

08-1682-CD

Crown Asset Mang. Vs Richard Young

136997

**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. 2008-1682-CD

Type of Case: CIVIL

Type of Pleading: PLEADING

VS.

Filed on Behalf of:

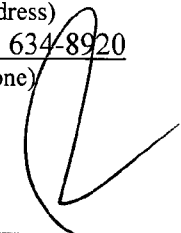
RICHARD C YOUNG  
(Defendant)  
122 HEMLOCK RD  
(Street Address)  
DU BOIS, PA 15801  
(City, State, ZIP)

CROWN ASSET MANAGEMENT,  
LLC  
(Plaintiff)

**FILED** *pd \$95.00 Atty*  
*m/1:55pm ICC Atty*  
*SEP - 8 2008 ICC Sh-fl*  
*USA*

William A. Shaw  
Prothonotary/Clerk of Courts

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)

Our File No.: 136997  
APOTHAKER & ASSOCIATES, P.C.  
BY: David J. Apothaker, Esquire, 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.	)	
RICHARD C YOUNG	)	
122 HEMLOCK RD	)	
DU BOIS, PA 15801	)	
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

APOTHAKER & ASSOCIATES, P.C.  
BY: David J. Apothaker, Esquire, 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.	)	
	)	
RICHARD C YOUNG	)	
122 HEMLOCK RD	)	
DU BOIS, PA 15801	)	
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 RICHARD C YOUNG, an adult individual residing at 122 HEMLOCK RD DU BOIS, PA 15801.
3. Plaintiff, CROWN ASSET MANAGEMENT, LLC, is the Assignee and Successor in Interest of Account #4418029101295563; 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 \$7,161.70. 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 \$7,161.70 and requests this Court award Plaintiff attorney's fees and costs to the extent permitted by applicable law.

### SECOND COUNT

8. Plaintiff, CROWN ASSET MANAGEMENT, LLC, is the Assignee and Successor in Interest of Account #5411179001875800; and said account was issued to Defendant(s) by FIRST NATIONAL BANK OF OMAHA, the Original creditor.

9. Defendant received, accepted and used the account to its benefit.

10. This account is in default and Defendant(s) has an unpaid balance of \$6,843.78. A true and correct copy of the total due and owing is attached hereto, made a part hereof and marked as Exhibit "B".

11. All credits, if any, to which Defendant(s) is entitled, have been applied to the account and are included in Exhibit "B".

12. 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 \$6,843.78 and requests this Court award Plaintiff attorney's fees and costs to the extent permitted by applicable law.

WHEREFORE, Plaintiff demands judgment in favor of Plaintiff and against Defendant(s) for the sum of \$14,005.48 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

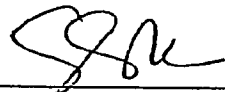
BY: \_\_\_\_\_  
David J. Apothaker, Esquire

Dated: 8/5/2008

Our File No.: 136997

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:

CROWN ASSET MANAGEMENT, LLC

RICHARD C YOUNG  
122 HEMLOCK RD  
DU BOIS, PA 15801

STATEMENT OF ACCOUNT

Debtor's Name: RICHARD C YOUNG  
Account Number: 4418029101295563  
Original Creditor: FIRST NATIONAL BANK OF OMAHA  
Balance Due: \$7,161.70

Our File No.: 136997

EXHIBIT "A"



CROWN ASSET MANAGEMENT, LLC

RICHARD C YOUNG  
122 HEMLOCK RD  
DU BOIS, PA 15801

STATEMENT OF ACCOUNT

Debtor's Name:	RICHARD C YOUNG
Account Number:	5411179001875800
Original Creditor:	FIRST NATIONAL BANK OF OMAHA
Balance Due:	\$6,843.78

Our File No.: 136998

EXHIBIT "B"

**FILED**

**SEP - 8 2008**

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
NO: 08-1682-CD

CROWN ASSET MANAGEMENT, LLC  
vs  
RICHARD C. YOUNG

SERVICE # 1 OF 1

COMPLAINT

SERVE BY: 10/08/2008 HEARING: PAGE: 104633

DEFENDANT: RICHARD C. YOUNG  
ADDRESS: 122 HEMLOCK RD.  
DUBOIS, PA 15801

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT OCCUPIED

ATTEMPTS 9-18-08 - N/A  
9-19-08 - N/A

**SHERIFF'S RETURN**

NOW, 9-24-08 AT 8:52 AM / PM SERVED THE WITHIN

COMPLAINT ON RICHARD C. YOUNG, DEFENDANT

BY HANDING TO Richard Young, Defendant.

