

08-1257-CD
Arrow Financ. Vs Andrea Shirey

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

Arrow Financial Services,
LLC
(Plaintiff)

P.O. Box C3800
(Street Address)
Southeastern, PA 19398
(City, State ZIP)

CIVIL ACTION

No. 2008-1257-CD

Type of Case: Contract

Type of Pleading: Complaint

VS.

Andrea L. Shirey
(Defendant)

301 Ida Street
(Street Address)
Philipsburg, PA 16866-2729
(City, State ZIP)

Filed on Behalf of:

Arrow Financial Services, LLC
(Plaintiff)

David C. Jenkins
Attorney ID #85769

(Filed by)

Blatt, Hasenmiller, Leibske &
Moore, LLC
P.O. Box C3800
Southeastern, PA 19398
(Address)
800-850-1079 x 4151

(Phone)

(Signature)

FILED

11:39 p.m. 1CC Atty
JUL 10 2008 1COMPL. SHERIFF

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

Blatt, Hasenmiller, Leibske & Moore, LLC
David C. Jenkins
Attorney I.D. #85769
P.O. Box C3800
Southeastern, PA 19398
800-850-1079

Attorney for Plaintiff,
ARROW FINANCIAL SERVICES, LLC

ARROW FINANCIAL SERVICES, LLC
c/o Blatt, Hasenmiller, Leibske & Moore, LLC
P.O. Box C3800
Southeastern, PA 19398

Plaintiff,

vs.

ANDREA L SHIREY

301 IDA ST
PHILIPSBURG PA 16866-2729

Defendant(s).

IN THE COURT OF COMMON PLEAS
CLEARFIELD COUNTY, PA
CIVIL ACTION
No.

PRAECIPE TO ENTER APPEARANCE

TO THE PROTHONOTARY:

Kindly **ENTER** my appearance in the above-captioned matter on behalf of **PLAINTIFF**

ARROW FINANCIAL SERVICES, LLC.

Papers may be served at the address set forth below:

Blatt, Hasenmiller, Leibske & Moore, LLC
P.O. Box C3800
Southeastern, PA 19398

Telephone Number: 1-800-850-1079 ext. 4151

**BLATT, HASENMILLER, LEIBSKER
& MOORE, LLC**

Dated: July 2, 2008

By:

David C. Jenkins

Blatt, Hasenmiller, Leibske & Moore, LLC
David C. Jenkins
Attorney I.D. #85769
P.O. Box C3800
Southeastern, PA 19398
800-850-1079

Attorney for Plaintiff,
ARROW FINANCIAL SERVICES, LLC

ARROW FINANCIAL SERVICES, LLC
c/o Blatt, Hasenmiller, Leibske & Moore, LLC
P.O. Box C3800
Southeastern, PA 19398

Plaintiff,

vs.

ANDREA L SHIREY
301 IDA ST
PHILIPSBURG PA 16866-2729

Defendant(s).

IN THE COURT OF COMMON PLEAS
CLEARFIELD COUNTY, PA
CIVIL ACTION

No.

NOTICE TO DEFEND

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, 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.

LAWYER REFERRAL SERVICE
PENNSYLVANIA COUNTY BAR ASSOCIATION
100 SOUTH ST.
P.O. BOX 1865
HARRISBURG, PA 17108
1-800-692-7375

Blatt, Hasenmiller, Leibske & Moore, LLC
David C. Jenkins
Attorney I.D. #85769
P.O. Box C3800
Southeastern, PA 19398
800-850-1079 ext. 4151

Attorney for Plaintiff,
ARROW FINANCIAL SERVICES, LLC

ARROW FINANCIAL SERVICES, LLC
c/o Blatt, Hasenmiller, Leibske & Moore, LLC
P.O. Box C3800
Southeastern, PA 19398

Plaintiff,
vs.
ANDREA L SHIREY
301 IDA ST
PHILIPSBURG PA 16866-2729

Defendant(s).

IN THE COURT OF COMMON PLEAS
CLEARFIELD COUNTY, PA
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No.

COMPLAINT

AND NOW comes Plaintiff, by its undersigned attorney, and complains against Defendant as follows:

1. The Plaintiff herein is ARROW FINANCIAL SERVICES, LLC, which has retained the services of Blatt, Hasenmiller, Leibske & Moore, LLC located at P.O. Box C3800, Southeastern, PA 19398.
2. The Defendant is/are ANDREA L SHIREY , whose last known principle residence is believed to be 301 IDA ST , PHILIPSBURG PA 16866-2729.
3. Defendant obtained extensions of credit on the following open-ended credit account issued by Plaintiff being known as Account Number 409132545 (henceforth "Account").
4. An extension of credit was made by Plaintiff to Defendant in reliance of the representation of Defendant for repayment of any outstanding balance on the Account.
5. At all relevant times material hereto, Defendant has/have used the Account for the purchase of goods and/or services.

