

08-1800-CD

Asset Acceptance vs Lisa C. Lorson

0

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

ASSET ACCEPTANCE LLC  
PO Box 2036  
Warren, MI 48090

Plaintiff

vs.

LISA C LORSON  
321 JONES LN  
CLEARFIELD PA 16830

Defendant

CIVIL ACTION

NO: 08-1800-CD

**NOTICE TO DEFEND**

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 to Defend 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 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 ON AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT REDUCED FEE OR NO FEE.

MIDPENN LEGAL SERVICES  
211 1/2 E LOCUST STREET  
CLEARFIELD, PA 16830  
814-765-9646

Feb 18, 2009 Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.

Deputy Prothonotary

Aug 03, 2009 Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.

Deputy Prothonotary

FILED  
m12:27:02  
SEP 22 2008  
Any pd. 95.00  
No CC  
William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

ASSET ACCEPTANCE LLC  
PO Box 2036  
Warren, MI 48090

Plaintiff

vs.

LISA C LORSON  
321 JONES LN  
CLEARFIELD PA 16830

Defendant

CIVIL ACTION

NO:

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**COMPLAINT**

Plaintiff, ASSET ACCEPTANCE LLC , by and through its attorneys, Edwin A.

Abrahamsen & Associates, P.C., complains of the Defendant as follows:

1. Plaintiff, ASSET ACCEPTANCE LLC , (hereinafter "Plaintiff") is a Michigan corporation with a principal place of business located at PO Box 2036 Warren, MI 48090.
2. The Defendant LISA C LORSON (hereinafter "Defendant") is an adult individual residing at 321 JONES LN CLEARFIELD PA 16830.
3. At all relevant times herein, Plaintiff was engaged in the business of debt purchase and collection.
4. Defendant applied for and received a credit card issued by HSBC Consumer Lending (US with the account number 71172300616459.
5. The within account was sold by HSBC Consumer Lending (US to ASSET ACCEPTANCE, LLC for valuable consideration and all rights under said accounts were assigned to ASSET ACCEPTANCE, LLC. (See, Bill of Sale, Affidavit and Assignment attached hereto as

Exhibit "A.")

6. Use of the HSBC Consumer Lending (US credit card was subject to the terms of the Cardmember Agreement, a copy of which was sent to the Defendant along with the credit card.

7. Defendant used the HSBC Consumer Lending (US credit card account number 71172300616459, for purchases, cash advances and/or balance transfers.

8. The Defendant was mailed account statements relative to the Defendant's use of the subject credit card (See, Card Statements attached hereto as Exhibit "B.")

9. The Defendant defaulted under the terms of the Agreement by failing and refusing to make monthly payments on the account as they became due.

10. The account became delinquent July 21, 2006.

11. The principal amount was \$12,151.94 at the time it was received by Plaintiff.

12. Pursuant to the account agreement, any unpaid balance accrues interest at the rate of 17.

13. The total amount due and owing the Plaintiff including interest, is \$14,681.91.

14. Pursuant to the terms of the Agreement, Defendant is liable to Plaintiff for court costs and reasonable attorney's fees.

WHEREFORE, Plaintiff requests judgment in its favor and against Defendant in the amount of \$14,681.91 plus costs of suit, reasonable attorneys' fees and any other relief as the Court deems just and appropriate.

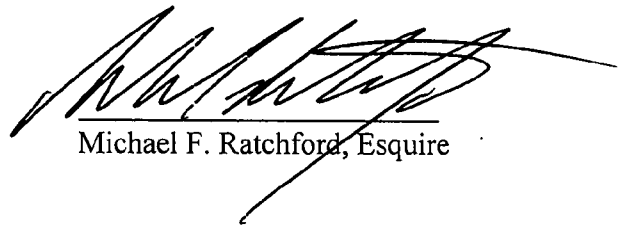
Respectfully submitted,

A handwritten signature in black ink, appearing to read "Edwin A. Abrahamsen", is written over a horizontal line.

