

08-1680-CD
LVNV Funding vs Kara J. Yarger

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

LVNV FUNDING LLC
(Plaintiff)
c/o Apothaker & Associates, P.C.
520 Fellowship Road C306
(Street Address)
Mount Laurel, NJ 08054
(City, State, ZIP)

CIVIL ACTION

No. 2008-1680-CD

Type of Case: CIVIL

Type of Pleading: PLEADING

VS.

Filed on Behalf of:

KARA J YARGER
(Defendant)
163 COPENHAVER ST
(Street Address)
MADERA, PA 16661-8801
(City, State, ZIP)

LVNV FUNDING
LLC
(Plaintiff)

*pd \$95.00 Att'y
M/1:45 cm ICC Att'y
SEP - 8 2008 ICC Shft*

William A. Shaw
Prothonotary/Clerk of Courts

David J. Apothaker, Esq.
Apothaker & Associates, P.C.
(Filed by)
520 Fellowship Road C306
Mount Laurel, NJ 08054
(Address)
800-672-0215
(Phone)


(Signature)

Our File No.: 178179
APOTHAKER & ASSOCIATES, P.C.
BY: David J. Apothaker, Esquire, Esq.
Attorney I.D.#38423
520 Fellowship Road C306
Mount Laurel, NJ 08054
(800) 672-0215
Attorneys for Plaintiff

LVNV FUNDING LLC) COURT OF COMMON PLEAS
c/o Apothaker & Associates, P.C.) CLEARFIELD COUNTY
520 Fellowship Road C306)
Mount Laurel, NJ 08054) NO.:
Plaintiff,)
vs.)
KARA J YARGER)
163 COPENHAVER ST)
MADERA, PA 16661-8801)
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

Our File No.: 178179
APOTHAKER & ASSOCIATES, P.C.
BY: David J. Apothaker, Esquire, Esq.
Attorney I.D.#38423
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Mount Laurel, NJ 08054
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Attorneys for Plaintiff

LVNV FUNDING LLC) COURT OF COMMON PLEAS
c/o Apothaker & Associates, P.C.) CLEARFIELD COUNTY
520 Fellowship Road C306)
Mount Laurel, NJ 08054) NO.:
Plaintiff,)
vs.)
KARA J YARGER)
163 COPENHAVER ST)
MADERA, PA 16661-8801)
Defendant.)

**CIVIL ACTION COMPLAINT
FIRST COUNT**

1. Plaintiff is LVNV FUNDING LLC c/o Apotheker & Associates, P.C., 520 Fellowship Road C306, Mount Laurel, NJ 08054.
2. Defendant(s) is/are KARA J YARGER, an adult individual residing at 163 COPENHAVER ST MADERA, PA 16661-8801.
3. Plaintiff, LVNV FUNDING LLC, is the Assignee and Successor in Interest of Account #1150008766109; and said account was issued to Defendant(s) by SEARS, 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 \$2,165.41. 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 \$2,165.41 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, Esquire

Dated: 8/27/2008

Our File No.: 178179

VERIFICATION

David J. Apothaker, Esquire hereby states that I am counsel 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.

David J. Apothaker, Esquire
Attorney for Plaintiff

DATE: 8/27/2008

LVNV FUNDING LLC

KARA J YARGER
163 COPENHAVER ST
MADERA, PA 16661-8801

STATEMENT OF ACCOUNT

Debtor's Name: KARA J YARGER

Account Number: 1150008766109

Original Creditor: SEARS

Balance Due: \$2,165.41

Our File No.: 178179

EXHIBIT "A"

FILED

SEP - 8 2008

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
NO: 08-1680-CD

LVNV FUNDING LLC
vs
KARA J. YARGER

SERVICE # 1 OF 1

COMPLAINT

SERVE BY: 10/08/2008 HEARING: PAGE: 104631

DEFENDANT: KARA J. YARGER
ADDRESS: 163 COPENHAVER ST.
MADERA, PA 16661

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT OCCUPIED

ATTEMPTS

FILED

02:25 pm
SEP 18 2008

William A. Shaw
Prothonotary/Clerk of Courts

SHERIFF'S RETURN

NOW, _____ AT _____ AM / PM SERVED THE WITHIN

COMPLAINT ON KARA J. YARGER, 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 KARA J. YARGER

AT (ADDRESS) _____

NOW 9-18-08 AT 10:34 AM / PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF **NOT FOUND** AS TO KARA J. YARGER

REASON UNABLE TO LOCATE

The Def. is deceased

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

178179

REED & WHITES, P.C.

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

LVNV FUNDING LLC

(Plaintiff)

c/o Apothaker & Associates, P.C.
520 Fellowship Road C306

(Street Address)

Mount Laurel, NJ 08054

(City, State, ZIP)

CIVIL ACTION

No. 2008-1680-CD

Type of Case: CIVIL

Type of Pleading: PLEADING

VS.

Filed on Behalf of:

KARA J YARGER

(Defendant)

163 COPENHAVER ST

(Street Address)

MADERA, PA 16661-8801

(City, State, ZIP)

LVNV FUNDING

LLC

(Plaintiff)

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

SEP - 8 2008

Attest:

Wendell
Prothonotary
Clerk of Courts

David J. Apothaker, Esq.
Apothaker & Associates, P.C.

(Filed by)

520 Fellowship Road C306

Mount Laurel, NJ 08054

(Address)

800-672-0215

(Phone)

[Signature]
(Signature)

LVNV FUNDING LLC

KARA J YARGER
163 COPENHAVER ST
MADERA, PA 16661-8801

STATEMENT OF ACCOUNT

Debtor's Name: KARA J YARGER

Account Number: 1150008766109

Original Creditor: SEARS

Balance Due: \$2,165.41

Our File No.: 178179

EXHIBIT "A"

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104631
NO: 08-1680-CD
SERVICES 1
COMPLAINT

PLAINTIFF: LVNV FUNDING LLC
vs.
DEFENDANT: KARA J. YARGER

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	APOTHAKER	103632	10.00
SHERIFF HAWKINS	APOTHAKER	103632	38.99

S
FILED
01/09/2011
JAN 09 2011
Clerk
William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

So Answers,

Day of 2008



Chester A. Hawkins
Sheriff

Our File No.: 178179
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

5/12/2009
FILED ICC AAA
JAN 30 2009
William A. Shaw
Prothonotary/Clerk of Courts
WAS

LVNV FUNDING LLC) COURT OF COMMON PLEAS
Plaintiff,) CLEARFIELD COUNTY
vs.)
KARA J YARGER) NO. 2008-1680-CD
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: 1/20/2009

FILED

JAN 30 2009

William A. Shaw
Prothonotary/Clerk of Courts