

08-1357-CD

Arrow Fin. Al vs Rebecca L. Horchen

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

ARROW FINANCIAL SERVICES, LLC ASSIGNEE OF
WASHINGTON MUTUAL BANK No. 2008-1357-CD

C/O Mann Bracken LLC
4660 TRINDLE ROAD, SUITE 300
CAMP HILL, PA 17011

Plaintiff

Type of Case: Contract

VS.

Type of Pleading:

REBECCA L HORCHEN
130 E LONG AVE
DU BOIS PA 15801

Filed on Behalf of: Plaintiff

Defendant(s)

Date: 7/19/08


Amy F. Doyle #87062 / Philip C. Warholic #86341 /
David R. Galloway #87326 / Sarah E. Ehasz #86469 /
Robert N. Polas, Jr. #201259
Mann Bracken LLC
The Successor by Merger to Wolpoff & Abramson, L.L.P.
and Eskanos & Adler, P.C.
4660 Trindle Road, Suite 300, Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

FILED

IN 2:25PM 6K
JUL 24 2008

1CC AITY
1 COMPL. SHFF,

William A. Shaw
Prothonotary/Clerk of Courts *WAS* AMY PAID 95.00

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

ARROW FINANCIAL SERVICES, LLC
ASSIGNEE OF WASHINGTON MUTUAL BANK
Plaintiff

VS

REBECCA L HORCHEN
Defendant(s)

: No.

CIVIL ACTION - LAW

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 an 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 or any other claim or relief requested by the Plaintiff. You may lose money or property 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 HELP. 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.

Clearfield County Courthouse
David S. Meholick, Court Administrator 230 East Market Street
Clearfield, PA 16830
814-765-2641

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

ARROW FINANCIAL SERVICES, LLC
ASSIGNEE OF WASHINGTON MUTUAL BANK
Plaintiff

: No.

: vs

: CIVIL ACTION - LAW

REBECCA L HORCHEN
Defendant(s)

NOTICIA

USTED HA SIDO DEMANDADO/A EN LA CORTE. Si usted desea defender conta la demanda puestas en las siguientes paginas, usted tienen que tomar acción dentro veinte (20) dias después que esta Demanda y Aviso es servido, con entrando por escrito una apariencia personalmente o por un abogado y archivando por escrito con la Corte sus defensas o objeciones a las demandas puestas en esta contra usted. Usted es advertido que si falla de hacerlo el caso puede proceder sin usted y un juzgamiento puede ser entrado conta usted por la Corte sin mas aviso por cualquier dinero reclamado en la Demanda o por cualquier otro reclamo o alivio solicitado por Demandante. Usted puede perder dinero o propiedad o otros derechos importante para usted.

USTED DEBE LLEVAR ESTE PAPEL A SU ABOGADO ENSEGUIDA. SI USTED NO TIENE UN ABOGADO, VAYA O LLAME POR TELEFONO LA OFICINA FIJADA AQUI ABAJO. ESTA OFICINA PUEDE PROVEERE CON INFORMACION DE COMO CONSEGUIR UN ABOGADO.

SI USTED NO PUEDE PAGARLE A UN ABOGADO, ESTA OFICINA PUEDE PROVEERE INFORMACION ACERCA AGENCIAS. QUE PUEDAN OFRECER SERVICIOS LEGAL A PERSONAS ELIGIBLE AQ UN HONORARIO REDUCIDO O GRATIS.

Clearfield County Courthouse
David S. Meholic, Court Administrator 230 East Market Street
Clearfield, PA 16830
814-765-2641

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

ARROW FINANCIAL SERVICES, LLC
ASSIGNEE OF WASHINGTON MUTUAL BANK
Plaintiff

: No.

vs

: CIVIL ACTION - LAW

REBECCA L HORCHEN
Defendant(s)

COMPLAINT

AND NOW, comes the Plaintiff, by and through its attorneys and the law firm of Mann Bracken LLC, and files this Complaint and in support avers as follows:

1. Plaintiff is ARROW FINANCIAL SERVICES, LLC ASSIGNEE OF WASHINGTON MUTUAL BANK , located at 5996 W. Touhy Avenue Niles, IL 60714.
2. Defendant, REBECCA L HORCHEN, is an adult individual with a last known address of 130 E Long Ave Du Bois, Clearfield County, PA 15801.
3. It is averred that Defendant was issued an open end credit card account.
4. At all relevant times material hereto, Defendant has used said charge card for the purchase of products, goods and/or for obtaining services.