Edwin A. Abrahamsen & Assoc.  
Michael F. Ratchford, Esquire  
Heather K. Woodruff, Esquire  
Attorney I.D. Nos.: 86285/207805  
1729 Pittston Avenue  
Scranton, PA 18505  
mratchford@eaa-law.com  
hwoodruff@eaa-law.com

**VERIFICATION**

I, Michael F. Ratchford, attorney for Plaintiff, ASSET ACCEPTANCE LLC , am fully familiar with the facts set forth in the within Complaint and am authorized to make this Verification on behalf of Plaintiff. I Verify that the facts set forth in the within allegations are true and correct to the best of my knowledge, knowing that any false statements are punishable by law pursuant to 18 C.S.A. 4904.

  
Michael F. Ratchford, Esquire

STATE OF MICHIGAN       )  
                                   )  
 COUNTY OF MACOMB       )       ss

ASSET ACCEPTANCE, LLC

Plaintiff,

vs

LISA C LORSON

Defendant,

I, Deanna Jason

being first duly sworn deposes and states:

AFFIDAVIT

That I am the Supervisor of ASSET ACCEPTANCE, LLC a Limited Liability company organized and existing under the laws of the State of Delaware and doing business at P.O. BOX 2041, WARREN, MI 48090.

That there is justly due and owing on the account, the sum of \$13974.43 representing the charged off amount and interest.

That the said account originally with HSBC CONSUMER LENDING USA/, account number 71172300616459, has been purchased by ASSET ACCEPTANCE, LLC, who now owns said account and has all rights connected therewith including the right to institute this action.

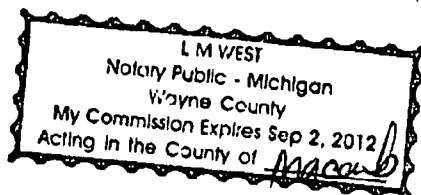
That we have been unable to determine if the Defendant is in the military service of the United States of America. Further, we are unable to determine if the Defendant is entitled to rights and privileges provided under the Servicemembers Civil Relief Act.

Dated this 21st day of May, 2008.

Deanna Jason  
 Supervisor

Subscribed and sworn to before me, a Notary Public for the State of Michigan, the 21st of May, 2008 as certified by my hand as set forth immediately below.

L. M. West  
 Notary Public



06664

Exhibit B

**ASSET ACCEPTANCE LLC**

P.O. Box 2036  
Warren, MI 48090

LISA C LORSON  
321 JONES LN  
CLEARFIELD, PA 16830

ACCOUNT NUMBER	CURRENT BALANCE
71172300616459	\$13974.43
STATEMENT DATE	DUE DATE
MAY 21 2008	DUE

ACCOUNT NUMBER	DATE OF LAST PAYMENT
71172300616459	07/21/06

DATE	REFERENCE NO	ACCOUNT INFORMATION	BALANCE DUE
MAY 21 2008	35528472	BALANCE DUE ASSET ACCEPTANCE LLC, A LIMITED LIABILITY COMPANY ORGANIZED AND EXISTING UNDER THE LAWS OF THE STATE OF DELAWARE, ASSIGNEE OF 71172300616459 P.O. Box 2036, Warren, MI 48090	\$13974.43

DATE OF DELINQUENCY	PURCHASED ON	CHARGE OFF AMOUNT*	INTEREST RATE
09/03/06	11/27/07	\$12151.94	17.00%

SERVICE ADDRESS (IF APPLICABLE)	INTEREST DUE AS OF MAY 21 2008
	\$1822.49

\*For purposes of this Statement only, Charge Off Amount reflects credits for payments received by Asset, if any.

THIS COMMUNICATION IS FROM A DEBT COLLECTOR

35528472  
1059 EDWIN A ABRAHAMSEN

df



ASSET ACCEPTANCE LLC

Plaintiff

vs.