6 The amount currently due and owing on the said Account is \$9032.74, plus interest and costs associated with the Account. An affidavit of a representative of Plaintiff is attached hereto as plaintiff's Exhibit "A" and is incorporated herein by reference.

7. Despite reasonable and repeated demands for payments on the Account prior to filing this complaint, Defendant has/have refused to pay all sums due and owing on the Account.

COUNT I - BREACH OF CONTRACT

8. Plaintiff incorporates the foregoing paragraphs by reference thereto.
9. Plaintiff has performed any and all conditions precedent to the bringing of this action.
10. Defendant is/are in breach of the agreement to repay the outstanding balance on the Account.

WHEREFORE, Plaintiff demands judgment in its favor against Defendant in the amount of \$9032.74, plus interest at the legal rate from the date of judgment plus costs and any other remedy which this Court may deem just and proper.

COUNT II - ACCOUNTS STATED

11. Plaintiff incorporates the foregoing paragraphs by reference thereto.
12. Periodic billing statements on the Account were sent by Plaintiff to Defendant by mail on a regular basis.
13. Defendant was given reasonable opportunity to examine each of the said billing statements and did not communicate any dispute of the charges to the Plaintiff.
14. The failure of Defendant to dispute the periodic billing statements constitutes an acceptance of the balance due on the Account.

WHEREFORE, Plaintiff demands judgment in its favor against Defendant in the amount of \$9032.74, plus interest at the legal rate from the date of judgment plus costs and any other remedy which this Court may deem just and proper.

COUNT III - UNJUST ENRICHMENT

15. Plaintiff incorporates the foregoing paragraphs by reference thereto.
16. As a direct result of the receipt of the benefit of the extensions of credit given on the Account by the Plaintiff to the Defendant, Defendant has/have been unjustly enriched in the amount of \$9032.74 to the detriment of the Plaintiff.

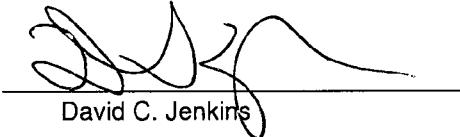
WHEREFORE, Plaintiff demands judgment in its favor against Defendant in the amount of \$9032.74, plus interest at the legal rate from the date of judgment plus costs and any other remedy which this Court may deem just and proper.

Respectfully submitted,

**BLATT, HASENMILLER, LEIBSKER
& MOORE, LLC**

Dated: July 2, 2008

By:

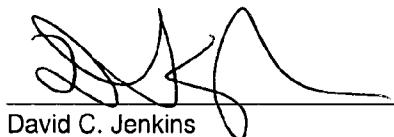


David C. Jenkins

VERIFICATION

I, DAVID C. JENKINS, the undersigned attorney for the Plaintiff, hereby verify that the statements made in the foregoing Complaint are true and correct to the best of my knowledge, information, and belief, based upon information provided by the Plaintiff, that the Plaintiff is presently located outside of this jurisdiction, and that in order to file the within document in an expedient and timely manner I am authorized to sign this verification on behalf of the Plaintiff.

I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsifications to authorities.



David C. Jenkins
Attorney for Plaintiff

Exhibit "A"

STATE OF ILLINOIS
COUNTY OF COOK

AFFIDAVIT OF INDEBTEDNESS

The undersigned, being duly sworn, deposes and states that he/she is an employee/agent of: Arrow Financial Services, LLC and has knowledge of the account balance, and is duly authorized to make this affidavit.

Affiant states that the amounts shown below are taken/calculated from the original books and records of the above named plaintiff as well as from information provided to Arrow Financial Services, LLC by AMERICREDIT FINANCIAL SERVICES, INC., and based on information and belief, affiant states that the amount due to Arrow Financial Services, LLC by ANDREA L SHIREY

for funds advanced to defendant(s) or paid to another at defendant(s) request, or for goods or services provided to defendant(s) or to another at defendant's request, is the following on the following account(s) as of 06-03-08:

CREDITOR/ACCOUNT NUMBER	CURRENT BALANCE
Arrow Financial Services, LLC 409132545	\$9032.74

Affiant states that the amount shown above is true and correct to the best of his/her knowledge. Further affiant sayeth not.

