

08-1238-CD

Portfolio Rec. vs Fawn Bell

138138

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

PORTFOLIO RECOVERY ASSOCIATES,
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. 2008-1238-CD

Type of Case: CIVIL

Type of Pleading: PLEADING

VS.

Filed on Behalf of:

FAWN BELL

(Defendant)

764 CURWENSVILLE GRAMPIAN HWY

(Street Address)

GRAMPIAN, PA 16838-7916

(City, State, ZIP)

PORTFOLIO RECOVERY ASSOCIATES,
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)

FILED

M 12:43 P.M. GK
JUL 07 2008

1cc Atty
1 COM. SHERIFF

William A. Shaw
Prothonotary/Clerk of Courts

Atty

**PORTFOLIO RECOVERY
ASSOCIATES, LLC**
c/o Apothaker & Associates, P.C.
2417 Welsh Road, Suite 21 #520
Philadelphia, PA 19114
Plaintiff,

vs.

FAWN BELL
764 CURWENSVILLE GRAMPIAN
HWY
GRAMPIAN, PA 16833-7916
Defendant.

) COURT OF COMMON PLEAS
) CLEARFIELD COUNTY

NO.:

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**

1. Plaintiff is PORTFOLIO RECOVERY ASSOCIATES, LLC c/o Apothaker & Associates, P.C., 2417 Welsh Road, Suite 21 #520, Philadelphia, PA 19114.
2. Defendant(s) is/are FAWN BELL, an adult individual residing at 764 CURWENSVILLE GRAMPIAN HWY GRAMPIAN, PA 16838-7916.
3. Plaintiff, PORTFOLIO RECOVERY ASSOCIATES, LLC, is the Assignee and Successor in Interest of Account #4479410625101394; and said account was issued to Defendant(s) by WASHINGTON MUTUAL BANK, 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 \$4,919.80. 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 \$4,919.80 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

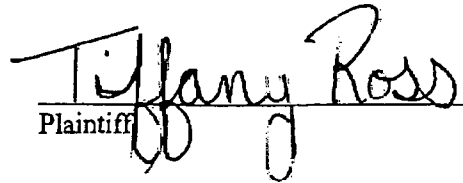
BY: _____
David J. Apothaker

Dated: 6/30/2008

Our File No.: 138138

VERIFICATION

Tiffany Ross, hereby states that I am
Legal Specialist 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.


Plaintiff

DATE:

PORTFOLIO RECOVERY ASSOCIATES, LLC

FAWN BELL
764 CURWENSVILLE GRAMPIAN HWY
GRAMPIAN, PA 16838-7916

STATEMENT OF ACCOUNT

Debtor's Name:	FAWN BELL
Account Number:	4479410625101394
Original Creditor:	WASHINGTON MUTUAL BANK
Balance Due:	\$4,919.80

Our File No.: 138138

EXHIBIT "A"

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-1238-CD

PORTFOLIO RECOVERY ASSOCIATES, LLC

vs

FAWN BELL

SERVICE # 1 OF 1

COMPLAINT

SERVE BY: 08/06/2008

HEARING:

PAGE: 104383

DEFENDANT:

FAWN BELL

ADDRESS:

764 CURWENSVILLE GRAMPIAN HWY.
GRAMPIAN, PA 16838

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

ATTEMPTS

7-21-08-2:24 PM

FILED

08:30 AM

JUL 23 2008

William A. Shaw

Recorder/Clerk of Courts

SHERIFF'S RETURN

NOW, 7-22-08 AT 2:08 AM ☒ PM SERVED THE WITHIN

COMPLAINT ON FAWN BELL, DEFENDANT

BY HANDING TO Jessica Bell, Daughter

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

ADDRESS SERVED 764 Curwensville - Grampian Hwy.
Grampian, PA. 16838

NOW _____ AT _____ AM / PM POSTED THE WITHIN

COMPLAINT FOR FAWN BELL

AT (ADDRESS) _____

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

I MAKE RETURN OF **NOT FOUND** AS TO FAWN BELL

REASON UNABLE TO LOCATE _____

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

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

PORTFOLIO RECOVERY
ASSOCIATES, LLC,
Plaintiff
vs.

