

08-1856-CD  
Portfolio Rec. Assoc. vs F. St. Clair

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

PORTFOLIO RECOVERY ASSOCIATES,  
LLC  
(Plaintiff)  
c/o Apotheker & Associates, P.C.  
520 Fellowship Road C306  
(Street Address)  
Mount Laurel, NJ 08054  
(City, State, ZIP)

CIVIL ACTION

No. 08-1856-CD

Type of Case: CIVIL

Type of Pleading: PLEADING

VS.

Filed on Behalf of:

FREDERICK L STCLAIR  
(Defendant)  
10 WOOD AVE  
(Street Address)  
CLEARFIELD, PA 16830  
(City, State, ZIP)

PORTFOLIO RECOVERY ASSOCIATES,  
LLC  
(Plaintiff)

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

(Signature)

**FILED**  
M 11/3/2008 Atty pd.  
SEP 29 2008 95.00  
W.A. Apotheker  
William A. Shaw  
Prothonotary/Clerk of Courts 100 Sheriff

Our File No.: 172632  
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

PORFOLIO RECOVERY ASSOCIATES, LLC  
c/o Appthaker & Associates, P C.  
520 Fellowship Road C305  
Mount Laurel, NJ 08054  
Plaintiff,  
vs.  
FREDERICK L STCLAIR  
10 WOOD AVE  
CLEARFIELD, PA 16830  
Defendant.

) COURT OF COMMON PLEAS  
 ) CLEARFIELD COUNTY  
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## 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  
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COURT ADMINISTRATOR  
CLEARFIELD COUNTY COURTHOUSE  
SECOND & MARKET STREETS  
CLEARFIELD, PA 16830  
814-765-2641

Our File No.: 172632  
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BY: David J. Apothaker, Esquire, Esq.  
Attorney I.D.#38423  
520 Fellowship Road C306  
Mount Laurel, NJ 08054  
(800) 672-0215  
Attorneys for Plaintiff

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ASSOCIATES, LLC  
c/c Apothaker & Associates, P.C.  
520 Fellowship Road C306  
Mount Laurel, NJ 08054  
Plaintiff,  
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CLEARFIELD, PA 16830  
Defendant.

) COURT OF COMMON PLEAS  
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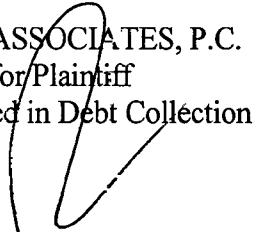
CIVIL ACTION COMPLAINT  
FIRST COUNT

1. Plaintiff is PORTFOLIO RECOVERY ASSOCIATES, LLC c/o Apothaker & Associates, P.C.,  
520 Fellowship Road C306, Mount Laurel, NJ 08054.
2. Defendant(s) is/are FREDERICK L STCLAIR, an adult individual residing at 10 WOOD AVE  
CLEARFIELD, PA 16830.
3. Plaintiff, PORTFOLIO RECOVERY ASSOCIATES, LLC, is the Assignee and Successor in  
Interest of Account #5467020002319757; 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 \$9,641.87. 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 \$9,641.87 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

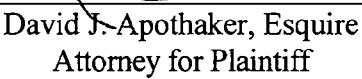
BY:   
David J. Apotheker, Esquire

Dated: 9/22/2008

Our File No. 172632

**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: 9/22/2008



/

PORTFOLIO RECOVERY ASSOCIATES, LLC

FREDERICK L STCLAIR  
10 WOOD AVE  
CLEARFIELD, PA 16830

STATEMENT OF ACCOUNT

Debtor's Name: FREDERICK L STCLAIR

Account Number: 5467020002319757

Original Creditor: HSBC

Balance Due: \$9,641.87

Our File No.: 172632

EXHIBIT "A"

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
NO: 08-1856-CD

PORTFOLIO RECOVERY ASSOCIATES, LLC  
vs  
FREDERICK L. STCLAIR

SERVICE # 1 OF 1

COMPLAINT

SERVE BY: 10/29/2008 HEARING: PAGE: 104729

DEFENDANT: FREDERICK L. STCLAIR  
ADDRESS: 10 WOOD AVE.  
CLEARFIELD, PA 16830

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT OCCUPIED

ATTEMPTS 10/17/08 P.M. v/H 10/29/08 N/L expired

**SHERIFF'S RETURN**

S  
**FILED**  
01/31/2009  
NOV 04 2008  
William A. Shaw  
Prothonotary/Clerk of Courts