LISA C LORSON  
321 JONES LN  
CLEARFIELD PA 16830  
Defendant

In the Court of Common Pleas of  
Clearfield County, Pennsylvania  
Civil Division

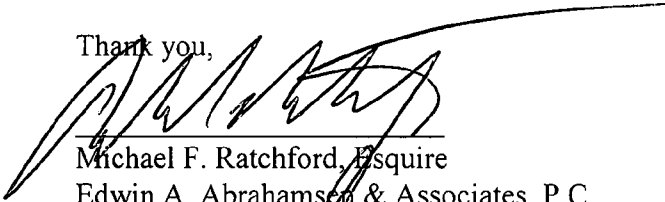
NO: 2008-1800-CD

Praeipce to Reinstate Civil Complaint

To the Prothonotary of Clearfield County Pennsylvania:

Please enter the above Praeipce to Reinstate the Civil Complaint.

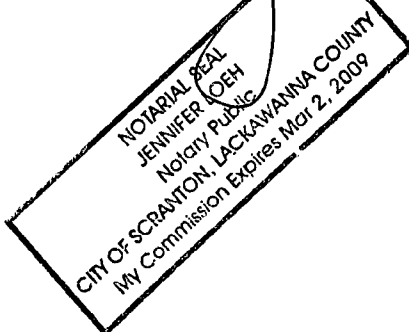
Thank you,

  
Michael F. Ratchford, Esquire  
Edwin A. Abrahamson & Associates, P.C.  
Lawyer ID # 86285

5 FILED pd \$7.00 A44  
m 2:00pm reinstated  
FEB 18 2009 Complaint to  
Shft & A44.  
William A. Shaw  
Prothonotary/Clerk of Courts

Sworn and subscribed before me on this 12th day of Feb 2009

  
Jennifer Loeh, Notary Public



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
NO: 08-1800-CD

ASSET ACCEPTANCE LLC  
vs  
LISA C. LORSON

SERVICE # 1 OF 1

COMPLAINT

SERVE BY: 03/20/2009 HEARING: PAGE: 105290

DEFENDANT: LISA C. LORSON  
ADDRESS: 321 JONES LN.  
CLEARFIELD, PA 16830

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT

ATTEMPTS

House burnt down

FILED

018:30Lm

MAR 23 2009

William A. Shaw  
Notary/Clerk of Courts

SHERIFF'S RETURN

NOW, \_\_\_\_\_ AT \_\_\_\_\_ AM / PM SERVED THE WITHIN

COMPLAINT ON LISA C. LORSON, 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 LISA C. LORSON

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

NOW 3-23-09 AT 830 AM / PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF NOT FOUND AS TO LISA C. LORSON

REASON UNABLE TO LOCATE NOT FOUND

SWORN TO BEFORE ME THIS

\_\_\_\_\_ DAY OF \_\_\_\_\_ 2009

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

Deputy Signature

S. Hunter

Print Deputy Name

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

ASSET ACCEPTANCE LLC  
PO Box 2036  
Warren, MI 48090

Plaintiff

vs.

LISA C LORSON  
321 JONES LN  
CLEARFIELD PA 16830

Defendant

CIVIL ACTION

NO: 08-1800-CD

**NOTICE TO DEFEND**

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 to Defend 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 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 ON AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT REDUCED FEE OR NO FEE.

MIDPENN LEGAL SERVICES  
211 1/2 E LOCUST STREET  
CLEARFIELD, PA 16830  
814-765-9646

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

NOV 03 2008

Attest.

*William L. Khan*  
Prothonotary/  
Clerk of Courts  
Original filed Sept. 22, 2008

Feb. 18, 2009 Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.  
*William L. Khan*  
Deputy Prothonotary

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

ASSET ACCEPTANCE LLC  
PO Box 2036  
Warren, MI 48090

Plaintiff

vs.

LISA C LORSON  
321 JONES LN  
CLEARFIELD PA 16830

Defendant

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: CIVIL ACTION  
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: NO:  
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**COMPLAINT**

Plaintiff, ASSET ACCEPTANCE LLC , by and through its attorneys, Edwin A.