:
:
:
: No. 08-1238-CD
:
:

FAWN BELL,
Defendant

CASE NUMBER: No. 08-1238-CD

TYPE OF CASE: Civil

TYPE OF PLEADING: DEFENDANT'S PRELIMINARY OBJECTIONS TO
PLAINTIFF'S COMPLAINT

FILED ON BEHALF OF: Defendant

COUNSEL OF RECORD FOR THIS PARTY: R. DENNING GEARHART, ESQUIRE
Supreme Court I.D. #26540
207 E. Market Street
Clearfield, PA 16830
(814) 765-1581

FILED 3CC
013:4051 Atty
AUG 15 2008 Gearhart
William A. Shaw
Prothonotary/Clerk of Courts

(62)

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

PORTFOLIO RECOVERY
ASSOCIATES, LLC,
Plaintiff

vs.

FAWN BELL,
Defendant

:
:
:
:
:
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:
:
:
:

No. 08-1238-CD

DEFENDANT'S PRELIMINARY OBJECTIONS TO
PLAINTIFF'S COMPLAINT

NOW COMES, the Defendant, Fawn Bell, by and through her Attorney, R. Denning Gearhart, Esquire, who files Preliminary Objections to Plaintiff's Complaint and respectfully avers as follows:

1. Plaintiff filed a Complaint in the Court of Common Pleas of Clearfield County, Pennsylvania, on or about July 7, 2008, alleging that Plaintiff furnished consumer credit to Defendant through an account with Washington Mutual Bank as the original creditor.
2. Plaintiff alleges that there is an unpaid balance on the account of Four Thousand Nine Hundred Nineteen and 80/100 (\$4,919.80) Dollars.
3. Plaintiff attached one page of what is alleged to be a statement of the account. However, Plaintiff failed to attach a copy of the original agreement Plaintiff alleges that Defendant breached.
4. Plaintiff has failed to produce detailed statements of the account showing all purchases made on said account and how Plaintiff calculates the amount that is due.

5. Plaintiff fails to state what, if any, charges were made for interest, late fees, and other various charges which may or may not have been imposed by Plaintiff and the legal authority for such charges.

6. Plaintiff's Complaint is insufficient on its face and should be dismissed because Plaintiff failed to produce an original copy of the agreement and a detailed monthly statement of the account setting out purchases made and costs incurred so that Defendant is able to calculate the details leading to the conclusion of the Plaintiff and enter into a proper defense of the claims.

WHEREFORE, Defendant respectfully requests that Plaintiff's Complaint be stricken pursuant to Pennsylvania Rule of Civil Procedure 1028 on the grounds of legal insufficiency.



R. Denning Gearhart, Esq.
Attorney for Defendant

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

PORTFOLIO RECOVERY
ASSOCIATES, LLC,
Plaintiff

vs.

FAWN BELL,
Defendant

No. 08-1238-CD

ORDER

AND NOW, this 18th Day of AUGUST, 2008, upon
consideration of Defendant's Preliminary Objections to Plaintiff's Complaint filed in the
above captioned action, it is the CRDER of this Court that a hearing be scheduled for the
2nd Day of October, 2008, at 2:00 O'clock P.M., in
Courtroom No. 1, of the Clearfield County Courthouse, Clearfield, Pennsylvania.

BY THE COURT

Judith J. Cunningham

JUDGE

FILED

01/10:26/08
AUG 19 2008

3CC
Atty Gearhart
CLO

William A. Shaw
Prothonotary/Clerk of Courts

D.

FILED
AUG 19 2008

William A. Shaw
Prothonotary/Clerk of Courts

DATE: 8/19/08

- ☒ 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) ☐ Defendant(s) Attorney
- ☐ Special Instructions:

FILED
AUG 19 2008
William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

PORTFOLIO RECOVERY	:	
ASSOCIATES, LLC,	:	
Plaintiff	:	
vs.	:	No. 08-1238-CD
	:	
FAWN BELL,	:	
Defendant	:	

CASE NUMBER: No. 08-1238-CD

TYPE OF CASE: Civil

TYPE OF PLEADING: CERTIFICATE OF SERVICE

FILED ON BEHALF OF: Defendant

COUNSEL OF RECORD FOR THIS PARTY: R. DENNING GEARHART, ESQUIRE
Supreme Court I.D. #26540
207 E. Market Street
Clearfield, PA 16830
(814) 765-1581

FILED ^{NO} _{CC}
0/347/84
AUG 23 2008
William A. Shaw
Prothonotary/Clerk of Courts

Dated: August 25, 2008

113

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

PORTFOLIO RECOVERY ASSOCIATES, LLC,*
Plaintiff

vs.

