

08-1477-CD

Atlantic Credit vs Joshua Conklin

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

ATLANTIC CREDIT & FINANCE INC.

ASSIGNEE FROM HSBC

(Plaintiff)

c/o Apothaker & Associates, P.C.

2417 Welsh Road, Suite 21 #520

(Street Address)

Philadelphia, PA 19114

(City, State, ZIP)

CIVIL ACTION

No. 2008-1477-C

Type of Case: CIVIL

Type of Pleading: PLEADING

VS.

Filed on Behalf of:

JOSHUA D CONKLIN

(Defendant)

813 DOREY ST

(Street Address)

CLEARFIELD, PA 16830-2767

(City, State, ZIP)

ATLANTIC CREDIT & FINANCE INC.

ASSIGNEE FROM

HSBC

(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)

(Signature)

FILED *ATTY PHD 95.00*
in 11:39a.m 6/1 1 CC Amy
AUG 11 2008 *1 COMPL, 34FF*

William A. Shaw
Prothonotary/Clerk of Courts

Our File No.: 169533
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

ATLANTIC CREDIT & FINANCE INC.) COURT OF COMMON PLEAS
ASSIGNEE FROM HSBC) CLEARFIELD COUNTY
c/o Apotheker & Associates, P.C.)
2417 Welsh Road, Suite 21 #520) NO.:
Philadelphia, PA 19114)
Plaintiff,)
vs.)
JOSHUA D CONKLIN)
813 DOREY ST)
CLEARFIELD, PA 16830-2757)
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
SECCND & MARKET STREETS
CLEARFIELD, PA 16830
814-755-2641

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

ATLANTIC CREDIT & FINANCE INC.) COURT OF COMMON PLEAS
ASSIGNEE FROM HSBC) CLEARFIELD COUNTY
c/o Apcthaker & Associates, P.C.)
2417 Welsh Road, Suite 21 #520) NO.:
Philadelphia, PA 19114)
Plaintiff,)
vs.)
JOSHUA D CONKLIN)
813 DCREY ST)
CLEARFIELD, PA 16830-2767)
Defendant.)

**CIVIL ACTION COMPLAINT
FIRST COUNT**

1. Plaintiff is ATLANTIC CREDIT & FINANCE INC. ASSIGNEE FROM HSBC c/o Apotheker & Associates, P.C., 2417 Welsh Road, Suite 21 #520, Philadelphia, PA 19114.
2. Defendant(s) is/are JOSHUA D CONKLIN, an adult individual residing at 813 DOREY ST CLEARFIELD, PA 16830-2767.
3. Plaintiff, ATLANTIC CREDIT & FINANCE INC. ASSIGNEE FROM HSBC, is the Assignee and Successor in Interest of Account #5408010011202245; and said account was issued to Defendant(s) by HSBC, 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 \$2,728.18. 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 \$2,728.18 and requests this Court award Plaintiff attorney's fees and costs to the extent permitted by applicable law.

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

BY: _____
David J. Apothaker

Dated: 7/30/2008

Our File No.: 169533

VERIFICATION

Cameron O. Gray, hereby states that I am
Authorized Representative 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.

Cameron O. Gray
Plaintiff

DATE:

ATLANTIC CREDIT & FINANCE INC. ASSIGNEE FROM HSBC

JOSHUA D CONKLIN
813 DOREY ST
CLEARFIELD, PA 16830-2767

STATEMENT OF ACCOUNT

Debtcr's Name: JOSHUA D CONKLIN

Account Number: 5408010011202245

Original Creditor: HSBC

Balance Due: \$2,728.18

Our File No : 169533

EXHIBIT "A"

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
NO: 08-1477-CD

ATLANTIC CREDIT & FINANCE INC. Assignee
vs
JOSHUA D. CONKLIN

SERVICE # 1 OF 1

COMPLAINT

SERVE BY: 09/10/2008 HEARING: PAGE: 104524

DEFENDANT: JOSHUA D. CONKLIN
ADDRESS: 813 DOREY ST.
CLEARFIELD, PA 16830

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT OCCUPIED

ATTEMPTS _____

_____ **SHERIFF'S RETURN** _____

NOW, 8/13/08 AT 1105 AM / PM SERVED THE WITHIN

COMPLAINT ON JOSHUA D. CONKLIN, DEFENDANT

BY HANDING TO Rhonda Conklin, wife

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

ADDRESS SERVED 813 Dorey st. Clearfield Pa

NOW _____ AT _____ AM / PM POSTED THE WITHIN

COMPLAINT FOR JOSHUA D. CONKLIN

AT (ADDRESS) _____

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

I MAKE RETURN OF **NOT FOUND** AS TO JOSHUA D. CONKLIN

REASON UNABLE TO LOCATE _____

SWORN TO BEFORE ME THIS

_____ DAY OF _____ 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

Deputy S. Hunter
Deputy Signature
S. Hunter
Print Deputy Name

Our File No.: 169533
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

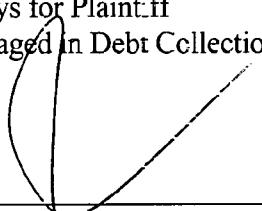
ATLANTIC CREDIT & FINANCE)	COURT OF COMMON PLEAS
INC. ASSIGNEE FROM HSBC)	CLEARFIELD COUNTY
)	
Plaintiff,)	
vs.)	
)	NO. 2008-1477-CD
JOSHUA D CONKLIN)	
)	
Defendant.)	

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: 
David J. Apothaker, Esquire

Dated: September 8, 2008

FILED 1CC & 1Crt of
m 11.10 AM disc issued to
SEP 22 2008 Atty Apothaker
W.A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

COPY

Atlantic Credit & Finance Inc.
HSBC

Vs. No. 2008-01477-CD
Joshua D. Conklin

CERTIFICATE OF DISCONTINUATION

Commonwealth of PA
County of Clearfield

I, William A. Shaw, Prothonotary of the Court of Common Pleas in and for the County and Commonwealth aforesaid do hereby certify that the above case was on September 22, 2008, marked:

Dismissed without prejudice

Record costs in the sum of \$95.00 have been paid in full by David J. Apotheker Esq. .

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 22nd day of September A.D. 2008.



William A. Shaw, Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104524
NO: 08-1477-CD
SERVICES 1
COMPLAINT

PLAINTIFF: ATLANTIC CREDIT & FINANCE INC. Assignee

vs.

DEFENDANT: JOSHUA D. CONKLIN

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	APOTHAKER	100470	10.00
SHERIFF HAWKINS	APOTHAKER	100470	20.00

S
FILED
019-505N
10/7/2008
William A. Shaw
Prothonotary/Clerk of Courts


Sworn to Before Me This

So Answers,

____ Day of _____ 2008



Chester A. Hawkins
Sheriff