

08-1215-CD

Atlantic Credit vs Ernest Nichols

165439

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

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. 2008-1215-CD

Type of Case: CIVIL

Type of Pleading: PLEADING

VS.

Filed on Behalf of:

ERNEST E NICHOLS

(Defendant)

21 E LONG AVE APT 602

(Street Address)

DUBOIS, PA 15801-2175

(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)

FILED

M 11:40 a.m. 66
JUL 02 2008

William A. Shaw
Prothonotary/Clerk of Courts

1 CC TO ATTY
1 Compl. TO SHFF

ATTY PAID
95.00

Our File No.: 165439
APOTHAKE & ASSOCIATES, P.C.
BY: David J. Apothaker, Esq.
Attorney I.D.#33423
2417 Welsh Road, Suite 21 #520
Philadelphia, PA 19114
(215) 634-3920
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.)	
)	
ERNEST E NICHOLS)	
21 E LONG AVE APT 602)	
DU BOIS, PA 15801-2175)	
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

APOTHEAKER & 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)	NO.:
Philadelphia, PA 19114)	
Plaintiff,)	
vs.)	
)	
ERNEST E NICHOLS)	
21 E LONG AVE APT 602)	
DU BOIS, PA 15801-2175)	
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 ERNEST E NICHOLS, an adult individual residing at 21 E LONG AVE APT 602 DU BOIS, PA 15801-2175.
3. Plaintiff, ATLANTIC CREDIT & FINANCE INC. ASSIGNEE FROM HSBC, is the Assignee and Successor in Interest of Account #5408010023870500; 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 \$2,550.68. 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 \$2,550.68 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

EY:

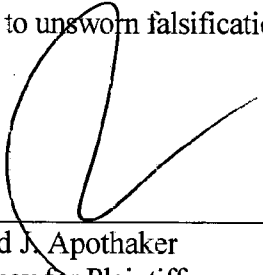
David J. Apothaker

Dated: 6/23/2008

Our File No.: 165439

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: 6/23/2008

ATLANTIC CREDIT & FINANCE INC. ASSIGNEE FROM HSBC

ERNEST E NICHOLS
21 E LONG AVE APT 602
DU BOIS, PA 15801-2175

STATEMENT OF ACCOUNT

Debtor's Name:	ERNEST E NICHOLS
Account Number:	5408010023870500
Original Creditor:	HSBC
Balance Due:	\$2,550.68

Our File No.: 165439

EXHIBIT "A"

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-1215-CD

ATLANTIC CREDIT & FINANCE INC. assignee

VS

ERNEST E. NICHOLS

SERVICE # 1 OF 1

COMPLAINT

SERVE BY: 08/01/2008

HEARING:

PAGE: 104364

DEFENDANT: ERNEST E. NICHOLS
ADDRESS: 21 E LONG AVE. APT 602
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 9th Day of JULY 2008 AT 2:46 AM (PM) **SERVED** THE WITHIN

COMPLAINT ON ERNEST E. NICHOLS, DEFENDANT

BY HANDING TO Ernest Nichols, Defendant

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

ADDRESS SERVED 21 E Long Ave (Lobby Area) Du Bois Pa - 15801

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

COMPLAINT FOR ERNEST E. NICHOLS

AT (ADDRESS) _____

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

I MAKE RETURN OF **NOT FOUND** AS TO ERNEST E. NICHOLS

REASON UNABLE TO LOCATE _____

SWORN TO BEFORE ME THIS

_____ DAY OF _____ 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY: Jerome M. Neryling
Deputy Signature

Jerome M. Neryling
Print Deputy Name

FILED

0132384
JUL 09 2008

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104364
NO: 08-1215-CD
SERVICES 1
COMPLAINT

PLAINTIFF: ATLANTIC CREDIT & FINANCE INC. assignee
vs.
DEFENDANT: ERNEST E. NICHOLS

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	APOTHAKE	95205	10.00
SHERIFF HAWKINS	APOTHAKE	95205	40.23