5. Defendant was provided with copies of the Statement of Accounts showing all debits and credits for transactions on the aforementioned credit card account to which there was no bona fide objection by Defendant. A true and correct copy of the Statement of Account is attached hereto, incorporated herein and marked as Exhibit "A".

6. As of the date of this Complaint, the remaining balance due, owing and unpaid on Defendant's credit card account as a result of the charges made by said Defendant and/or any authorized users is the sum of \$14,992.25.

7. Despite reasonable and repeated demands for payment, Defendant has refused and continues to refuse to pay all sums due and owing on the aforementioned account balance, all to the damage and detriment of the Plaintiff.

8. The amount in controversy is within the jurisdictional amount requiring compulsory arbitration.

WHEREFORE, Plaintiff respectfully requests this Honorable Court enter Judgment in favor of the Plaintiff and against Defendant(s) in the amount of \$14,992.25, plus costs of this action and any other relief as this Court deems just and reasonable.

Respectfully Submitted,

Date: 7/19/08


Amy F. Doyle #87062 / Philip C. Warholic #86341 /
David R. Galloway #87326 / Sarah E. Ehasz #86469 /
Robert N. Polas, Jr. #201259

Mann Bracken LLC

The Successor by Merger to Wolpoff & Abramson, L.L.P.
and Eskanos & Adler, P.C.

4660 Trindle Road, Suite 300, Camp Hill, PA 17011

Telephone: (717) 303-6700

Counsel for Plaintiff

VERIFICATION

The undersigned hereby states that they are the attorney for the Plaintiff who is located outside of this jurisdiction and in order to file the within document in an expedient and timely manner, they are authorized to take this verification on behalf of said Plaintiff in the within action and verifies that the statements made in the foregoing Pleading are true and correct to the best of their knowledge, information, and belief, based upon information provided by the Plaintiff.

The undersigned understands that false statements herein are made subject to the penalties of 18 Pa.C.S. Section 4904, relating to unsworn falsification to authorities.

Date: 7/19/08

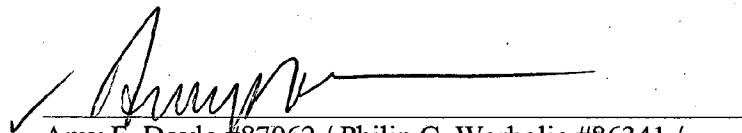

Amy F. Doyle #87062 / Philip C. Warholic #86341 /
David R. Galloway #87326 / Sarah E. Ehasz #86469 /
Robert N. Polas, Jr. #201259
Mann Bracken LLC
The Successor by Merger to Wolpoff & Abramson, L.L.P.
and Eskanos & Adler, P.C.
4660 Trindle Road, Suite 300, Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

Exhibit "A"