Abrahamsen & Associates, P.C., complains of the Defendant as follows:

1. Plaintiff, ASSET ACCEPTANCE LLC , (hereinafter "Plaintiff") is a Michigan corporation with a principal place of business located at PO Box 2036 Warren, MI 48090.
2. The Defendant LISA C LORSON (hereinafter "Defendant") is an adult individual residing at 321 JONES LN CLEARFIELD PA 16830.
3. At all relevant times herein, Plaintiff was engaged in the business of debt purchase and collection.
4. Defendant applied for and received a credit card issued by HSBC Consumer Lending (US with the account number 71172300616459.
5. The within account was sold by HSBC Consumer Lending (US to ASSET ACCEPTANCE, LLC for valuable consideration and all rights under said accounts were assigned to ASSET ACCEPTANCE, LLC. (See, Bill of Sale, Affidavit and Assignment attached hereto as

Exhibit "A.")

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7. Defendant used the HSBC Consumer Lending (US credit card account number 71172300616459, for purchases, cash advances and/or balance transfers.

8. The Defendant was mailed account statements relative to the Defendant's use of the subject credit card. (See, Card Statements attached hereto as Exhibit "B.")

9. The Defendant defaulted under the terms of the Agreement by failing and refusing to make monthly payments on the account as they became due.

10. The account became delinquent July 21, 2006.

11. The principal amount was \$12,151.94 at the time it was received by Plaintiff.

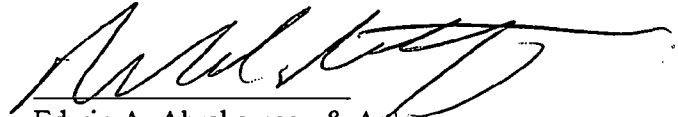
12. Pursuant to the account agreement, any unpaid balance accrues interest at the rate of 17.

13. The total amount due and owing the Plaintiff including interest, is \$15,103.30.

14. Pursuant to the terms of the Agreement, Defendant is liable to Plaintiff for court costs and reasonable attorney's fees.

WHEREFORE, Plaintiff requests judgment in its favor and against Defendant in the amount of \$15,103.30 plus costs of suit, reasonable attorneys' fees and any other relief as the Court deems just and appropriate.


Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Edwin A. Abrahamsen', is written over a horizontal line.

Edwin A. Abrahamsen & Assoc.  
Michael F. Ratchford, Esquire  
Heather K. Woodruff, Esquire  
Attorney I.D. Nos.: 86285/207805  
1729 Pittston Avenue  
Scranton, PA 18505  
mratchford@eaa-law.com  
hwoodruff@eaa-law.com

**VERIFICATION**

I, Michael F. Ratchford, attorney for Plaintiff, ASSET ACCEPTANCE LLC , am fully familiar with the facts set forth in the within Complaint and am authorized to make this Verification on behalf of Plaintiff. I Verify that the facts set forth in the within allegations are true and correct to the best of my knowledge, knowing that any false statements are punishable by law pursuant to 18 C.S.A. 4904.

  
Michael F. Ratchford, Esquire

STATE OF MICHIGAN )  
COUNTY OF MACOMB ) ss

ASSET ACCEPTANCE, LLC

Plaintiff,

vs

LISA C LORSON

Defendant,

I, Deanna Jason

being first duly sworn deposes and states:

AFFIDAVIT

That I am the Supervisor of ASSET ACCEPTANCE, LLC a Limited Liability company organized and existing under the laws of the State of Delaware and doing business at P.O. BOX 2041, WARREN, MI 48090.

That there is justly due and owing on the account, the sum of \$13974.43 representing the charged off amount and interest.

That the said account originally with HSBC CONSUMER LENDING USA/, account number 71172300616459, has been purchased by ASSET ACCEPTANCE, LLC, who now owns said account and has all rights connected therewith including the right to institute this action.

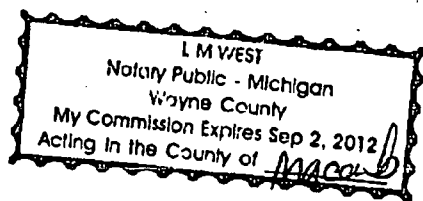
That we have been unable to determine if the Defendant is in the military service of the United States of America. Further, we are unable to determine if the Defendant is entitled to rights and privileges provided under the Servicemembers Civil Relief Act.