⁵
FILED
6/3:40 PM
OCT 13 2008

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

_____ Day of _____ 2008

So Answers,

Chester A. Hawkins

Chester A. Hawkins
Sheriff

Our File No.: 165439
APOTHAKER & ASSOCIATES, P.C.
BY: David J. Apothaker
Attorney I.D.# 38423
520 Fellowship Road C306
Mount Laurel, NJ 08054
(800) 672-0215
Attorney for Plaintiff

FILED
m 2:44 p.m. GK
FEB 19 2009
William A. Shaw
Prothonotary/Clerk of Courts

*Statement
ICC Atty
ICC & NOTICE Def*

(610)

ATLANTIC CREDIT & FINANCE INC)	COURT OF COMMON PLEAS OF
ASSIGNEE FROM HSBC)	CLEARFIELD COUNTY
)	
Plaintiff,)	
vs.)	NO.: 2008-1215-CD
)	
ERNEST E NICHOLS)	Civil Action
)	
Defendant.)	

PRAECIPE TO ENTER DEFAULT JUDGMENT

TO THE PROTHONOTARY:

Please enter a default judgment in favor of plaintiff, ATLANTIC CREDIT & FINANCE INC. ASSIGNEE FROM HSBC, and against Defendant, ERNEST E NICHOLS, for failure to answer or otherwise respond to the Complaint - Civil Action.

The Complaint was served upon the defendants on July 09, 2008 by the CLEARFIELD Sheriff's Department. Copies of the proofs of service are attached hereto as Exhibit "A".

I certify, a copy of the Notice of Intention To Take Default was mailed on November 10, 2008, and also attached hereto.

Assess damages in the amount of:

(a)	Balance:	\$2,550.68
(b)	Interest from June 23, 2008	\$85.78
(c)	Costs	\$145.23

TOTAL	\$2,781.69
-------	------------

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

By: _____
David J. Apothaker

Dated: 2/10/2009

**OFFICE OF THE PROTHONOTARY
COURT OF COMMON PLEAS**

TO: ERNEST E NICHOLS
21 E LONG AVE APT 602
DU BOIS, PA 15801-2175

ATLANTIC CREDIT & FINANCE
INC. ASSIGNEE FROM HSBC

Plaintiff,

vs.

ERNEST E NICHOLS

Defendant.

) COURT OF COMMON PLEAS OF
) CLEARFIELD COUNTY
)

) NO.: 2008-1215-CD
)

) Civil Action
)

NOTICE

Pursuant to Rule 236 of the Supreme Court of Pennsylvania, you are hereby notified that a Judgment has been entered against you in the above proceeding as indicated below.

XX JUDGMENT BY DEFAULT

___ JUDGMENT IN REPLEVIN

___ JUDGMENT BY CONFESSION

___ JUDGMENT FOR POSSESSION

___ JUDGMENT ON AWARD OF
ARBITRATORS

___ JUDGMENT ON VERDICT

___ JUDGMENT ON COURT FINDINGS

___ JUDGMENT ON WRIT OF REVIVAL

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE, PLEASE CALL:

ATTORNEY David J. Apothaker, Esq. at this telephone number: 215-634-8920

Our File No.: 165439
APOTHAKE & ASSOCIATES, P.C.
BY: David J. Apothaker
Attorney I.D.# 38423
520 Fellowship Road C306
Mount Laurel, NJ 08054
(800) 672-0215
Attorney for Plaintiff

ATLANTIC CREDIT & FINANCE)	COURT OF COMMON PLEAS OF
INC. ASSIGNEE FROM HSBC)	CLEARFIELD COUNTY
)	
Plaintiff,)	
vs.)	NO.: 2008-1215-CD
)	
ERNEST E NICHOLS)	Civil Action
)	
Defendant.)	