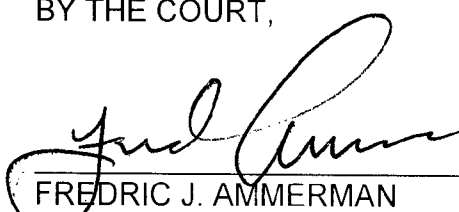
NO. 08-1238-CD

FAWN BELL,
Defendant

ORDER

NOW, this 2nd day of October, 2008, it is the ORDER of this Court that the Defendant's Preliminary Objections to the Plaintiff's Complaint be and are hereby granted. The Plaintiff shall have no more than 60 days from this date to file an Amended Complaint which shall contain a detailed statement of the account showing purchases made, the name the account was in and calculation of all interest charges, late fees, attorney's fees and any other costs or charges which are part of the demand for payment. A copy of the credit card agreement which covered the issuance and use of the credit card shall also be attached.

BY THE COURT,


FREDRIC J. AMMERMAN
President Judge

FILED

012:13/01
OCT 06 2008

William A. Shaw
Prothonotary/Clerk of Courts

ICCAlys:
Apothaker
Gearhart

CSU

FILED

OCT 06 2008

William A. Shaw
Prothonotary/Clerk of Courts

DATE: 10/6/08

☐ 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) ☒ Defendant(s) Attorney

☐ Special Instructions:

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104383
NO: 08-1238-CD
SERVICES 1
COMPLAINT

PLAINTIFF: PORTFOLIO RECOVERY ASSOCIATES, LLC
vs.
DEFENDANT: FAWN BELL

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	APOTHAKE	96493	10.00
SHERIFF HAWKINS	APOTHAKE	96493	46.08

5
FILED
0/3:40LM
OCT 13 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.: 138138
APOTHAKE & ASSOCIATES, P.C.
BY: Kimberly F. Scian, Esquire
Attorney I.D.#55140
520 Fellowship Road C306
Mount Laurel, NJ 08054
(300) 672-0215
Attorneys for Plaintiff

FILED

OCT 31 2008

W/12:05/AM
William A. Shaw
Prothonotary/Clerk of Courts

1 case to
Harry

PORTFOLIO RECOVERY
ASSOCIATES, LLC
c/o Apothaker & Associates, P.C.
520 Fellowship Road C306
Mount Laurel, NJ 08054

Plaintiff,

vs.

FAWN BELL
764 CURWENSVILLE GRAMPIAN
HWY
GRAMPIAN, PA 16838-7916
Defendant.

) COURT OF COMMON PLEAS
) CLEARFIELD COUNTY

) NO.: 2008-1238-CD

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.

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

Our File No.: 138138
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

PORTFOLIO RECOVERY
ASSOCIATES, LLC
c/o Apothaker & Associates, P.C.
520 Fellowship Road C306
Mount Laurel, NJ 08054

Plaintiff,

vs.

FAWN BELL
764 CURWENSVILLE GRAMPIAN
HWY
GRAMPIAN, PA 16838-7916
Defendant.

) COURT OF COMMON PLEAS
) CLEARFIELD COUNTY

) NO.: 2008-1238-CD

AMENDED COMPLAINT
FIRST COUNT

1. Plaintiff, PORTFOLIO RECOVERY ASSOCIATES, LLC, is a company with its principal place of business located at 140 Corporate Boulevard, Norfolk, Virginia 23502.
2. Defendant is FAWN BELL, an adult individual residing at 764 CURWENSVILLE GRAMPIAN HWY GRAMPIAN, PA 16838-7916.
3. Defendant applied for and received a credit card from WASHINGTON MUTUAL BANK account number 4479410625101394.
4. Defendant used the credit card, account number 4479410625101394, and as of October 21, 2008 there was an outstanding balance due and owing in the amount of \$4,919.80.
5. Plaintiff purchased this account and presently owns and holds this account.
6. When Plaintiff purchased this account there was an outstanding balance due and owing of \$4,919.80. Attached hereto as Exhibit "A" are the Statement and Copy of Payment.

3582

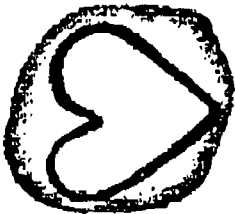
60-627-313

Date 19 Sept. 05

TIMOTHY L. BELL

FAWN R. BELL

764 CURWENSVILLE GRAMPIAN HWY.
GRAMPIAN, PA 15838



PAY TO
the ORDER of

One hundred, Eleven dollars & ⁰⁰/₁₀₀

\$ 111.00

COUNTY NATIONAL BANK

MAIN OFFICE
CLEARFIELD, PA

447941012801894

1:0313062781: 1"33007"5" 3582

PRINTED ON RECYCLED PAPER WITH 10% POST CONSUMER WASTE

XX

DETACH HERE

Your account is issued by Washington Mutual Bank, Henderson, NV.