••FICHINFO1 •• Date 04/02/08 Account 9959 Mode L ••Nxt + •

ACCOUNT# 2818 CLIENT# 001744

CLIENT NAME ARROW FINANCIAL SERVICES

OPEN DATE 05/26/1998

LAST PAYMENT DATE 06/07/2006

CHARGE-OFF DATE 11/30/2006

SERVICE DATE 07/19/2006

INITIAL BALANCE 00012146.85 CURRENT BALANCE 00014992.25

CL INT ACCT # ISSUER

6607W WASHINGTON MUTUAL BANK

*** ARROW IT MISC WAMU PROVIDIAN CCCS LITE

*WW-PRNCPL-BAL *WW-INTRST-BAL *WW-MISC-BAL-3 *WW-MISC-BAL-4

00012146.85 00000000.00 00000000.00 00000000.00

** OTHER BALANCES **

*WW-AFS-INTRST *WW-COURT-COST *WW-ATTY-FEE *WW-POST-JUDG *WW-AFS-MISC-1

00002845.40 00000000.00 00000000.00 00000000.00 00000000.00

** WW-RATES: *WW-COMMISSION *WW-AGGREGATE *WW-SETTLEMENT

027.00 050.00 030.00

** WW-PLACEMNT-MISC *WW-PLACEMENT-TYPE *WW-PLACEMNT-PERIOD *WW-ARROW-SCORE

000POE 000 00002

***** ISSUER SUB-NAME ***** *WW-CB-FLAG*

WASHINGTON MUTUAL BANK

Y

* MODE L=LFT R=RGT W=WRP Next File •

••FICHINFO1 •• Date 04/02/08 Account 9959 Mode L ••Nxt + •

** DEBTOR INFORMATION **

*WW-CL-ACCT-NO *WW-SSN-1
2818 XXX-XX-8608

*WW-L-NAME-1 *WW-F-NAME-1

HORCHEN REBECCA L

*WW-ADDR1-1 *WW-ADDR2-1

130 E LONG AVE

*WW-CITY-1 *WW-ST-1 *WW-ZIP-1
DU BOIS PA 158012125

*WW-H-PH-1 *WW-W-PH-1 *WW-PH-ALT

814-371-7531 814-772-1809

*WW-POE *WW-POE-ADDR1

*WW-POE-CITY *WW-POE-ST*WW-POE-ZIP

*** SELLER IS WASHINGTON MUTUAL BANK

*WW-ATTY-FIRM-ID *WW-ATTY-ADDRESS

448 *WW-JUDGMENT-DT *WW-JUDGMNT-AMT *WW-JDG-INT *WW-JDG-INT-AMT *WW-JDG-ATTY-FEE
00000000.00 000000 00000000.00 00000000.00

*WW-SUIT-DATE *WW-SUIT-CASE-NO *WW-COURT-NAME *WW-COURT-COST
00000000.00

*

*** BANK INFORMATION ***

* MODE L=LFT R=RGT W=WRP Next File •

••FICHINFO1 •• Date 04/02/08 Account 9959 Mode L ••Nxt + •

*WW-TRUST *WW-DEBTOR *WW-CO-HOLDER

*WW-BANK-NAME *WW-BANK-ABA-NO *WW-BANK-ACCT-NO

ARROW

*WW-PAYOUT *WW-INT-THRU-DT*WW-BANK-LAST-PAY-AMT

18.000 03/19/2008 00000000.00

*WW-ARROW-NAME *WW-CHG-CARD *WW-PRODUCT-TYPE

ARROW FINANCIAL SERVICES LLC

*** SUPPLEMENTAL INFORMATION ***

* MODE L=LFT R=RGT W=WRP Next File •

FILED

JUL 24 2008

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104448
NO: 08-1357-CD
SERVICES 1
COMPLAINT

PLAINTIFF: ARROW FINANCIAL SERVICES, LLC, Assignee
vs.
DEFENDANT: REBECCA L. HORCHEN

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	MANN	005901	10.00
SHERIFF HAWKINS	MANN	005901	85.11

S
FILED
012:30pm
DEC 26 2008
William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

So Answers,

____ Day of _____ 2008



Chester A. Hawkins
Sheriff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

ARROW FINANCIAL SERVICES, LLC : NO. 2008-1357-CD

ASSIGNEE OF WASHINGTON MUTUAL BANK :
5996 W. TOUHY AVENUE : CIVIL ACTION - LAW

NILES IL 60714 :
Plaintiff :
vs. :
REBECCA L HORCHEN :
Defendant(s) :

PRAECIPE FOR JUDGMENT

S FILED

MAY 14 2009

M 14-2009
William A. ShawProthonotary/Clerk of Courts
Clerk w/Notice
TO ATTY & DEPT.

Please enter Judgment in favor of Plaintiff and against Defendant(s),
REBECCA L HORCHEN and ,
for failure to answer the Complaint.

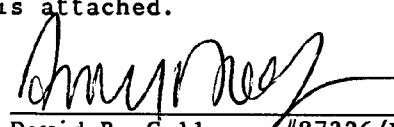
(X) Amount due \$ 14992.25
TOTAL \$ 14992.25 , plus interest and costs

(X) I certify that the foregoing assessment of damages is for specified amounts alleged to be due in the complaint and is calculable as a sum certain from the complaint.

(X) Pursuant to Pa.R.C.P. 237 (Notice of Praeclipe for final judgment or decree), I certify that a copy of this praecipe has been mailed to each other party who has appeared in the action or to his/her Attorney of Record.

(X) Pursuant to Pa.R.C.P. 237.1, I certify that written notice of the intention to file this praecipe was mailed or delivered to the party against whom judgment is to be entered and to his/her Attorney of Record, if any, after the default occurred and at least ten days prior to the date of the filing of this praecipe and a copy of the notice is attached.