AFFIDAVIT OF NON-MILITARY SERVICE

COMMONWEALTH OF PENNSYLVANIA :
: SS.
COUNTY OF CLEARFIELD :

David J. Apothaker, being duly sworn according to law, deposes and says that I am the attorney for Plaintiff, and authorized to make this affidavit; that Defendant(s) resides at 21 E LONG AVE APT 602 DU BOIS, PA 15801-2175.

We inquired with the web site of the Defense Manpower Data Center, located at 1600 Wilson Boulevard, Suite 400, Arlington, VA 22209-2593, if the Defendant(s) is/are in any branch of the military.

Mary M. Snavely-Dixon, Director of the Defense Manpower Data Center has sent back our inquiry indicated that the Defendant(s) is/are not in the military.

David J. Apothaker
Attorney for Plaintiff

The above signed understands that the statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

Department of Defense Manpower Data Center

FEB-10-2009 10:40:03



Military Status Report
Pursuant to the Servicemembers Civil Relief Act

Last Name	First/Middle	Begin Date	Active Duty Status	Service/Agency
NICHOLS	ERNEST E	Based on the information you have furnished, the DMDC does not possess any information indicating that the individual is currently on active duty.		

Upon searching the information data banks of the Department of Defense Manpower Data Center, based on the information that you provided, the above is the current status of the individual as to all branches of the Military.

Mary M. Snavelly-Dixon

Mary M. Snavelly-Dixon, Director
Department of Defense - Manpower Data Center
1600 Wilson Blvd., Suite 400
Arlington, VA 22209-2593

The Defense Manpower Data Center (DMDC) is an organization of the Department of Defense that maintains the Defense Enrollment and Eligibility Reporting System (DEERS) database which is the official source of data on eligibility for military medical care and other eligibility systems.

The Department of Defense strongly supports the enforcement of the Servicemembers Civil Relief Act [50 USCS Appx. §§ 501 et seq] (SCRA) (formerly the Soldiers' and Sailors' Civil Relief Act of 1940). DMDC has issued hundreds of thousands of "does not possess any information indicating that the individual is currently on active duty" responses, and has experienced a small error rate. In the event the individual referenced above, or any family member, friend, or representative asserts in any manner that the individual is on active duty, or is otherwise entitled to the protections of the SCRA, you are strongly encouraged to obtain further verification of the person's active duty status by contacting that person's Military Service via the "defenselink.mil" URL provided below. If you have evidence the person is on active-duty and you fail to obtain this additional Military Service verification, provisions of the SCRA may be invoked against you.

If you obtain further information about the person (e.g., an SSN, improved accuracy of DOB, a middle name), you can submit your request again at this Web site and we will provide a new certificate for that query.

This response reflects current active duty status only. For historical information, please contact the Military Service SCRA points-of-contact.

See: <http://www.defenselink.mil/faq/pis/PC09SLDR.html>

WARNING: This certificate was provided based on a name and Social Security number (SSN) provided

**OFFICE OF THE PROTHONOTARY
COURT OF COMMON PLEAS
CLEARFIELD COUNTY**

ATLANTIC CREDIT & FINANCE INC.-ASSIGNEE)	COURT OF COMMON PLEAS
FROM HSBC)	CLEARFIELD COUNTY
)	
vs.)	
)	NO. 2008-1215-CD
ERNEST E NICHOLS)	

To: ERNEST E NICHOLS
21 E LONG AVE APT 602
DU BOIS, PA 15801-2175

NOTICE, RULE 237.5

NOTICE OF PRAECIPE TO ENTER JUDGMENT BY DEFAULT

Date of Notice: November 10, 2008

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE, IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

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

/s/ David J. Apothaker
DAVID J. APOTHAKE, ESQUIRE
APOTHAKE & ASSOCIATES, PC
A Law Firm Engaged in Debt Collection
520 Fellowship Road C306
Mount Laurel, NJ 08054
(800) 672-0215
Attorney for Plaintiff
Attorney ID #38423