Dated this 21st day of May, 2008.

Deanna Jason  
Supervisor

Subscribed and sworn to before me, a Notary Public for the State of Michigan, the 21st of May, 2008 as certified by my hand as set forth immediately below.

L. M. West  
Notary Public



06664



**ASSET ACCEPTANCE LLC**

P.O. Box 2036  
Warren, MI 48090

LISA C LORSON  
321 JONES LN  
CLEARFIELD, PA 16830

ACCOUNT NUMBER	CURRENT BALANCE
71172300616459	\$13974.43
STATEMENT DATE	DUE DATE
MAY 21 2008	DUE

ACCOUNT NUMBER	DATE OF LAST PAYMENT
71172300616459	07/21/06

DATE	REFERENCE NO	ACCOUNT INFORMATION	BALANCE DUE
MAY 21 2008	35528472	BALANCE DUE ASSET ACCEPTANCE LLC, A LIMITED LIABILITY COMPANY ORGANIZED AND EXISTING UNDER THE LAWS OF THE STATE OF DELAWARE, ASSIGNEE OF 71172300616459 P.O. Box 2036, Warren, MI 48090	\$13974.43

DATE OF DELINQUENCY	PURCHASED ON	CHARGE OFF AMOUNT*	INTEREST RATE
09/03/06	11/27/07	\$12151.94	17.00%

SERVICE ADDRESS (IF APPLICABLE)	INTEREST DUE AS OF MAY 21 2008
	\$1822.49

\*For purposes of this Statement only, Charge Off Amount reflects credits for payments received by Asset, if any.

THIS COMMUNICATION IS FROM A DEBT COLLECTOR

35528472  
1059 EDWIN A ABRAHAMSEN

28

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 105290  
NO: 08-1800-CD  
SERVICES 1

COMPLAINT

PLAINTIFF: ASSET ACCEPTANCE LLC  
vs.  
DEFENDANT: LISA C. LORSON

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	ABRAHAMSEN	029234	10.00
SHERIFF HAWKINS	ABRAHAMSEN	029234	7.00

**FILED**  
01/21/09  
APR 30 2009  
William A. Shaw  
Prothonotary/Clerk of Courts

Sworn to Before Me This

\_\_\_\_\_ Day of \_\_\_\_\_ 2009

So Answers,

*Chester A. Hawkins*

Chester A. Hawkins  
Sheriff

ASSET ACCEPTANCE LLC  
P.O. Box 2036  
Warren MI 48090-2036

Plaintiff

vs.

LISA C LORSON  
1211 Woodland Rd  
CLEARFIELD PA 16830

Defendant

In the Court of Common Pleas of  
Clearfield County, Pennsylvania  
Civil Division

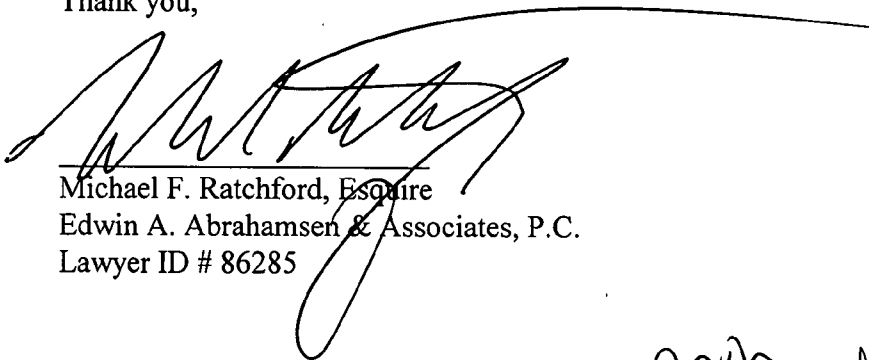
NO: 08-1800-CD

Praeipce to Reinstate Civil Complaint

To the Prothonotary of Clearfield County Pennsylvania:

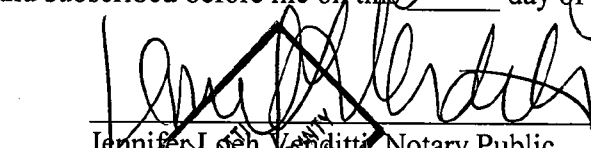
Please enter the above Praeipce to Reinstate the Civil Complaint.

