl
 1cc Atty
 (Signature)

William A. Shaw
 Prothonotary/Clerk of Courts

David J. Apothaker, Esq.
Apothaker & Associates, P.C.
 (Filed by)
 2417 Welsh Road, Suite 21 #520
Philadelphia, PA 19114
 (Address)
215 634-8920
 (Phone)

(Signature)

Our File No.: 158626
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

ATLANTIC CREDIT & FINANCE INC.)	COURT OF COMMON PLEAS
ASSIGNEE FROM CITIBANK)	CLEARFIELD COUNTY
c/o Apothaker & Associates, P.C.)	
2417 Welsh Road, Suite 21 #520)	NO.:
Philadelphia, PA 19114)	
Plaintiff,)	
vs.)	
WILLIAM ROLAND)	
170 ROLAND DR)	
WESTOVER, PA 16692)	
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 páginas siguientes, usted tiene veinte (20) días de plazo al partir de la fecha de la demanda y la notificación. Hace falta asentir una comparecencia 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 tomará medidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFFICIENTE DE PAGAR TAL SERVICIO. VAYA EN PERSONA O LLAME POR TELÉFONO A LA OFICINA CUYA DIRECCIÓN SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

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(215) 634-8920

Attorneys for Plaintiff

ATLANTIC CREDIT & FINANCE INC.

ASSIGNEE FROM CITIBANK

c/o Apothaker & Associates, P.C.

2417 Welsh Road, Suite 21 #520

Philadelphia, PA 19114

Plaintiff,

vs.

WILLIAM ROLAND

170 ROLAND DR

WESTOVER, PA 16692

Defendant.

) COURT OF COMMON PLEAS

) CLEARFIELD COUNTY

)

) NO.:

)

)

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CIVIL ACTION COMPLAINT FIRST COUNT

1. Plaintiff is ATLANTIC CREDIT & FINANCE INC. ASSIGNEE FROM CITIBANK c/o

Apothaker & Associates, P.C., 2417 Welsh Road, Suite 21 #520, Philadelphia, PA 19114.

2. Defendant(s) is/are WILLIAM ROLAND, an adult individual residing at 170 ROLAND DR
WESTOVER, PA 16692.

3. Plaintiff, ATLANTIC CREDIT & FINANCE INC. ASSIGNEE FROM CITIBANK, is the
Assignee and Successor in Interest of Account #4621203040376254; and said account was issued to
Defendant(s) by CITIBANK, the Original creditor.

4. Defendant received, accepted and used the account to its benefit.

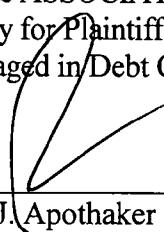
5. This account is in default and Defendant(s) has an unpaid balance of \$3,606.82. A true and correct
copy of the total due and owing is attached hereto, made a part hereof and marked as Exhibit "A".

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 \$3,606.82 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

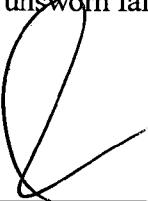
BY: 
David J. Apothaker

Dated: 6/3/2008

Our File No.: 158626

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: 6/3/2008

ATLANTIC CREDIT & FINANCE INC. ASSIGNEE FROM CITIBANK
c/o Apotheker & Associates, P.C.
2417 Welsh Road, Suite 21 #520
Philadelphia, PA 19114

WILLIAM ROLAND
170 ROLAND DR
WESTOVER, PA 16692

STATEMENT OF ACCOUNT

Debtor's Name: WILLIAM ROLAND
Account Number: 4621203040376254
Original Creditor: CITIBANK
Balance Due: \$3,606.82

Our File No.: 158626

EXHIBIT "A"

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
NO: 08-1057-CD

ATLANTIC CREDIT & FINANCE INC. Assignee
vs
WILLIAM ROLAND

SERVICE # 1 OF 1

COMPLAINT

SERVE BY: 07/09/2008

HEARING:

PAGE: 104259

FILED

03:44pm 06

JUN 16 2008

(6)

DEFENDANT: WILLIAM ROLAND
ADDRESS: 170 ROLAND DR.
WESTOVER, PA 16692

William A. Shaw
Prothonotary/Clerk of Courts

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

OCCUPIED

ATTEMPTS

SHERIFF'S RETURN

NOW, _____ AT _____ AM / PM SERVED THE WITHIN

COMPLAINT ON WILLIAM ROLAND, DEFENDANT

BY HANDING TO _____ / _____

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

ADDRESS SERVED _____

NOW _____ AT _____ AM / PM POSTED THE WITHIN

COMPLAINT FOR WILLIAM ROLAND

AT (ADDRESS) _____

NOW 16-16-08 AT 11:01 AM / PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF **NOT FOUND** AS TO WILLIAM ROLAND

REASON UNABLE TO LOCATE

Def. is living in Hastings, PA.