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-1215-CD

ATLANTIC CREDIT & FINANCE INC. assignee
vs
ERNEST E. NICHOLS

SERVICE # 1 OF 1

COMPLAINT

SERVE BY: 08/01/2008

HEARING:

PAGE: 104364

COPY

DEFENDANT: ERNEST E. NICHOLS
ADDRESS: 21 E. LONG AVE. APT 602
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 9th DAY OF JULY 2008 AT 2:46 AM / (PM) SERVED THE WITHIN

COMPLAINT ON ERNEST E. NICHOLS DEFENDANT

BY HANDING TO ERNEST NICHOLS / Defendant

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

ADDRESS SERVED 21 E LONG Ave (Lobby Area) DUBOIS Pa. 15801

NOW _____ AT _____ AM / PM POSTED THE WITHIN

COMPLAINT FOR ERNEST E. NICHOLS

AT (ADDRESS) _____

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

I MAKE RETURN OF **NOT FOUND** AS TO ERNEST E. NICHOLS

REASON UNABLE TO LOCATE _____

SWORN TO BEFORE ME THIS

_____ DAY OF _____ 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY: Jerome M. Alexling
Deputy Signature

Jerome M. Alexling
Print Deputy Name

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY ,
PENNSYLVANIA
STATEMENT OF JUDGMENT

Atlantic Credit & Finance Inc.
HSBC
Plaintiff(s)

COPY

No.: 2008-01215-CD

Real Debt: \$2,781.69

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Ernest E. Nichols
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: February 19, 2009

Expires: February 19, 2014

Certified from the record this February 19, 2009



William A. Shaw, Prothonotary

SIGN BELOW FOR SATISFACTION

Received on _____, _____, of defendant full satisfaction of this Judgment,
Debt, Interest and Costs and Prothonotary is authorized to enter Satisfaction on the same.

Plaintiff/Attorney

Our File No.: 165439
APOTHAKER & ASSOCIATES, P.C.
By: Kimberly F. Scian, Esquire
Attorney I.D. #55140
520 Fellowship Road C306
Mount Laurel, NJ 08054
(800) 672-0215
Attorneys for Plaintiff

FILED
APR 06 2011
William A. Shaw
Prothonotary/Clerk of Courts
1cc
Amy
6/12

ATLANTIC CREDIT & FINANCE INC.)	COURT OF COMMON PLEAS OF
ASSIGNEE FROM HSBC)	CLEARFIELD COUNTY
)	
Plaintiff)	NO.: 2008-1215-CD
vs.)	
)	Civil Action
ERNEST E NICHOLS)	
)	
Defendant)	

MOTION TO AMEND CAPTION

1. On or about June 23, 2008 our firm filed a Civil Action Complaint captioned ATLANTIC CREDIT & FINANCE INC. ASSIGNEE FROM HSBC
vs. ERNEST E NICHOLS
2. Defendant's account with ATLANTIC CREDIT & FINANCE INC. ASSIGNEE FROM HSBC was recently purchased by MIDLAND FUNDING LLC.
3. The correct name for the Plaintiff should be MIDLAND FUNDING LLC.
4. Accordingly, the Plaintiff now respectfully petitions the Court to allow Plaintiff to Amend the caption to reflect the proper name of the Plaintiff, MIDLAND FUNDING LLC.
5. The Pennsylvania Rules of Civil Procedure, Pa.R.C.P. 1033, specifically permit parties to amend their pleadings:

A party, either by filed consent of the adverse party or by leave of court, may at any time change the form of action, correct the name of a party or amend his pleading. The amended pleading may aver transactions or occurrences which have happened before or after the filing of the original pleading, even though they give rise to a new cause of action or defense. An amendment may be made to conform the pleading to the evidence offered or admitted.

6. Defendant's rights will not be prejudiced by this change.

WHEREFORE, Plaintiff requests this court to enter an Order granting leave to amend Plaintiff's Complaint.

