

08-1149-CD  
Atlantic Credit al vs William A. Harvey

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

**FILED**

JUN 23 2008

m 112:15 (w)

William A. Shaw  
Prothonotary/Clerk of Courts

Clerk to  
Attala

SAC

**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

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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.	)	

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#### 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. Apotheker, 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	)	NO.:
Philadelphia, PA 19114	)	
Plaintiff,	)	
vs.	)	
WILLIAM A HARVEY	)	
523 E DUBOIS AVE	)	
DU BOIS, PA 15801	)	
Defendant.	)	

**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.

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

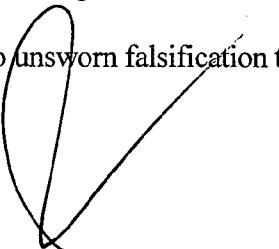
BY: \_\_\_\_\_  
David J. Apothaker

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.



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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"

0  
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

FILED

03:41 p.m. GK  
JUL 02 2008

(6X)

William A. Shaw  
Prothonotary/Clerk of Courts

**SHERIFF'S RETURN**

NOW, THIS 2<sup>ND</sup> 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. Condit

Deputy Signature

Mark A. Condit

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	APOTHAKER	94553	10.00
SHERIFF HAWKINS	APOTHAKER	94553	40.23

9/25/08  
**FILED**  
OCT 06 2008  
William A. Shaw  
Prothonotary/Clerk of Courts

Sworn to Before Me This

So Answers,

\_\_\_\_ Day of \_\_\_\_\_ 2008

*Chester A. Hawkins*

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 12.11 cm  
AUG 29 2011  
William A. Shaw  
Prothonotary/Clerk of Courts

ATLANTIC CREDIT & FINANCE  
INC. ASSIGNEE FROM HSBC

) COURT OF COMMON PLEAS  
 ) CLEARFIELD COUNTY

Plaintiff,

)

vs.

)

WILLIAM A HARVEY

) NO. 2008-1149-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: 8/10/2011