DATE: 5/11/09 Signature:


 David R. Galloway #87326/Philip C. Warholic #86341
 Sarah E. Ehasz #86469/Robert N. Polas, Jr. #201259
 Amy F. Doyle #87062
 Mann Bracken LLP / Counsel for Plaintiff
 The Successor by Merger to Wolpoff & Abramson, LLP
 and Eskanas & Adler, P. C.
 4660 Trindle Road, Suite 300, Camp Hill, PA 17011
 Telephone: 866-253-0128 Fax: (717) 737-9051

NOW, MAY 14, 2009, JUDGMENT IS ENTERED AS ABOVE.


 Prothonotary/Clerk, Civil Division

By: _____
 Deputy

REGIONAL OFFICES

TEMPE, AZ
AGOURA HILLS, CA
CONCORD, CA
GREENWOOD VILLAGE, CO
WILMINGTN, DE
BOCA RATCN, FL
ATLANTA, GA
ROCKVILLE, MD
NOVI, MI
CHAMPLIN, MN
HUNTERSVILLE, NC
CARSON CITY, NV
ROCHESTER, NY

**LAW OFFICES
MANN BRACKEN LLP**

Attorneys in the Practice of Debt Collection
(A National Collection Attorney Network Firm)

4660 TRINDLE ROAD

SUITE 300

CAMP HILL, PA 17011

THE SUCCESSOR BY MERGER TO WOLPOFF & ABRAMSON, LLP AND ESKANOS & ADLER, P.C.
(TOLL FREE)
1-800-830-2783
FACSIMILE (866) 281-9028

PLEASE DIRECT CORRESPONDENCE TO CAMP HILL OFFICE

01/08/09

181157337
REBECCA L HORCHEN

130 E LONG AVE
DU BOIS PA 15801

File No. 181157337

Re: ARROW FINANCIAL SERVICES,LLC ASSGNEE OF WASHINGTON MUTUAL BK
vs. REBECCA L HORCHEN
Docket No. 08-1377-CD

Dear REBECCA L HORCHEN

Enclosed herein please find a 10-Day Notice pursuant to Rule 237.1 of the
Pennsylvania Rules of Civil Procedure.

Sincerely,

Philip C. Warholic

David R. Galloway #87326/Philip C. Warholic #86341
Sarah E. Ehasz #86469/Robert N. Polas, Jr. #201259
Amy F. Doyle #87062
Mann Bracken LLP / Counsel for Plaintiff
The Successor by Merger to Wolpoff & Abramson, LLP
and Eskanos & Adler, P. C.
4660 Trindle Road, Suite 300, Camp Hill, PA 17011
Telephone: (717) 303-6700 Fax: (717) 737-9051

CCOPY

Enclosure

CC: REBECCA L HORCHEN

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

REGIONAL OFFICE
INDEPENDENCE,
PORTLAND,
CAMP HILL,
PITTSBURGH,
CLINTON,
NASHVILLE,
HOUSTON,
IRVING,
SAN ANTONIO,
FAIRFAX,
RICHMOND,
VIRGINIA BEACH.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

ARROW FINANCIAL SERVICES, L.L.C. : NO. 08-1377-CD
ASSIGNEE OF WASHINGTON MUTUAL
BANK
5996 W. TOUHY AVENUE
NILES, IL 60714

Plaintiff :
vs.

REBECCA L HORCHEN :
Defendant(s) :

TO: REBECCA L HORCHEN
130 E LONG AVE
DU BOIS PA 15801

DATE OF NOTICE: 01/08/09

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU FAILED TO TAKE THE ACTION REQUIRED OF YOU IN THIS CASE. UNLESS YOU ACT WITHIN TEN (10) 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 NOTICE TO A LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE FOLLOWING OFFICE TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

PA Lawyer Referral Service
Clearfield County Courthouse
David S. Warkolic, Court Administrator
230 East Market Street
Clearfield PA 16830
814-765-2641

By

Philip C. Warkolic
David R. Galloway #87326/Philip C. Warkolic #86341
Sarah E. Ehasz #86469/Robert N. Polas, Jr. #201259
Amy F. Doyle #87062
Mann Bracken LLP / Counsel for Plaintiff
The Successor by Merger to Wolpoff & Abramson, LLP
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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

ARROW FINANCIAL SERVICES, LLC : NO. 2008-1357-CD

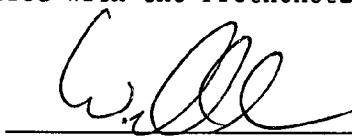
Plaintiff :
vs. : CIVIL ACTION - LAW

REBECCA L HORCHEN :
Defendant(s) :

NOTICE OF JUDGMENT

(x) Notice is hereby given that a Judgment in the above-captioned matter has been entered against you in the amount of \$ 14992.25, plus interest, on MAY 14, 2009.

