

08-1239-CD
LVNV Funding vs Lenetta Muirhead

162666

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

LVNV FUNDING, 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. 2008-1239-CD

Type of Case: CIVIL

Type of Pleading: PLEADING

VS.

Filed on Behalf of:

LENETTA MUIRHEAD

(Defendant)

183 OLD TURNPIKE RD

(Street Address)

MUNSON, PA 16860

(City, State, ZIP)

LVNV FUNDING,

LLC

(Plaintiff)

FILED

m 1:14pm SK
JUL 07 2008

ICC ATTY
1 COMP. SHFF.

William A. Shaw
Prothonotary/Clerk of Courts
ATTY PAID 95.00

David J. Apothaker, Esq.

Apothaker & Associates, P.C.

(Filed by)

2417 Welsh Road, Suite 21 #520

Philadelphia, PA 19114

(Address)

215 634-8920

(Phone)

I hereby certify this to be a true
and attested copy of the original
statement filed in this case.

JUL 07 2008

Attest.

William A. Shaw
Prothonotary/
Clerk of Courts

(Signature)

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

LVNV FUNDING, LLC
c/o Apothaker & Associates, P.C.
2417 Welsh Road, Suite 21 #520
Philadelphia, PA 19114
Plaintiff,

LENETTA MUIRHEAD
183 OLD TURNPIKE RD
MUNSON, PA 16860
Defendant.

) NO.:

1. Plaintiff is LVNV FUNDING, LLC c/o Apethaker & Associates, P.C., 2417 Welsh Road, Suite 21 #520, Philadelphia, PA 19114.
2. Defendant(s) is/are LENETTA MUIRHEAD, an adult individual residing at 183 OLD TURNPIKE RD MUNSON, PA 16860.
3. Plaintiff, LVNV FUNDING, LLC, is the Assignee and Successor in Interest of Account #5121071816363539; and said account was issued to Defendant(s) by SEARS, 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 \$21,007.74. 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 \$21,007.74 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: _____

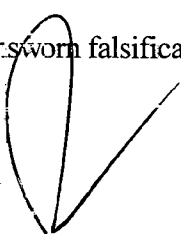
David J. Apothaker

Dated: 6/26/2008

Our File No.: 162666

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: 6/26/2008

LVNV FUNDING, LLC

LENETTA MUIRHEAD
183 OLD TURNPIKE RD
MUNSON, PA 16860

STATEMENT OF ACCOUNT

Debtor's Name:	LENETTA MUIRHEAD
Account Number:	5121071816363539
Original Creditor:	SEARS
Balance Due:	\$21,007.74

Our File No.: 162666

EXHIBIT "A"

**SHERIFF'S OFFICE
CLEARFIELD COUNTY
CASE # 104384**

DEAR LENETTA MUIRHEAD

Would you please contact the Sheriff's Office EXTENSION **1360** concerning legal papers we have for you

When you call, please give your name and the case # noted above (**104384**) and someone in the Office will be able to help you.

Thank you for your consideration in this matter.

SHERIFF CHESTER A. HAWKINS

OFFICE HOURS: 8:30 A.M. to 4:00 P.M.
PHONE (814) 765-2641

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-1239-CD

LVNV FUNDING LLC
vs
LENETTA MUIRHEAD

SERVICE # 1 OF 1

COMPLAINT

SERVE BY: 08/06/2008 HEARING: PAGE: 104384

DEFENDANT: LENETTA MUIRHEAD
ADDRESS: 183 OLD TURNPIKE RD
MUNSON, PA 16860

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT

ATTEMPTS

Nursing Home

FILED

JUL 15 2008

William A. Shaw
Prothonotary/Clerk of Courts

OCCUPIED

SHERIFF'S RETURN

NOW, _____ AT _____ AM / PM **SERVED** THE WITHIN

COMPLAINT ON LENETTA MUIRHEAD, DEFENDANT

BY HANDING TO _____ / _____

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

ADDRESS SERVED _____

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

COMPLAINT FOR LENETTA MUIRHEAD

AT (ADDRESS) _____

NOW 15th day of July 2008 AT 3:35 AM (PM) AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF **NOT FOUND** AS TO LENETTA MUIRHEAD

REASON UNABLE TO LOCATE IN A NURSING HOME UNKNOWN

SWORN TO BEFORE ME THIS

15th DAY OF July 2008

William A. Shaw cm

So Answers: CHESTER A. HAWKINS, SHERIFF

BY: Dep. George F. DeHaven
Deputy Signature

Dep. George F. DeHaven
Print Deputy Name

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2010
Clearfield Co., Clearfield, PA

162666

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

LVNV FUNDING, 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. 2008-1239-CD

Type of Case: CIVIL

Type of Pleading: PLEADING

VS.

Filed on Behalf of:

LENETTA MUIRHEAD

(Defendant)

183 OLD TURNPIKE RD

(Street Address)

MUNSON, PA 16860

(City, State, ZIP)

LVNV FUNDING,

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)

I hereby certify this to be a true
and attested copy of the original
statement filed in this case.

(Signature)

JUL 07 2008

Attest.

William A. Shaw
Prothonotary/
Clerk of Courts

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

LVNV FUNDING, LLC
c/o Apothaker & Associates, P.C.
2417 Welsh Road, Suite 21 #520
Philadelphia, PA 19114
Plaintiff,

vs.

LENETTA MUIRHEAD
183 OLD TURNPIKE RD
MUNSON, PA 16860
Defendant.

) COURT OF COMMON PLEAS
) CLEARFIELD COUNTY
)
) NO.:

CIVIL ACTION COMPLAINT
FIRST COUNT

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

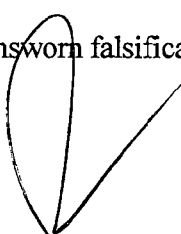
BY: _____
David J. Apothaker

Dated: 6/26/2008

Our File No.: 162666

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: 6/26/2008

LVNV FUNDING, LLC

LENETTA MUIRHEAD
183 OLD TURNPIKE RD
MUNSON, PA 16860

STATEMENT OF ACCOUNT

Debtor's Name:	LENETTA MUIRHEAD
Account Number:	5121071816363539
Original Creditor:	SEARS
Balance Due:	\$21,007.74

Our File No.: 162666

EXHIBIT "A"

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104384
NO: 08-1239-CD
SERVICES 1
COMPLAINT

PLAINTIFF: LVNV FUNDING LLC
vs.
DEFENDANT: LENETTA MUIRHEAD

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	APOTHAKE	96138	10.00
SHERIFF HAWKINS	APOTHAKE	96138	33.89

⁵
FILED
0/3:40 LM
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.: 162666
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

LVNV FUNDING, LLC

Plaintiff,

vs.

LENETTA MUIRHEAD

Defendant.

) COURT OF COMMON PLEAS
) CLEARFIELD COUNTY
)
)
)
)
)
)
)

NO. 2008-1239-CD

FILED ICC ASH
m/11:50am Apothaker
JAN 12 2009
LM

PRAECIPE TO DISMISS WITHOUT PREJUDICE

William A. Shaw
Prothonotary/Clerk of Courts

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: 12/30/2008