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

COMPLAINT ON FREDERICK L. STCLAIR, 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 FREDERICK L. STCLAIR

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

NOW This 4th day, 10/2008 AT 3:19 AM / PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF **NOT FOUND** AS TO FREDERICK L. STCLAIR

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

TIME EXPIRED

So Answers: CHESTER A. HAWKINS, SHERIFF

BY: George T. Dehler Deputy Signature

George T. Dehler Print Deputy Name

SWORN TO BEFORE ME THIS

DAY OF 2008

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

PORTFOLIO RECOVERY ASSOCIATES,  
LLC  
 (Plaintiff)  
 c/o Apotheker & Associates, P.C.  
520 Fellowship Road C306  
 (Street Address)  
Mount Laurel, NJ 08054  
 (City, State, ZIP)

CIVIL ACTION

No. C8-1856-CDType of Case: CIVILType of Pleading: PLEADING

VS.

Filed on Behalf of:

FREDERICK L STCLAIR  
 (Defendant)  
10 WOOD AVE  
 (Street Address)  
CLEARFIELD, PA 16830  
 (City, State, ZIP)

PORTFOLIO RECOVERY ASSOCIATES,  
LLC  
 (Plaintiff)

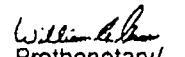
David J. Apotheker, Esq.  
Apotheker & Associates, P.C.  
 (Filed by)  
 520 Fellowship Road C306  
Mount Laurel, NJ 08054  
 (Address)  
800-672-0215  
 (Phone)

(Signature)

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

SEP 29 2008

Attest.

  
 Prothonotary/  
 Clerk of Courts

Cur File No.: 172532  
APCTHAKER & ASSOCIATES, P.C.  
BY: David J. Apothaker, Esquire, Esq.  
Attorney I.D.#38423  
520 Fellowship Road C305  
Mount Laurel, NJ 08054  
(800) 672-0215  
Attorneys for Plaintiff

---

PORTFOLIO RECOVERY  
ASSOCIATES, LLC  
c/c Apothaker & Associates, P.C.  
520 Fellowship Road C305  
Mount Laurel, NJ 08054  
Plaintiff,  
vs.  
FREDERICK L STCLAIR  
10 WOOD AVE  
CLEARFIELD, PA 16830  
Defendant.

) COURT OF COMMON PLEAS  
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COURT ADMINISTRATOR  
CLEARFIELD COUNTY COURTHOUSE  
SECOND & MARKET STREETS  
CLEARFIELD, PA 16830  
814-765-2641

Our File No.: 172632  
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

---

PORFOLIO RECOVERY	) COURT OF COMMON PLEAS
ASSOCIATES, LLC	) CLEARFIELD COUNTY
c/o Apothaker & Associates, P.C.	)
520 Fellowship Road C306	) NO.:
Mount Laurel, NJ 08054	)
Plaintiff,	)
vs.	)
FREDERICK L STCLAIR	)
10 WOOD AVE	)
CLEARFIELD, PA 16830	)
Defendant.	)

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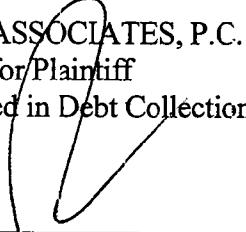
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FIRST COUNT**

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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 \$9,641.87. A true and correct copy of the total due and owing is attached hereto, made a part hereof and marked as Exhibit "A".
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APOTHAKER & ASSOCIATES, P.C.  
Attorney for Plaintiff  
A Law Firm Engaged in Debt Collection

BY:   
David J. Apotheker, Esquire

Dated: 9/22/2008

Our File No.: 172632

**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: 9/22/2008

PORTFOLIO RECOVERY ASSOCIATES, LLC

FREDERICK L STCLAIR  
10 WOOD AVE  
CLEARFIELD, PA 16830

STATEMENT OF ACCOUNT

Debtor's Name: FREDERICK L STCLAIR

Account Number: 5467020002319757

Original Creditor: HSBC

Balance Due: \$9,641.87

Our File No.: 172632

EXHIBIT "A"

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA  
CIVIL DIVISION

STACEY M. DONAHUE, : NO. 08-1869-CD  
Plaintiff :  
: :  
V. :  
: :  
NATHAN J. WONDERLING, :  
Defendant :  
:

**ORDER FOR MEDIATION CONFERENCE and PAYMENT OF COSTS**

NOW, this 3<sup>rd</sup> day of November, 2008, it is ORDERED that a Custody Mediation Conference be held before Allen H. Ryen, Ph.D., Licensed Child Psychologist.

