



**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:

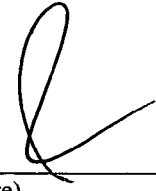
WILLIAM ROLAND  
(Defendant)  
170 ROLAND DR  
(Street Address)  
WESTOVER, PA 16692  
(City, State, ZIP)

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

**FILED** pd \$95.00 Atty  
m/1:40pm 1cc shff  
JUN 09 2008 1cc Atty  
(5)

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 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. Ademias, 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.

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APOTHAKE & ASSOCIATES, P.C.

BY: David J. Apothaker, Esq.

Attorney I.D.# 38423

2417 Welsh Road, Suite 21 #520

Philadelphia, PA 19114

(215) 634-8920

Attorneys for Plaintiff

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.

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

BY: \_\_\_\_\_

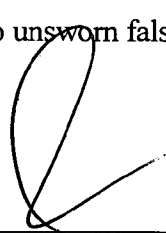
David J. Apothaker

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 Apothaker & 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 GK

JUN 16 2008

(60)

William A. Shaw  
Prothonotary/Clerk of Courts

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

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 6-16-08 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.

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

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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(City, State, ZIP)

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No. 2008-1057CD

Type of Case: CIVIL

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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)


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

JUN 09 2008

Attest.

*William R. 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)

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Attorneys for Plaintiff

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2417 Welsh Road, Suite 21 #520	)	NO.:
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Plaintiff,	)	
vs.	)	
	)	
WILLIAM ROLAND	)	
170 ROLAND DR	)	
WESTOVER, PA 16692	)	
Defendant.	)	

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APOTHAKE & ASSOCIATES, P.C.

BY: David J. Apothaker, Esq.

Attorney I.D.# 38423

2417 Welsh Road, Suite 21 #520

Philadelphia, PA 19114

(215) 634-8920

Attorneys for Plaintiff

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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.	)	

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FIRST COUNT

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

BY: \_\_\_\_\_

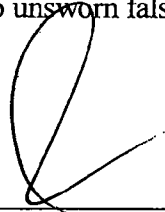
David J. Apothaker

Dated: 6/3/2008

Our File No.: 158626

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David J. Apothaker, 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.

A handwritten signature in black ink, consisting of a large loop and a trailing stroke, positioned above a horizontal line.

---

David J. Apothaker  
Attorney for Plaintiff

DATE: 6/3/2008

ATLANTIC CREDIT & FINANCE INC. ASSIGNEE FROM CITIBANK

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

WILLIAM ROLAND  
170 ROLAND DR  
WESTOVER, PA 16692

STATEMENT OF ACCOUNT

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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

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	APOTHAKE	92856	10.00
SHERIFF HAWKINS	APOTHAKE	92856	47.33

FILED  
013:03/04  
SEP 29 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.: 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** *icc Atty*  
*mj 3:35 am Apothaker*  
JUN 14 2010  
William A. Shaw  
Prothonotary/Clerk of Courts

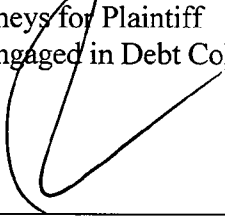
ATLANTIC CREDIT & FINANCE	)	COURT OF COMMON PLEAS
INC. ASSIGNEE FROM CITIBANK	)	CLEARFIELD COUNTY
	)	
Plaintiff,	)	
vs.	)	
	)	NO. 2008-1057-CD
WILLIAM ROLAND	)	
	)	
	)	
Defendant.	)	

**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