Thank you,

  
Michael F. Ratchford, Esquire  
Edwin A. Abrahamsen & Associates, P.C.  
Lawyer ID # 86285

5 FILED Any pd.  
7.00  
AUG 03 2009  
William A. Shaw  
Prothonotary/Clerk of Courts  
1CC#1  
Compl.  
Reinstated  
to Sheriff  
(GW)

Sworn and subscribed before me on this 29th day of July 2009

  
Jennifer Loeh Venditti, Notary Public  
NOTARIAL SEAL  
JENNIFER LOEH VENDITTI  
Notary Public  
SCRANTON CITY, LACKAWANNA COUNTY  
My Commission Expires Mar 6, 2012

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
NO: 08-1800-CD

ASSET ACCEPTANCE LLC  
vs  
LISA C. LORSON

SERVICE # 1 OF 1

COMPLAINT

SERVE BY: 09/02/2009 HEARING: PAGE: 106001

DEFENDANT: LISA C. LORSON  
ADDRESS: 1211 WOODLAND RD  
CLEARFIELD, PA 16830

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT

ATTEMPTS

FILED  
0/8:30Lm  
AUG - 7 2009

William A. Shaw  
Prothonotary/Clerk of Courts  
OCCUPIED

SHERIFF'S RETURN

NOW, 8-6-09 AT 11:16 AM/PM SERVED THE WITHIN

COMPLAINT ON LISA C. LORSON, DEFENDANT

BY HANDING TO Nick Lorson, Husband

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

ADDRESS SERVED 1211 Woodland Rd.  
Clearfield, Pa. 16830

NOW AT AM / PM POSTED THE WITHIN

COMPLAINT FOR LISA C. LORSON

AT (ADDRESS)

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

I MAKE RETURN OF NOT FOUND AS TO LISA C. LORSON

REASON UNABLE TO LOCATE

SWORN TO BEFORE ME THIS

DAY OF 2009

So Answers. CHESTER A. HAWKINS, SHERIFF

BY: James E. Davis

Deputy Signature

James E. Davis

Print Deputy Name

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 106001  
NO: 08-1800-CD  
SERVICES 1

COMPLAINT

PLAINTIFF: ASSET ACCEPTANCE LLC  
vs.  
DEFENDANT: LISA C. LORSON

**FILED**

01/18/578N  
DEC 29 2009

William A. Shaw  
Prothonotary/Clerk of Courts

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	EDWIN A ABRAHAMSEN	046301	10.00
SHERIFF HAWKINS	EDWIN A ABRAHAMSEN	046301	11.44

Sworn to Before Me This

\_\_\_\_\_ Day of \_\_\_\_\_ 2009

So Answers,



Chester A. Hawkins  
Sheriff

**FILED**

**DEC 29 2009**

William A. Shaw  
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY  
PENNSYLVANIA

FILED

MAR 10 2010

William A. Shaw  
Prothonotary/Clerk of Courts

NO 4/C

3/10/2010

Asset Acceptance Inc  
(Plaintiff)

CIVIL ACTION

\_\_\_\_\_  
(Street Address)

No. 08-1800-CD

Type of Case: Owe money to them

\_\_\_\_\_  
(City, State ZIP)

Type of Pleading: ANSWER

VS.

LISA LORSON  
(Defendant)

Filed on Behalf of:

\_\_\_\_\_  
(Plaintiff/Defendant)

1211 woodland Rd  
(Street Address)

Clearfield PA 16830  
(City, State ZIP)

LISA LORSON  
(Filed by)

1211 woodland Rd  
(Address)

814 765-1790  
(Phone)

Lisa Lorson  
(Signature)

DC 08-1800-CD

File # AA8-0664/GP

Asset Acceptance LLC  
Plaintiff

VS

Lisa Larson  
Defendant

Wednesday February 24<sup>th</sup> 2010

Lisa Larson



Doc 08-1800-CD

File # AA8-0644 /GP

- 1 I Do not Deny I owe This bill
- 2 We lost our home due to local taxes that were back 2 years
- 3 we did have to sell every thing that we had of any value to pay some bill and to have money for a place to live
- 4 My husband had lost his Job to China because what he did could be done In China Cheaper
- 5 I have 2 Children still with me one child that is mentally Retarded and one child Going to Collage
- 6 At this time I have nothing of any Value left we no Savings, CD, IRA's, ect

I have included A list of the things that we have left but there is no value in any of it due to it being 2<sup>nd</sup> hand and a lot of it is broken

DOC # 08-1800-CD

File # AA8-0664/GP.

Refridgerator

Stove

Washer and Dryer

Couch and Love seat

2 tv.

1 wood shelf

Sm Hutch

Record cabinet

Record player with Radio

1 Desk

3 Shelf units

2 twin beds 1 queen bed

3 Dressers

Table no chairs

Costume jewelry

We do own a van that is 14 years old

Lisa Larson



**IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA**

Asset Acceptance, LLC,

Plaintiff

v.

Lisa Lorson,

Defendant

CIVIL ACTION

No. 2008-1800-CD

**MOTION FOR SUMMARY JUDGMENT**

Plaintiff, Asset Acceptance, LLC, by and through its attorneys, Edwin A. Abrahamsen & Associates, brings this Motion for Summary Judgment, pursuant to Pa.R.C.P. 1035.1, et seq., and in support there avers the following:

1. Defendant applied for and received a credit card issued from HSBC Consumer Lending USA with the account number 71172300616459.
2. The within account was assigned by HSBC Consumer Lending USA to Asset Acceptance, LLC for valuable consideration and all rights under said accounts were assigned to Asset Acceptance, LLC.
3. Use of the HSBC Consumer Lending USA credit card was subject to the terms and conditions of the Cardmember Agreement (hereinafter "Agreement"), a copy of which was sent along to the Defendant with the credit card.
4. Defendant used the HSBC Consumer Lending USA credit card with account number 71172300616459 for purchases, cash advances, and/or balance transfers. Use of the card in this manner constituted acceptance of the terms and conditions and subjects the Defendant to the terms and conditions contained in the Cardmember Agreement.

**FILED**

APR 19 2010

William A. Shaw  
Prothonotary/Clerk of Courts

5. The Defendant defaulted under the terms of the Agreement by failing and refusing to make monthly payments on the account as they became due.

6. The account became delinquent on July 21, 2006.

7. On December 12, 2009, Plaintiff received Defendant's Pro Se Answer to the Complaint. See Exhibit "A".

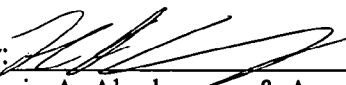
8. Defendant, in her Answer, acknowledged owing the debt claimed in Plaintiff's Complaint. See Exhibit "A".

9. Defendant did not put forth any affirmative defenses nor did she contest any of the facts alleged in Plaintiff's Complaint.

10. Therefore, due to the Defendant conceding that she owes the outstanding debt and failing to contest any of the factual allegations contained in Plaintiff's Complaint, judgment should be granted in Plaintiff's favor under Pa.R.C.P. 1035.2(1).

**WHEREFORE**, Plaintiff requests judgment in its favor and against Defendant, in the amount of \$15,103.30 as well as any other relief the Court deems just and equitable. An appropriate Order is attached.

Respectively submitted,

By:   
Edwin A. Abrahamsen & Associates, P.C.  
Michael F. Ratchford, Esquire  
Kevin J. Cummings, Esquire  
Attorney I.D. Nos.: 86285/209660  
120 N Keyser Avenue  
Scranton, PA 18504  
(570) 558-5510 Ex.113

**IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA**

Asset Acceptance, LLC,

Plaintiff

v.