Subscribed and Sworn to Before me

18 day of June, 2008.
Erica Martinez
Notary Public
My Commission Expires: 8/23/2010

Patricia Wallace
Affiant
Legal Clerk
Title

Date of Service: / /20

Reference #: 2103728
Forwarder ID#:
Account #: 409132545

BAFFAFSL(11/02)CF3
ARROW FINANCIAL SERVICES LLC



**Search**You are here: [Main](#) ▶ [Search](#) ▶ [Advanced Geography Search](#)[general search](#) [keyword](#) [geography](#)

Choose a geography selection method

[list](#) [name search](#) [address search](#) [map](#)**■ Select a year and program** **■ Enter a street address, city and state, or a street address and ZIP code. Click 'Go'**Street Address [Quick tips](#)City State ZIP Code **■ Geographies containing 301 Ida St , Philipsburg , Pennsylvania, 16866:**

Select a geography and click 'OK'

State: Pennsylvania
... County: Clearfield County
... ... County Subdivision: Chester Hill borough
... ... Census Tract: Census Tract 3309
... Block Group: Block Group 3
... Block: Block 3033
... Voting District/Remainder: CHESTER HILL Voting District
... Place: Chester Hill borough

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
NO: 08-1257-CD

ARROW FINANCIAL SERVICES, LLC

VS

ANDREA L. SHIREY

SERVICE # 1 OF 1

COMPLAINT

SERVE BY: 08/09/2008 HEARING: PAGE: 104392

DEFENDANT: ANDREA L. SHIREY
ADDRESS: 301 IDA ST.
PHILIPSBURG, PA 16866

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

OCCUPIED

ATTEMPTS

7/8/08 Lp

FILED

01/00/08

JUL 21 2008

William A. Shaw
Prothonotary/Clerk of Courts

SHERIFF'S RETURN

NOW, 21st Day of July, 2008 AT 12:53 AM / PM SERVED THE WITHIN
COMPLAINT ON ANDREA L. SHIREY, DEFENDANT

BY HANDING TO ANDREA L. SHIREY 1 DEF

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

ADDRESS SERVED 11-2nd ST CLEARFIELD, PA 16830

NOW _____ AT _____ AM / PM POSTED THE WITHIN

COMPLAINT FOR ANDREA L. SHIREY

AT (ADDRESS) _____

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

I MAKE RETURN OF **NOT FOUND** AS TO ANDREA L. SHIREY

REASON UNABLE TO LOCATE _____

SWORN TO BEFORE ME THIS

DAY OF _____ 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

Chester A. Hawkins
Deputy Signature

CHESTER A. HAWKINS
Print Deputy Name

FILED

JUL 21 2008

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104392
NO: 08-1257-CD
SERVICES 1
COMPLAINT

PLAINTIFF: ARROW FINANCIAL SERVICES, LLC
vs.
DEFENDANT: ANDREA L. SHIREY

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	BLATT	11907	10.00
SHERIFF HAWKINS	BLATT	11907	38.14

S
FILED
03:40PM
OCT 13 2008
LAW

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

So Answers,

____ Day of _____ 2008

Chester A. Hawkins

Chester A. Hawkins
Sheriff

FILED

OCT 13 2008

William A. Shaw
Prothonotary/Clerk of Courts

Blatt, Hasenmiller, Leibske & Moore, LLC
Daniel Santucci
Attorney I.D. #92800
5 Great Valley Parkway, Suite 100
Malvern, PA 19355
800-850-1079 ext. 4151

Attorney for Plaintiff,
ARROW FINANCIAL SERVICES, LLC

ARROW FINANCIAL SERVICES, LLC
c/o Blatt, Hasenmiller, Leibske & Moore, LLC
5 Great Valley Parkway, Suite 100
Malvern, PA 19355
Plaintiff,
vs.
ANDREA L SHIREY
301 IDA ST
PHILIPSBURG PA 16866-2729
Defendant(s).

IN THE COURT OF COMMON PLEAS
CLEARFIELD COUNTY, PA
CIVIL ACTION
No. 2008-1257-CD

**PRAEICE FOR ENTRY OF JUDGMENT BY DEFAULT
FOR FAILURE TO PLEAD**

TO THE PROTHONOTARY:

Kindly **ENTER** a **JUDGMENT BY DEFAULT FOR FAILURE TO PLEAD** against the
DEFENDANT **ANDREA L SHIREY** in this matter in the amount of \$9032.74 plus court costs.

