

08-1288-CD

Crown Asset Manage. vs S. Rowles

136944

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

CROWN ASSET MANAGEMENT, 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. 08-1288-CD

Type of Case: CIVIL

Type of Pleading: PLEADING

VS.

Filed on Behalf of:

SHELBY L ROWLES

(Defendant)

685 WM CEMETERY RD

(Street Address)

CURWENSVILLE, PA 16833

(City, State, ZIP)

CROWN ASSET MANAGEMENT,

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)

**FILED** Aug pd. \$95.00

M/11:41/20  
JUL 14 2008

ICC Sheriff

William A. Shaw

Prothonotary/Clerk of Courts

ICC Atty

(Signature)

Our File No.: 136944  
APOTHAKER & 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

CROWN ASSET MANAGEMENT, LLC	)	COURT OF COMMON PLEAS
c/o Apothaker & Associates, P.C.	)	CLEARFIELD COUNTY
2417 Welsh Road, Suite 21 #520	)	
Philadelphia, PA 19114	)	NO.:
Plaintiff,	)	
vs.	)	
	)	
SHELBY L ROWLES	)	
685 WM CEMETERY RD	)	
CURWENSVILLE, PA 16833	)	
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

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

CROWN ASSET MANAGEMENT, LLC	)	COURT OF COMMON PLEAS
c/o Apothaker & Associates, P.C.	)	CLEARFIELD COUNTY
2417 Welsh Road, Suite 21 #520	)	
Philadelphia, PA 19114	)	NO.:
Plaintiff,	)	
vs.	)	
	)	
SHELBY L ROWLES	)	
685 WM CEMETERY RD	)	
CURWENSVILLE, PA 16833	)	
Defendant.	)	
	)	

CIVIL ACTION COMPLAINT  
**FIRST COUNT**

1. Plaintiff is CROWN ASSET MANAGEMENT, LLC c/o Apothaker & Associates, P.C., 2417 Welsh Road, Suite 21 #520, Philadelphia, PA 19114.
2. Defendant(s) is/are SHELBY L ROWLES, an adult individual residing at 685 WM CEMETERY RD CURWENSVILLE, PA 16833.
3. Plaintiff, CROWN ASSET MANAGEMENT, LLC, is the Assignee and Successor in Interest of Account #4046770144355845; and said account was issued to Defendant(s) by FIRST NATIONAL BANK OF OMAHA, 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 \$1,157.24. 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 \$1,157.24 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

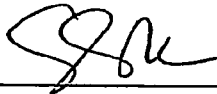
BY: \_\_\_\_\_  
David J. Apothaker

Dated: 7/7/2008

Our File No.: 136944

**VERIFICATION**

SUSAN SHUPLOCK hereby states that I am 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.



DATE:

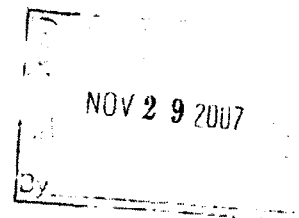
**FILED**

**JUL 14 2008**

William A. Shaw  
Prothonotary/Clerk of Courts

136 944

# Crown Asset Management, LLC Statement of Account



Crown File Number:	402569
Primary Debtor Name:	ROWLES, SHELBY L
Primary Debtor Home Address:	685 WM CEMETERY RD
Additional Debtor Name:	CURWENSVILLE, PA 16833
Original Lender:	First National Bank of Omaha
Original Lender Account Number:	4046770144355845
Alternate Lender Account Number:	4046770144355845
Account Open Date:	06/01/2002
Original Lender Charge-off Date:	02/25/2005
Date of Last Payment to Original Lender:	08/27/2004
Date of Last Payment to Crown Asset Management, LLC:	
Account Purchase Date by Crown Asset Management, LLC:	06/26/2007
Principal Balance Due:	\$ 1,111.38
Interest Amount Due:	\$ 0.00
Total Amount Due:	\$ 1,111.38

NOTE: Crown Asset Management, LLC created this statement using data provided by the original creditor or prior owners of the account and does not intend to imply that the originating creditor participated in the creation of this statement.

**FILED**

**JUL 14 2008**

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-1288-CD

CROWN ASSET MANAGEMENT, LLC

VS

SHELBY L. ROWLES

SERVICE # 1 OF 1

COMPLAINT

SERVE BY: 08/13/2008

HEARING:

PAGE: 104413

DEFENDANT: SHELBY L. ROWLES  
ADDRESS: 685 WM. CEMETERY RD.  
CURWENSVILLE, PA 16833

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

OCCUPIED

ATTEMPTS

7/18/08 NH

**SHERIFF'S RETURN**

NOW, 7-21-08 AT 2:01 AM/PM SERVED THE WITHIN

COMPLAINT ON SHELBY L. ROWLES, DEFENDANT

BY HANDING TO Shelby L. Rowles, Def.

