

08-1258-CD
Arrow Financ. Vs Michael Salovich

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. 2008-1258-CD

Type of Case: Contract

Type of Pleading: Complaint

VS.

Michael Salovich

(Defendant)

216 Creek Lane

(Street Address)

Cherry Tree, PA 15724-9654

(City, State ZIP)

Filed on Behalf of:

Arrow Financial Services, LLC

(Plaintiff)

**David C. Jenkins
Attorney ID #85769**

(Filed by)

**Blatt, Hasenmiller, Leibsker &
Moore, LLC**

P.O. Box C3800

Southeastern, PA 19398

(Address)

800-850-1079 x 4151

(Phone)

(Signature)

FILED

M 2:26 PM GK ICC Atty
JUL 10 2008 1 Compl. STFF.

William A. Shaw
Prothonotary/Clerk of Courts

Atty Paid 95.00

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

Plaintiff,

vs.

MICHAEL SALOVICH

216 CREEK LN
CHERRY TREE PA 15724-9654

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, Leibsker & 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

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c/o Blatt, Hasenmiller, Leibsker & Moore, LLC
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Defendant(s).

IN THE COURT OF COMMON PLEAS

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CIVIL ACTION

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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, Leibsker & Moore, LLC located at P.O. Box C3800, Southeastern, PA 19398.
2. The Defendant is/are MICHAEL SALOVICH , whose last known principle residence is believed to be 216 CREEK LN , CHERRY TREE PA 15724-9654.
3. Defendant obtained extensions of credit on the following open-ended credit account issued by Plaintiff being known as Account Number 0176631900700055 (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 \$10493.08, plus interest and costs associated with the Account. An affidavit of a representative of Plaintiff is attached herto 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 \$10493.08, 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 \$10493.08, 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 \$10493.08 to the detriment of the Plaintiff.

WHEREFORE, Plaintiff demands judgment in its favor against Defendant in the amount of \$10493.08, 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

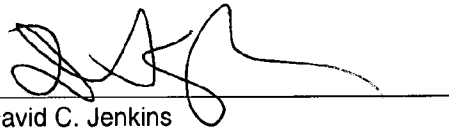
By: _____

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.

A handwritten signature in black ink, appearing to be 'D. C. Jenkins', is written over a horizontal line.

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
HSBC BANK NEVADA, N.A, and based on information and belief, affiant states that the amount
due to Arrow Financial Services, LLC by MICHAEL SALOVICH

for funds advanced to defendants(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 05-20-08:

CREDITOR/ACCOUNT NUMBER

CURRENT BALANCE

Arrow Financial Services, LLC
0176631900700055

\$10493.08

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
Lakisha Esco
Notary Public

My Commission Expires: 2/4/12

Heaven Izda
Affiant
Legal Clerk
Title

Date of Service: / / 20

Reference #: 2040084
Forwarder ID#:
Account #: 0176631900700055

BAFFAFSL(11/02)CF4
ARROW FINANCIAL SERVICES LLC



zipinfo.com

[Click here for our Product Catalog](#)

Search Results for ZIP code 15724

Data source: [ZIPList5](#) (July 2008)

maybe it's on the border between 2 counties.

Mailing Name	State	ZIP Code	County Name	FIPS Code
Cherry Tree	PA	15724	Indiana	42063

Are you looking for the ZIP code for a particular street address? If so, [click here](#).

Search Again...

For any valid ZIP code, find the city and state, plus:

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☐ time zone ☐ latitude and longitude
☐ MSA/PMSA

Enter a ZIP code or a city and state

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Voice: 800-571-3914 or 281-292-3270

Fax: 281-292-3608

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JUL 10 2008

**William A. Shaw
Prothonotary/Clerk of Courts**

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

Plaintiff,

vs.

MICHAEL SALOVICH

216 CREEK LN
CHERRY TREE PA 15724-9654

Defendant(s).

IN THE COURT OF COMMON PLEAS

CLEARFIELD COUNTY, PA

CIVIL ACTION

No. 2008-1258-CD

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, Leibsker & 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

2040084
PPTXPEAI

FILED

JUL 10 2008

William A. Shaw
Prothonotary/Clerk of Courts

1 CC Arty, SHFF.
(CK)

FILED

JUL 10 2008

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-1258-CD

ARROW FINANCIAL SERVICES, LLC

vs

MICHAEL SALOVICH

SERVICE # 1 OF 1

COMPLAINT

SERVE BY: 08/09/2008

HEARING:

PAGE: 104393

DEFENDANT: MICHAEL SALOVICH
ADDRESS: 216 CREEK LN
CHERRY TREE, PA 15724

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT OCCUPIED

ATTEMPTS

7-21-08-9:46 AM - N/H

SHERIFF'S RETURN

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

COMPLAINT ON MICHAEL SALOVICH, 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 MICHAEL SALOVICH

AT (ADDRESS) _____

NOW 7-24-08 AT 10:20 AM PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF **NOT FOUND** AS TO MICHAEL SALOVICH

REASON UNABLE TO LOCATE

According To P.O. Moved left No Forwarding Address

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

Blatt, Hasenmiller, Leibsker & 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

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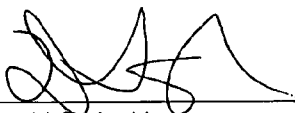
Blatt, Hasenmiller, Leibsker & Moore, LLC
P.O. Box C3800
Southeastern, PA 19398

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

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

Dated: July 2, 2008

By:


David C. Jenkins

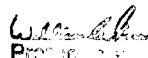
I hereby certify this to be a true
and attested copy of the original
statement filed in this case.

JUL 10 2008

2040084
PPTXPEAI

Attest.




Notary
Clearfield County, PA

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. 2008-1258-CD

Type of Case: Contract

Type of Pleading: Complaint

VS.

Michael Salovich

(Defendant)

216 Creek Lane

(Street Address)

Cherry Tree, PA 15724-9654

(City, State ZIP)

Filed on Behalf of:

Arrow Financial Services, LLC

(Plaintiff)

David C. Jenkins

Attorney ID #85769

(Filed by)

**Blatt, Hasenmiller, Leibsker &
Moore, LLC**

P.O. Box C3800

Southeastern, PA 19398

(Address)

800-850-1079 x 4151

(Phone)

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

JUL 10 2008

Attest.

William A. Brown
Prothonotary/
Clerk of Courts

(Signature)