I also hereby certify that a true and correct copy of the Notice required by Pa.R.C.P.
237.1(a)(2) was mailed separately to each defendant on 3-18-09 by regular mail. A true and
correct copy of each Notice is attached hereto.

Respectfully submitted,

**BLATT, HASENMILLER, LEIBSKER
& MOORE, LLC**

By:

Daniel Santucci

Dated: April 2, 2009

2103728
PPTJPFJI



5/24/2009
FILED Atty pd. 20.00
APR 20 2009
CC & Notice
to Def.
William A. Shaw
Prothonotary/Clerk of Courts

Blatt, Hasenmiller, Leibske & Moore, LLC
Daniel Santucci
Attorney I.D. #92800
5 Great Valley Parkway, Suite 100
Malvern, PA 19355
800-850-1079

Attorney for Plaintiff,
ARROW FINANCIAL SERVICES, LLC

ARROW FINANCIAL SERVICES, LLC
c/o Blatt, Hasenmiller, Leibske & Moore, LLC
5 Great Valley Parkway, Suite 100
Malvern, PA 19355
Plaintiff,
vs.
ANDREA L SHIREY
301 IDA ST
PHILIPSBURG PA 16866-2729
Defendant(s).

IN THE COURT OF COMMON PLEAS
CLEARFIELD COUNTY, PA
CIVIL ACTION
No. 2008-1257-CD

AFFIDAVIT OF NON-MILITARY SERVICE

COMMONWEALTH OF PENNSYLVANIA: County of Chester:

I, Daniel Santucci, being duly sworn according to law, depose and say I am the attorney for Plaintiff and I am authorized to make this affidavit on Plaintiff's behalf. I hereby certify that the Defendant is at least 18 years of age and not in the Military Service of the United States, nor any State or Territory thereof or its allies as defined in the Soldiers' and Sailors' Civil Relief Act of 1940 and any amendments thereto.

I also hereby certify that the statements made in the foregoing Affidavit of Non-Military Service are true and correct to the best of my information, knowledge, and belief. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S.A. Section 4904 relating to unsworn falsification to authorities.

**BLATT, HASENMILLER, LEIBSKER
& MOORE, LLC**

By:

Daniel Santucci

Dated: April 2, 2009

2103728
PPTJCAMI



ARROW FINANCIAL SERVICES, LLC
Plaintiff,

vs.

ANDREA L SHIREY
301 IDA ST
PHILIPSBURG PA 16866-2729

Defendant(s).

IN THE COURT OF COMMON PLEAS

CLEARFIELD COUNTY, PA

CIVIL ACTION

No. 2008-1257-CD

TO: ANDREA L SHIREY

Date of Notice: March 18, 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.

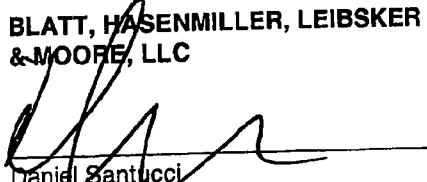
YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

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PENNSYLVANIA COUNTY BAR ASSOCIATION
100 SOUTH ST.
P.O. BOX 1865
HARRISBURG, PA 17108
1-800-692-7375

BLATT, HASENMILLER, LEIBSKER
& MOORE, LLC

By:


Daniel Santucci
5 Great Valley Parkway, Suite 100
Malvern, PA 19355
800-850-1079 x 4151

This is a communication from a debt collector. This is an attempt to collect a debt and any information obtained will be used for that purpose.

2103728
PPTNLRSI



ARROW FINANCIAL SERVICES, LLC
Plaintiff,
vs.
ANDREA L SHIREY
Defendant(s).

IN THE COURT OF COMMON PLEAS
CLEARFIELD COUNTY, PA
CIVIL ACTION
No.
No. 2008-1257-CD

TO: ANDREA L SHIREY

NOTICE

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

PROTHONOTARY

Dated: 4/20/09

By: William H. Shan

IF YOU HAVE ANY QUESTIONS CONCERNING THE ABOVE, PLEASE CONTACT:

Attorney of Record for Plaintiff:

Blatt, Hasenmiller, Leibske & Moore, LLC
Daniel Santucci
Attorney I.D. #92800
P.O. Box C3800
Southeastern, PA 19398
800-850-1079

2103728
PPTNDJN1