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

BY: 

Kimberly F. Scian, Esquire

Dated: March 30, 2011

Our File No.: 165439
APOTHAKE & ASSOCIATES, P.C.
By: Kimberly F. Scian, Esquire
Attorney I.D. #55140
520 Fellowship Road C306
Mount Laurel, NJ 08054
(800) 672-0215
Attorneys for Plaintiff

ATLANTIC CREDIT & FINANCE INC.)	COURT OF COMMON PLEAS OF
ASSIGNEE FROM HSBC)	CLEARFIELD COUNTY
)	
Plaintiff)	NO.: 2008-1215-CD
vs.)	
)	Civil Action
ERNEST E NICHOLS)	
)	
Defendant)	

**BRIEF IN SUPPORT OF PLAINTIFF'S
MOTION TO AMEND CAPTION**

Plaintiff, ATLANTIC CREDIT & FINANCE INC. ASSIGNEE FROM HSBC filed suit against Defendant on or about June 23, 2008. Plaintiff requests that this Court enter an Order allowing Plaintiff to file the Amended Complaint attached hereto pursuant to Pa.R.C.P. No. 1033.

WHEREFORE, ATLANTIC CREDIT & FINANCE INC. ASSIGNEE FROM HSBC, respectfully requests this Honorable Court grant Plaintiff's

Motion to Amend Caption.

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

BY: 

Kimberly F. Scian, Esquire

Dated: March 30, 2011

Our File No.: 165439
APOTHAKER & ASSOCIATES, P.C.
By: Kimberly F. Scian, Esquire
Attorney I.D. #55140
520 Fellowship Road C306
Mount Laurel, NJ 08054
(800) 672-0215
Attorneys for Plaintiff

ATLANTIC CREDIT & FINANCE INC.
ASSIGNEE FROM HSBC

Plaintiff

vs.

ERNEST E NICHOLS

Defendant

COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY

NO.: 2008-1215-CD

Civil Action

CERTIFICATION OF SERVICE

I, Kimberly F. Scian, Esquire, attorney for Plaintiff, certify that on March 30, 2011, I
mailed a copy of Plaintiff's Order, Motion to Amend Caption, and Brief in support thereof to:

ERNEST E NICHOLS
21 E LONG AVE APT 602
DU BOIS, PA 15801-2175

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

BY: 

Kimberly F. Scian, Esquire

Dated: March 30, 2011

CA

ATLANTIC CREDIT & FINANCE INC.
ASSIGNEE FROM HSBC

Plaintiff

vs.

ERNEST E NICHOLS

Defendant

COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY

NO.: 2008-1215-CD

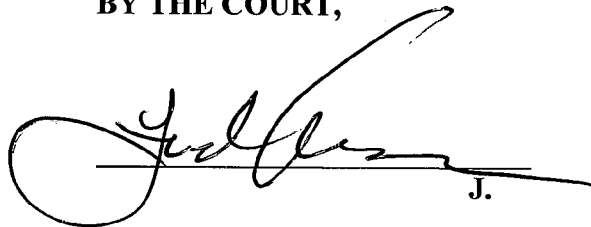
Civil Action

ORDER

AND NOW, this 7 day of April, 2011, upon consideration of the within
MOTION TO AMEND CAPTION, it is hereby ORDERED that the Caption be amended to
reflect the proper name of the Plaintiff as MIDLAND FUNDING LLC.

BY THE COURT:

BY THE COURT,



J.

FILED

APR 08 2011

William A. Shaw
Prothonotary/Clerk of Courts

ice
Atty Scian

GK

FILED

APR 08 2011

William A. Shaw
Prothonotary/Clerk of Courts

DATE: 4/8/11

☒ You are responsible for serving all appropriate parties.

☐ The Prothonotary's office has provided service to the following parties:

☐ Plaintiff(s) ☐ Plaintiff(s) Attorney ☐ Other

☐ Defendant(s) Attorney

Other designations: