

08-1140-CD

Arrow Financial vs Jack T Fida

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY  
PENNSYLVANIA

FILED (15)

JUN 23 2008

William A. Shaw  
Prothonotary/Clerk of Courts

ARROW FINANCIAL SERVICES LLC

(Plaintiff)

c/o Apothaker & Associates, P.C.

2417 Welsh Road, Suite 21 #520

(Street Address)

Philadelphia, PA 19114

(City, State, ZIP)

CIVIL ACTION

No. 2008-1140-CD

Type of Case: CIVIL

Type of Pleading: PLEADING

VS.

Filed on Behalf of:

JACK T FIDA

(Defendant)

884 LEE RUN RD

(Street Address)

MAHAFFEY, PA 15757-9428

(City, State, ZIP)

ARROW FINANCIAL SERVICES

LLC

(Plaintiff)

David J. Apothaker, Esq.

Apothaker & Associates, P.C.

(Filed by)

2417 Welsh Road, Suite 21 #520

Philadelphia, PA 19114

(Address)

215 634-8920

(Phone)

(Signature)

Our File No.: 167364  
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

ARROW FINANCIAL SERVICES LLC	)	COURT OF COMMON PLEAS
c/o Apothaker & Associates, P.C.	)	CLEARFIELD COUNTY
2417 Welsh Road, Suite 21 #520	)	
Philadelphia, PA 19114	)	NO.:
Plaintiff,	)	
vs.	)	
	)	
JACK T FIDA	)	
884 LEE RUN RD	)	
MAHAFFEY, PA 15757-9428	)	
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.

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

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

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

ARROW FINANCIAL SERVICES LLC	)	COURT OF COMMON PLEAS
c/o Apothaker & Associates, P.C.	)	CLEARFIELD COUNTY
2417 Welsh Road, Suite 21 #520	)	
Philadelphia, PA 19114	)	NO.:
Plaintiff,	)	
vs.	)	
	)	
JACK T FIDA	)	
884 LEE RUN RD	)	
MAHAFFEY, PA 15757-9428	)	
Defendant.	)	
	)	

CIVIL ACTION COMPLAINT  
FIRST COUNT

1. Plaintiff is ARROW FINANCIAL SERVICES LLC c/o Apothaker & Associates, P.C., 2417 Welsh Road, Suite 21 #520, Philadelphia, PA 19114.
2. Defendant(s) is/are JACK T FIDA, an adult individual residing at 884 LEE RUN RD MAHAFFEY, PA 15757-9428.
3. Plaintiff, ARROW FINANCIAL SERVICES LLC, is the Assignee and Successor in Interest of Account #4128002293214941; 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 \$4,160.69. 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 \$4,160.69 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

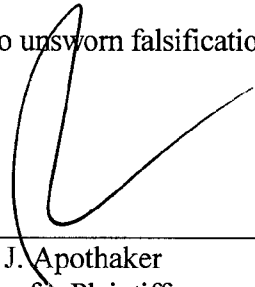
BY: \_\_\_\_\_  
David J. Apothaker

Dated: 6/17/2008

Our File No.: 167364

**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.



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David J. Apothaker  
Attorney for Plaintiff

DATE: 6/17/2008

ARROW FINANCIAL SERVICES LLC

JACK T FIDA  
884 LEE RUN RD  
MAHAFFEY, PA 15757-9428

STATEMENT OF ACCOUNT

Debtor's Name:	JACK T FIDA
Account Number:	4128002293214941
Original Creditor:	CITIBANK
Balance Due:	\$4,160.69

Our File No.: 167364

EXHIBIT "A"

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

ARROW FINANCIAL SERVICES LLC  
vs  
JACK T. FIDA

NO: 08-140-CD

08-1140-CD

SERVICE # 1 OF 1

COMPLAINT

SERVE BY: 07/23/2008 HEARING: PAGE: 104320

DEFENDANT: JACK T. FIDA  
ADDRESS: 884 LEE RUN RD  
MAHAFFEY, PA 15757

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT OCCUPIED

ATTEMPTS

7-3-08-2:20pm N/H

7-7-08-10:53am N/H - Left Note

**SHERIFF'S RETURN**

NOW, 11<sup>TH</sup> DAY OF JULY AT 9:07 AM PM SERVED THE WITHIN

COMPLAINT ON JACK T. FIDA, DEFENDANT

BY HANDING TO JACK T. FIDA, DEF.

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

ADDRESS SERVED 1 N. 2<sup>ND</sup> ST. CLEARFIELD, PA 16830

NOW \_\_\_\_\_ AT \_\_\_\_\_ AM / PM POSTED THE WITHIN

COMPLAINT FOR JACK T. FIDA

AT (ADDRESS) \_\_\_\_\_

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

I MAKE RETURN OF **NOT FOUND** AS TO JACK T. FIDA

REASON UNABLE TO LOCATE \_\_\_\_\_

SWORN TO BEFORE ME THIS

\_\_\_\_\_ DAY OF \_\_\_\_\_ 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:



Deputy Signature

CHESTER A. HAWKINS  
Print Deputy Name



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104320  
NO: 08-1140-CD  
SERVICES 1  
COMPLAINT

PLAINTIFF: ARROW FINANCIAL SERVICES LLC  
vs.  
DEFENDANT: JACK T. FIDA

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	APOTHAKE	94549	10.00
SHERIFF HAWKINS	APOTHAKE	94549	90.00

3  
FILED  
012:57/30  
OCT 06 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.: 167364  
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

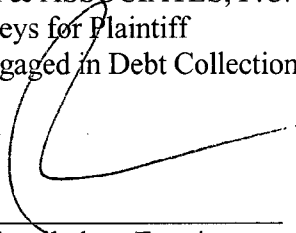
ARROW FINANCIAL SERVICES	)	COURT OF COMMON PLEAS
LLC	)	CLEARFIELD COUNTY
	)	
Plaintiff,	)	
vs.	)	
	)	NO. 2008-1140-CD
JACK T FIDA	)	
	)	
	)	
Defendant.	)	

**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: February 11, 2009

5 FILED No CC.  
m/11:40 am  
FEB 17 2009  
William A. Shaw  
Prothonotary/Clerk of Courts

**FILED**

**FEB 17 2009**

William A. Shaw  
Prothonotary/Clerk of Courts

2-17-09

no ccd no  
envelope to  
Return copy