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

James E. Davis

Deputy Signature

James E. Davis

Print Deputy Name

SWORN TO BEFORE ME THIS

DAY OF _____ 2008

**COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA**

ATLANTIC CREDIT & FINANCE INC.
ASSIGNEE FROM CITIBANK
(Plaintiff)
c/o Apothaker & Associates, P.C.
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170 ROLAND DR
(Street Address)
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(City, State, ZIP)

ATLANTIC CREDIT & FINANCE INC.
ASSIGNEE FROM
CITIBANK
(Plaintiff)

I hereby certify this to be a true
and attested copy of the original
statement filed in this case.

JUN 09 2008

Attest.

William A. Apothaker
Prothonotary/
Clerk of Courts

David J. Apothaker, Esq.
Apothaker & Associates, P.C.
(Filed by)
2417 Welsh Road, Suite 21 #520
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(Phone)


(Signature)

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APOTHAKER & ASSOCIATES, P.C.
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Philadelphia, PA 19114
(215) 634-8920
Attorneys for Plaintiff

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ASSIGNEE FROM CITIBANK) CLEARFIELD COUNTY
c/o Apotheker & Associates, P.C.)
2417 Welsh Road, Suite 21 #520) NO.:
Philadelphia, PA 19114)
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BY: David J. Apotheker, Esq.
Attorney I.D.# 38423
2417 Welsh Road, Suite 21 #520
Philadelphia, PA 19114
(215) 634-8920
Attorneys for Plaintiff

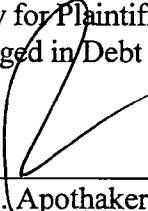
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ASSIGNEE FROM CITIBANK) CLEARFIELD COUNTY
c/o Apotheker & Associates, P.C.)
2417 Welsh Road, Suite 21 #520) NO.:
Philadelphia, PA 19114)
Plaintiff,)
vs.)
WILLIAM ROLAND)
170 ROLAND DR)
WESTOVER, PA 16692)
Defendant.)

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

BY: 
David J. Apothaker

Dated: 6/3/2008

Our File No.: 158626

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David J. Apothaker
Attorney for Plaintiff

DATE: 6/3/2008

ATLANTIC CREDIT & FINANCE INC. ASSIGNEE FROM CITIBANK
c/o Apotheker & Associates, P.C.
2417 Welsh Road, Suite 21 #520
Philadelphia, PA 19114

WILLIAM ROLAND
170 ROLAND DR
WESTOVER, PA 16692

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Original Creditor: CITIBANK
Balance Due: \$3,606.82

Our File No.: 158626

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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104259
NO: 08-1057-CD
SERVICES 1
COMPLAINT

PLAINTIFF: ATLANTIC CREDIT & FINANCE INC. Assignee
vs.
DEFENDANT: WILLIAM ROLAND

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	APOTHAKER	92856	10.00
SHERIFF HAWKINS	APOTHAKER	92856	47.33

FILED
03:03 PM
SEP 29 2008

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

So Answers,

____ Day of _____ 2008



Chester A. Hawkins
Sheriff

Our File No.: 158626
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 *cc Atty*
m 3:35 pm *Apothaker*
JUN 14 2010

William A. Shaw
Prothonotary/Clerk of Courts

ATLANTIC CREDIT & FINANCE
INC. ASSIGNEE FROM CITIBANK

) COURT OF COMMON PLEAS
) CLEARFIELD COUNTY

Plaintiff,

)

vs.

)

WILLIAM ROLAND

) NO. 2008-1057-CD

)

Defendant.

)

)

)

)

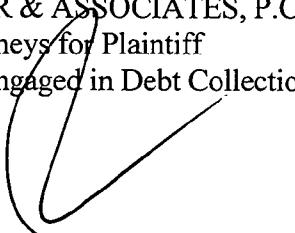
PRAECIPE TO DISMISS WITHOUT PREJUDICE

TO THE PROTHONOTARY:

Kindly dismiss this action without prejudice.

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

By:



David J. Apothaker, Esquire

Dated: 6/8/2010