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

ADDRESS SERVED 685 Wm. Cemetery Rd.  
Curwensville, Pa. 16833

NOW \_\_\_\_\_ AT \_\_\_\_\_ AM / PM POSTED THE WITHIN

COMPLAINT FOR SHELBY L. ROWLES

AT (ADDRESS) \_\_\_\_\_

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

I MAKE RETURN OF **NOT FOUND** AS TO SHELBY L. ROWLES

REASON UNABLE TO LOCATE \_\_\_\_\_

SWORN TO BEFORE ME THIS

\_\_\_\_\_ DAY OF \_\_\_\_\_ 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

*Dominic Morgillo*  
Deputy Signature

Dominic L. Morgillo  
Print Deputy Name

FILED

013:39/04  
JUL 21 2008

William A. Shaw  
Prothonotary/Clerk of Courts

FILED

JUL 21 2008

William A. Shaw  
Prothonotary/Clerk of Courts

Our file No.: 136944  
APOTHAKE & ASSOCIATES, P.C.  
2417 Welsh Road, Suite 21 #520  
Philadelphia, PA 19114  
(215) 634-8920  
Attorneys for Plaintiff  
Attorney ID# 55140

**FILED** *NO CC*  
*m/12:40/30*  
SEP 15 2008 *GD*

William A. Shaw  
Prothonotary/Clerk of Courts

<hr/>		) COURT OF COMMON PLEAS
CROWN ASSET MANAGEMENT, LLC		) CLEARFIELD COUNTY
		)
Plaintiff,		) DOCKET NO.: 08-1288-CD
vs.		)
SHELBY L ROWLES		) Civil Action
		)
Defendant.		) STIPULATION IN LIEU OF JUDGMENT
<hr/>		)

The matters and things in controversy having been discussed by and between the parties, and a settlement having been agreed upon:

It is on August 14, 2008, STIPULATED by and between Plaintiff, CROWN ASSET MANAGEMENT, LLC, and Defendant, SHELBY L ROWLES parties as follows:

1. Defendant agrees to pay the sum of \$951.00, which sum Plaintiff agrees to accept in full settlement of its claim herein, inclusive of counsel fees and court costs.
2. The sum aforesaid shall be paid by Defendant, SHELBY L ROWLES, to the attorneys for Plaintiff in the following manner:
  - a. Payment of \$317.00 to be paid on or before August 22, 2008;
  - b. Payment of \$317.00 to be paid on or before September 5, 2008;
  - c. Payment of \$317.00 to be paid on or before September 19, 2008.

All checks are to made payable to CROWN ASSET MANAGEMENT, LLC, and sent to:

Apothaker & Associates, P.C.  
520 Fellowship Road C306  
Mount Laurel, NJ 08054

3. In the event Defendant fails to pay in accordance with the terms set forth in this Stipulation, then, and in that event, Plaintiff shall be entitled to obtain the entry of

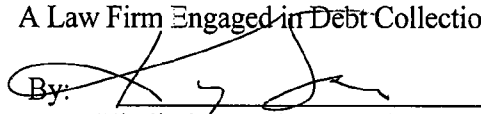
136944

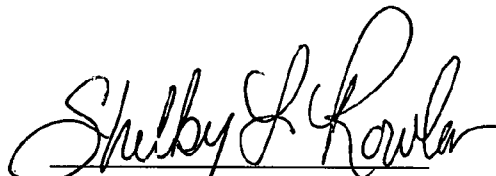
Judgment against Defendant *ex parte*, in the sum of \$1,359.18, giving Defendant credit for any sums actually paid pursuant to the terms of this Stipulation.

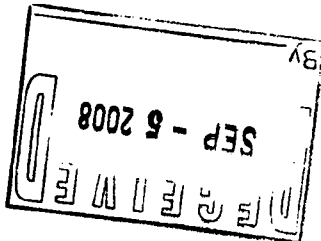
4. In the event of default as aforesaid, and default is not cured within ten (10) days, Plaintiff shall be entitled to obtain the entry of Judgment upon *ex parte* application, with supporting certification, and with notice to Defendant only in the form of a copy of the application addressed to SHELBY L ROWLES by first-class, postage prepaid.

We hereby consent to the form and entry of the within Stipulation.

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

By:   
Kimberly F. Scian, Esquire

  
SHELBY L ROWLES



FILED

SEP 15 2008

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104413  
NO: 08-1288-CD  
SERVICES 1  
COMPLAINT

PLAINTIFF: CROWN ASSET MANAGEMENT, LLC  
vs.  
DEFENDANT: SHELBY L. ROWLES

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	APOTHAKE	97435	10.00
SHERIFF HAWKINS	APOTHAKE	97435	32.04

4  
**FILED**  
013110811  
OCT 15 2008  
William A. Shaw  
Prothonotary/Clerk of Courts

Sworn to Before Me This

\_\_\_\_\_ Day of \_\_\_\_\_ 2008

So Answers,



Chester A. Hawkins  
Sheriff

**FILED**  
**OCT 15 2008**

William A. Shaw  
Prothonotary/Clerk of Courts

Our File No.: 136944  
APOTHAKER & ASSOCIATES, P.C.  
BY: Kimberly F. Scian, Esquire  
Attorney I.D.# 55140  
520 Fellowship Road C306  
Mount Laurel, NJ 08054  
(800) 672-0215  
Attorney for Plaintiff

**FILED**  
FEB 19 2009  
in/4:00/AM  
William A. Shaw  
Prothonotary/Clerk of Courts  
2 Cont to App

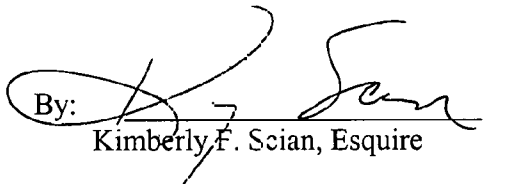
CROWN ASSET MANAGEMENT, LLC	)	COURT OF COMMON PLEAS
	)	CLEARFIELD COUNTY
	)	
Plaintiff,	)	
vs.	)	
	)	NO. 08-1288-CD
SHELBY L ROWLES	)	
	)	
	)	
Defendant.	)	

**PRAECIPE TO DISMISS WITHOUT PREJUDICE**

TO THE PROTHONOTARY:

Kindly dismiss this action without prejudice.

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

By:   
Kimberly F. Scian, Esquire

Dated: February 13, 2009

FILED  
FEB 19 2009  
William A. Stebbins  
Prothonotary/Clerk of Courts