Lisa Lorson,

Defendant

CIVIL ACTION

No. 2008-1800-CD


**CERTIFICATE OF SERVICE**

I, Kevin J. Cummings, Esquire, hereby certify that I caused a true and correct copy of Plaintiff's Motion for Summary Judgment was served via first class United States Mail, postage prepaid on the date set forth below upon the following:

Lisa Lorson  
1211 Woodland Road  
Clearfield, PA 16830

Edwin A. Abrahamsen & Associates, P.C.

Date: 4-16-10

By:   
Michael F. Ratchford, Esquire  
Kevin J. Cummings, Esquire  
Attorney I.D. Nos.: 86285/209660  
120 N Keyser Avenue  
Scranton, PA 18504  
(570) 558-5510

# EXHIBIT A

AA 8-0664

Doc: # 08-1800 - CD

File: #

LISA Lorson

1 I Do not Deny I owe This Amount

2 My Situation had Changed I had Developed Health problems

3 My Husband had his job sent to China and they had no outhur posistion to place him in

4 We had to sell any-thing of Value we had to set some things Right

5 We lost our home to taxes and had no home for Awhile

6 We have no outhur Resources Available to us no CD's, IRA's, Savings ect.

7 Currently I am on disability and very little income



DC: # 08-1800-CD

Lisa Larson

Find below a list of things I have left

love seat & sofa

television

Kitchen table no chairs

Refridgarator

Stove

Washer & Dryer

stero

Desk

Queen size bed

Dresser

Chest of Drawers

15 year old computer

Custom Jewelry

Clothing

Dishes

That is about it the list above is as complete as I can guess. I have not included anything my children have bough with their own money from their jobs, and most of the things listed are at 10 years old plus.

To Whom it may concern:

I have enclosed a copy of the 2nd set of papers with or at the office of the Prothonotary at the court house here in Clearfield. I Am sorry that I can't call your office at this time, my Phone Is broken, and I may lose my electric because I Don't have the money to pay my bill at this time. I don't have long distance on my Phone. I did send 1 set to you but Aparently you Did not Receive it so I had This one sent Registered mail.

Thank You for your help

Lisa Larson

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY  
PENNSYLVANIA

ASST Acceptanc LLC  
(Plaintiff)

CIVIL ACTION

120 North Keyser Ave  
(Street Address)

No. 08-1800-C2

Scranton PA 18504  
(City, State ZIP)

Type of Case: Civil

Type of Pleading: DO owe

VS.

LISA Lorson  
(Defendant)

Filed on Behalf of:

LISA Lorson  
(Plaintiff/Defendant)

1211 Woodland Rd  
(Street Address)

Clearfield PA 16830  
(City, State ZIP)

LISA Lorson  
(Filed by)

1211 Woodland Rd  
(Address)

(814) 765- Phone is currently  
(Phone) Broken

Lisa Lorson  
(Signature)

**FILED**

**APR 19 2010**

**William A. Shaw**  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

Asset Acceptance, LLC,

Plaintiff

v.

Lisa Lorson,

Defendant

CIVIL ACTION

No. 2008-1800-CD

**FILED**

APR 20 2010

6/3-36  
William A. Shaw  
Prothonotary/Clerk of Courts

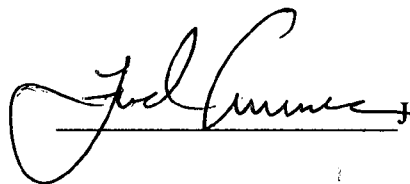
1 cent to Att

**ORDER**

AND NOW, this 20<sup>th</sup> day of April, 2010, upon

consideration of the Plaintiff, Asset Acceptance, LLC's, Motion for Summary Judgment, and any response thereto, it is hereby **ORDERED** that the Plaintiff, Asset Acceptance, LLC's, Motion for Summary Judgment is **GRANTED**. Judgment is hereby entered in favor of the Plaintiff in the amount of \$15,103.30.

BY THE COURT:



**FILED**  
APR 20 2010  
William A. Shaw  
Prothonotary/Clerk of Courts