

08-1149-CD

Atlantic Credit al vs William A. Harvey

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

FILED 

JUN 23 2008

12:15 (W)

William A. Shaw
Prothonotary/Clerk of Courts

CERT TO
ATTY &
SHER

ATLANTIC CREDIT & FINANCE INC.

ASSIGNEE FROM HSBC

(Plaintiff)

c/o Apothaker & Associates, P.C.

2417 Welsh Road, Suite 21 #520

(Street Address)

Philadelphia, PA 19114

(City, State, ZIP)

CIVIL ACTION

No. 2008-1149-CO

Type of Case: CIVIL

Type of Pleading: PLEADING

VS.

Filed on Behalf of:

WILLIAM A HARVEY

(Defendant)

523 E DUBOIS AVE

(Street Address)

DU BOIS, PA 15801

(City, State, ZIP)

ATLANTIC CREDIT & FINANCE INC.

ASSIGNEE FROM

HSBC

(Plaintiff)

David J. Apothaker, Esq.

Apothaker & Associates, P.C.

(Filed by)

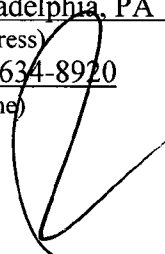
2417 Welsh Road, Suite 21 #520

Philadelphia, PA 19114

(Address)

215 634-8920

(Phone)



(Signature)

Our File No.: 165460
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 HSBC)	CLEARFIELD COUNTY
c/o Apothaker & Associates, P.C.)	
2417 Welsh Road, Suite 21 #520)	NC.:
Philadelphia, PA 19114)	
Plaintiff,)	
vs.)	
)	
WILLIAM A HARVEY)	
523 E DUBOIS AVE)	
DU BOIS, PA 15801)	
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

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 HSBC

c/o Apothaker & Associates, P.C.

2417 Welsh Road, Suite 21 #520

Philadelphia, PA 19114

Plaintiff,

vs.

WILLIAM A HARVEY

523 E DUBOIS AVE

DU BOIS, PA 15801

Defendant.

) COURT OF COMMON PLEAS

) CLEARFIELD COUNTY

) NO.:

CIVIL ACTION COMPLAINT
FIRST COUNT

1. Plaintiff is ATLANTIC CREDIT & FINANCE INC. ASSIGNEE FROM HSBC c/o Apothaker & Associates, P.C., 2417 Welsh Road, Suite 21 #520, Philadelphia, PA 19114.
2. Defendant(s) is/are WILLIAM A HARVEY, an adult individual residing at 523 E DUBOIS AVE DU BOIS, PA 15801.
3. Plaintiff, ATLANTIC CREDIT & FINANCE INC. ASSIGNEE FROM HSBC, is the Assignee and Successor in Interest of Account #5491098610350638; and said account was issued to Defendant(s) by HSBC, 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 \$3,977.09. 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 \$3,977.09 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: _____

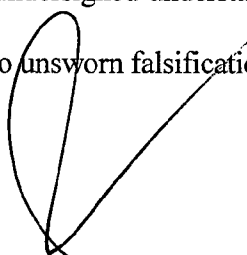
David J. Apothaker

Dated: 6/17/2008

Our File No.: 165460

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: 6/17/2008

ATLANTIC CREDIT & FINANCE INC. ASSIGNEE FROM HSBC

WILLIAM A HARVEY
523 E DUBOIS AVE
DU BOIS, PA 15801

STATEMENT OF ACCOUNT

Debtor's Name:	WILLIAM A HARVEY
Account Number:	5491098610350638
Original Creditor:	HSBC
Balance Due:	\$3,977.09

Our File No.: 165460

EXHIBIT "A"

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-1149-CD

ATLANTIC CREDIT & FINANCE INC. assignee
vs
WILLIAM A. HARVEY

SERVICE # 1 OF 1

COMPLAINT

SERVE BY: 07/23/2008 HEARING: PAGE: 104325

DEFENDANT: WILLIAM A. HARVEY
ADDRESS: 523 E. DUBOIS AVE.
DUBOIS, PA 15801

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT OCCUPIED

ATTEMPTS _____

SHERIFF'S RETURN

NOW, THIS 2ND DAY OF July 2008 AT 2:30 AM / PM **SERVED** THE WITHIN

COMPLAINT ON WILLIAM A. HARVEY, DEFENDANT

BY HANDING TO JULIA HARVEY / DEFENDANT'S WIFE

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

ADDRESS SERVED 523 EAST DUBOIS AVE, DUBOIS, PA. 15801

NOW _____ AT _____ AM / PM **POSTED** THE WITHIN

COMPLAINT FOR WILLIAM A. HARVEY

AT (ADDRESS) _____

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

I MAKE RETURN OF **NOT FOUND** AS TO WILLIAM A. HARVEY

REASON UNABLE TO LOCATE _____

SWORN TO BEFORE ME THIS

_____ DAY OF _____ 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY: *Mark A. Conozi*
Deputy Signature

Mark A. Conozi
Print Deputy Name

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104325
NO: 08-1149-CD
SERVICES 1
COMPLAINT

PLAINTIFF: ATLANTIC CREDIT & FINANCE INC. assignee
vs.
DEFENDANT: WILLIAM A. HARVEY

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	APOTHAKE	94553	10.00
SHERIFF HAWKINS	APOTHAKE	94553	40.23

FILED
012:57/01
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.: 165460
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 2 CC Atty
m/12.11cm
AUG 29 2011
Apotnaker
William A. Shaw
Prothonotary/Clerk of Courts

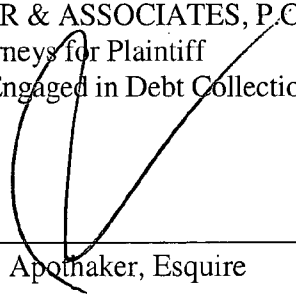
ATLANTIC CREDIT & FINANCE)	COURT OF COMMON PLEAS
INC. ASSIGNEE FROM HSBC)	CLEARFIELD COUNTY
)	
Plaintiff,)	
vs.)	
)	NO. 2008-1149-CD
WILLIAM A HARVEY)	
)	
)	
Defendant.)	

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: 8/10/2011