Our File No.: 138138
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 Any pd. 20.00
M11:25:01
MAR 02 2009 ICC Notice to Def.
William A. Shaw
Prothonotary/Clerk of Courts
(610)

PORTFOLIO RECOVERY ASSOCIATES, LLC

Plaintiff,

vs.

FAWN BELL

Defendant.

) COURT OF COMMON PLEAS OF
) CLEARFIELD COUNTY

) NO.: 2008-1238-CD

) Civil Action

PRAECIPE FOR DEFAULT JUDGMENT

TO THE PROTHONOTARY:

Kindly enter judgment against Defendant, FAWN BELL, in the default of an Answer, in the amount of

\$5,243.66 computed as follows:

Amount claimed in complaint:	\$4,919.80
Amount Paid:	- \$(0.00)
Interest from June 30, 2008 to 2/24/2009 at the legal interest rate of 6.000 per annum	\$172.78
Cests	\$151.08
Attorney fees	\$0.00
TOTAL	\$5,243.66

I hereby certify that the appropriate Notices of Default, as attached have been mailed in accordance with Pa.R.Civ.P. 237.1 on the dates indicated on the Notices.

I certify that Plaintiff's address as PORTFOLIO RECOVERY ASSOCIATES, LLC c/o Apothaker & Associates, P.C. 520 Fellowship Road C 306, Mount Laurel, NJ 08054 and that Defendant, FAWN BELL, last know address is 764 CURWENSVILLE GRAMPIAN HWY GRAMPIAN, PA 16838-7916.

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

By:

David J. Apothaker

Dated: 2/24/2009

COPY

OFFICE OF THE PROTHONOTARY
COURT OF COMMON PLEAS

TO: R DENNING GEARHART ESQ
207 EAST MARKET ST
CLEARFIELD, PA 16830

PORTFOLIO RECOVERY
ASSOCIATES, LLC

Plaintiff,

vs.

FAWN BELL

Defendant.

) COURT OF COMMON PLEAS OF
) CLEARFIELD COUNTY
)

) NG.: 2003-1238-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

Willie L. Shaw
BA 3/2/09

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.: 138138
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

PORTFOLIO RECOVERY)	COURT OF COMMON PLEAS OF
ASSOCIATES, LLC)	CLEARFIELD COUNTY
)	
Plaintiff,)	
vs.)	NO.: 2008-1238-CD
)	
FAWN BELL)	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 764 CURWENSVILLE GRAMPIAN HWY GRAMPIAN, PA 16838-7916.

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. Snavelly-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-24-2009 11:52:59



Military Status Report
Pursuant to the Servicemembers Civil Relief Act

◀ Last Name	First/Middle	Begin Date	Active Duty Status	Service/Agency
BELL	FAWN	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

PORTFOLIO RECOVERY ASSOCIATES, LLC

vs.

FAWN BELL

) COURT OF COMMON PLEAS
) CLEARFIELD COUNTY

)
) NO. 2008-1238-CD
)

To:

R DENNING GEARHART ESQ
207 EAST MARKET ST
CLEARFIELD, PA 16830

NOTICE, RULE 237.5**NOTICE OF PRAECIPE TO ENTER JUDGMENT BY DEFAULT**Date of Notice: February 3, 2009**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: 08-1238-CD

PORTFOLIO RECOVERY ASSOCIATES, LLC

VS

FAWN BELL

SERVICE # 1 OF 1

COMPLAINT

SERVE BY: 08/06/2008

HEARING:

PAGE: 104383

COPY

DEFENDANT: FAWN BELL

ADDRESS: 764 CURWENSVILLE GRAMPIAN HWY.
GRAMPIAN, PA 16838

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

OCCUPIED

ATTEMPTS

7-21-08-2:24 PM N/A

SHERIFF'S RETURN

NOW 7-22-08 AT 2:08 AM ☒ PM SERVED THE WITHIN

COMPLAINT ON FAWN BELL, DEFENDANT

BY HANDING TO JESSICA BELL

Daughter

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

ADDRESS SERVED

764 Curwensville - Grampian Hwy.
Grampian, PA. 16838

NOW _____ AT _____ AM / PM POSTED THE WITHIN

COMPLAINT FOR FAWN BELL

AT (ADDRESS) _____

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

I MAKE RETURN OF **NOT FOUND** AS TO FAWN BELL

REASON UNABLE TO LOCATE _____

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