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

ADDRESS SERVED Sheriff's office 1N 2ND ST Clearfield Pa 16830

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

COMPLAINT FOR RICHARD C. YOUNG

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

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

I MAKE RETURN OF NOT FOUND AS TO RICHARD C. YOUNG

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

SWORN TO BEFORE ME THIS

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

So Answers: CHESTER A. HAWKINS, SHERIFF

BY: Jerome M. Nexhib  
Deputy Signature

Jerome M. Nexhib  
Print Deputy Name

FILED  
08:40 a.m. GK  
SEP 25 2008 (GK)  
William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104633  
NO: 08-1682-CD  
SERVICES 1  
COMPLAINT

PLAINTIFF: CROWN ASSET MANAGEMENT, LLC  
vs.  
DEFENDANT: RICHARD C. YOUNG

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	APOTHAKE	103899	10.00
SHERIFF HAWKINS	APOTHAKE	103899	64.46

FILED  
03/19/08  
JAN 19 2008  
William A. Shaw  
Prothonotary/Clerk of Courts

Sworn to Before Me This

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

So Answers,

*Chester A. Hawkins*

Chester A. Hawkins  
Sheriff

Our File No.: 136997  
APOTHAKE & 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 FILED ICC Atty  
m/a:05um Apothaker  
JAN 17 2012  
William A. Shaw  
Prothonotary/Clerk of Courts

CROWN ASSET MANAGEMENT,  
LLC

Plaintiff,

vs.

RICHARD C YOUNG

Defendant.

) COURT OF COMMON PLEAS  
) CLEARFIELD COUNTY  
)  
)  
)  
)  
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)  
)  
)  
)

NO. 2008-1682-CD

**PRAECIPE TO DISMISS WITHOUT PREJUDICE**

TO THE PROTHONOTARY:

Kindly dismiss this action without prejudice.

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

By: \_\_\_\_\_  
David J. Apothaker, Esquire

Dated: 12/29/2011



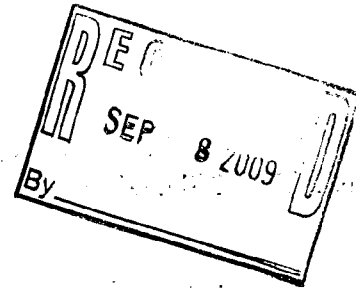
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**FILED**

**JAN 17 2012**

William A. Shaw  
Prothonotary/Clerk of Courts

Our file No.: 136997 - 2  
APOTHAKE & ASSOCIATES, P.C.  
520 Fellowship Road C306  
Mount Laurel, NJ 08054  
(800) 672-0215  
Attorneys for Plaintiff  
Attorney ID# 38423



CROWN ASSET MANAGEMENT, LLC

Plaintiff,

vs.

RICHARD C YOUNG

Defendant.

) COURT OF COMMON PLEAS  
) CLEARFIELD COUNTY  
)

) DOCKET NO.: 2008-1682-CD  
)

) Civil Action  
)

) STIPULATION IN LIEU OF JUDGMENT  
)  
)

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 31, 2009, STIPULATED by and between Plaintiff, CROWN ASSET MANAGEMENT, LLC, and Defendant, RICHARD C YOUNG parties as follows:

1. Defendant agrees to pay the sum of \$ 5,912.55, which sum Plaintiff agrees to accept in full settlement of its claim herein, inclusive of counsel fees and court costs.

2. As of this date, payments totaling \$ 1750.00 have been applied to the amount of \$ 7662.54, and the amount due and owing as of August 31, 2009 is \$5912.55.

3. The sum aforesaid of \$5912.55 shall be paid by the by Defendant, RICHARD C YOUNG, to the attorneys for Plaintiff in the following manner:

b. \$250.00 to be paid on or before the 31st day of each month, beginning September 31, 2009 until paid in full.

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

FILED  
m1103821  
SEP 18 2009

William A. Shaw  
Prothonotary/Clerk of Courts

Our file No.: 136997

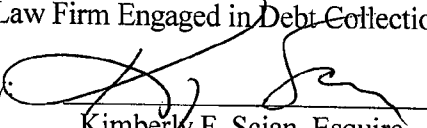
3. In the event Defendant fails to pay in accordance with the terms set forth in this Stipulation, then, and in that event, Plaintiff shall be entitled to obtain the entry of Judgment against Defendant *ex parte*, in the sum of \$5,912.55, giving Defendant credit for any sums actually paid pursuant to the terms of this Stipulation.

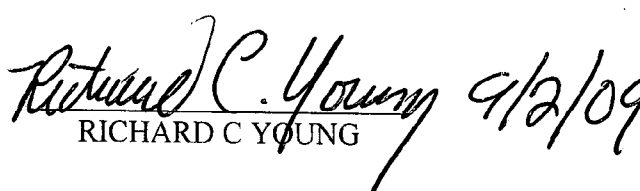
4. In the event of default as aforesaid, and default is not cured within ten (10) days, Plaintiff shall be entitled to obtain the entry of Judgment upon *ex parte* application, with supporting certification, and with notice to Defendant only in the form of a copy of the application addressed to RICHARD C YOUNG 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

  
RICHARD C YOUNG 9/2/09