(x) A copy of all documents filed with the Prothonotary in support of the within judgment is/are attached.

By: 

If you have any questions regarding this Notice, please contact the filing party.


David R. Galloway #87326/Philip C. Warholic #86341
Sarah E. Ehasz #86469/Robert N. Polas, Jr. #201259
Amy F. Doyle #87062
Mann Bracken LLP / Counsel for Plaintiff
The Successor by Merger to Wolpoff & Abramson, LLP
and Eskanos & Adler, P. C.
4660 Trindle Road, Suite 300, Camp Hill, PA 17011
Telephone: 866-253-0128 Fax: (717) 737-9051

(This Notice is given in accordance with Pa.R.C.P. 236.)

NOTICE SENT TO:

REBECCA L HORCHEN

130 E LONG AVE
DU BOIS PA 15801

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

ARROW FINANCIAL SERVICES, LLC : No. 2008-1357-CD

ASSIGNEE OF WASHINGTON MUTUAL BANK :
5996 W. TOUHY AVENUE : CIVIL ACTION - LAW

NILES IL 60714 :
Plaintiff :
v.s. :
REBECCA L HORCHEN :
Defendant(s) :

CERTIFICATE OF RESIDENCE
PA. R.C.P. 236

I hereby certify that the precise residence of Plaintiff is:

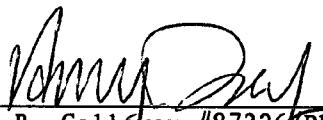
ARROW FINANCIAL SERVICES, LLC

ASSIGNEE OF WASHINGTON MUTUAL BANK
5996 W. TOUHY AVENUE

NILES IL 60714

and certify that the last known address of the within Defendant(s) is:

REBECCA L HORCHEN
130 E LONG AVE
DU BOIS PA 15801


David R. Galloway #87326/Philip C. Warholic #86341
Sarah E. Ehasz #86469/Robert N. Polas, Jr. #201259
Amy F. Doyle #87062
Mann Bracken LLP / Counsel for Plaintiff
The Successor by Merger to Wolpoff & Abramson, LLP
and Eskanos & Adler, P. C.
4660 Trindle Road, Suite 300, Camp Hill, PA 17011
Telephone: 866-253-0128 Fax: (717) 737-9051

FILED
MAY 14 2009
William A. Shaver
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

ARROW FINANCIAL SERVICES, LLC., : NO. 2008-1357-CD
Plaintiff :
vs. : CIVIL ACTION - LAW
REBECCA L. HORCHEN, :
Defendant :
:

FILED
MAY 17 2010
10

William A. Shaw
Prothonotary/Clerk of Courts

ENTRY OF APPEARANCE

TO THE PROTHONOTARY:

Kindly enter my appearance on behalf of Plaintiff, Arrow Financial Services, LLC.,
with regard to the above matter.


Amy F. Doyle, Esquire
PA Supreme Court ID 81062
Doyle Legal Services, LLC.
204 St. Charles Way, Unit E#177
York, PA 17402
717-812-1672
877-202-9420
206-203-3878 (facsimile)
Counsel for Plaintiff

FILED

MAY 17 2009

Probate Court of California, County
of Marin
William A. Schmitz

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

ARROW FINANCIAL SERVICES, LLC
Plaintiff/Petitioner

No. 2008-1357-CD

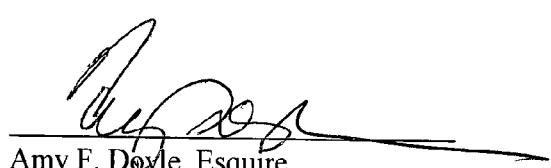
vs.
REBECCA L HORCHEN
Defendant(s)/Respondent(s)

PRAECIPE FOR ENTRY OF APPEARANCE

TO THE PROTHONOTARY:

Kindly enter my appearance on behalf of Plaintiff, with regard to the above matter.

Respectfully submitted,


Amy F. Doyle, Esquire
PA Supreme Court ID 87062
JAFFE & ASHER, LLP
11 East Market St., Ste 102
York, PA 17401
717-885-0718
877-202-9420
717-885-0726 (facsimile)
Counsel for Plaintiff

S
FILED *cc Atty*
2/2/14 *Dayle*
FEB 05 2014

BRIAN K. SPENCER
PROTHONOTARY & CLERK OF COURTS

61