It is further ORDERED that **EACH PARTY** to this action shall forthwith complete a Child Custody Mediation Questionnaire and forward the same to Dr. Ryen (416 Knarr Street, DuBois, Pennsylvania 15801) within Ten (10) days of receipt of this ORDER.

It is also ORDERED that the cost of said Mediation Conference shall be borne equally by the Plaintiff(s) and Defendant(s).

**Each party** (or counsel for the parties) shall deposit Two Hundred Fifty (\$250.00) Dollars (**money orders only**) made payable to the Clearfield County Treasurer and mailed to D. Peters, Judge's Chambers, 230 East Market Street, Clearfield, Pennsylvania 16830 within Twenty-Five (25) days of the date of this Order to proceed with the Mediation Conference "OR" submit a Custody Consent Order to the Court within Twenty-Five (25) days of the date of this Order foregoing the Mediation Conference.

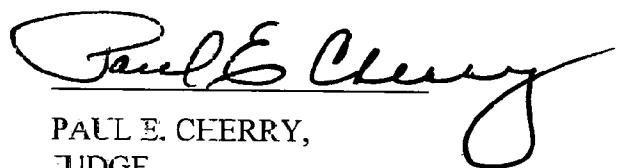
This Court shall issue a further ORDER scheduling the Mediation Conference when the required deposit has been received from all parties participating in this action.

FILED *2cc Atty Forcey*  
01/08/2009 *2cc Def.-*  
NOV 03 2008 *3116 1/2 Grant Road*  
S William A. Shaw *Ridgway, PA 15853*  
Prothonotary/Clerk of Courts *610*

If a Custody Consent Order is received by the Court after the Twenty-Fifth day following this Order and no later than \*\*\*SEVEN (7)\*\*\* days before scheduled Mediation Conference, then each party or counsel for the parties shall include Twenty (\$20.00) Dollars (money order only) in order to defray administrative/processing expense. In this event the amount of Two Hundred Fifty (\$250.00) Dollars previously deposited by each party shall be returned.

FAILURE OF A PARTY TO DEPOSIT THE REQUIRED FEE OF 'TWO HUNDRED FIFTY (\$250.00) DOLLARS' SHALL RESULT IN THE OFFENDING PARTY BEING SUBJECT TO CONTEMPT PROCEEDINGS BEFORE THE COURT.

BY THE COURT,



Paul E. Cherry

PAUL E. CHERRY,  
JUDGE

Attorney for the Plaintiff: Katherine M. Forcey, Esquire  
Attorney for the Defendant: Pro-Se

**FILED**

NOV 03 2008

William A. Shaw  
Prothonotary/Clerk of Courts

DATE: 11/3/08

You are responsible for serving all appropriate parties.

The Prothonotary's office has provided service to the following parties:

Plaintiff(s)  Plaintiff(s) Attorney  Other

Defendant(s)  Defendant(s) Attorney

\_\_\_\_ Special Instructions:

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104729  
NO: 08-1856-CD  
SERVICES 1  
COMPLAINT

PLAINTIFF: PORTFOLIO RECOVERY ASSOCIATES, LLC  
vs.  
DEFENDANT: FREDERICK L. STCLAIR

**SHERIFF RETURN**

**RETURN COSTS**

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	APOTHAKER	107016	10.00
SHERIFF HAWKINS	APOTHAKER	107016	18.00

5  
**FILED**  
010:50 am  
JAN 20 2009

William A. Shaw  
Prothonotary/Clerk of Courts

Sworn to Before Me This

So Answers,

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



Chester A. Hawkins  
Sheriff

Our File No.: 172632  
APOTHAKER & ASSOCIATES, P.C.  
BY: Benjamin J. Cavallaro, Esquire  
Attorney I.D.# 307949  
520 Fellowship Road C306  
Mount Laurel, NJ 08054  
(800) 672-0215  
Attorney for Plaintiff

7/1/2011 NO CC  
7/1/2011 6/29/2011 6/29/2011  
S. J. S. Clerk of Court

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PORTFOLIO RECOVERY ) COURT OF COMMON PLEAS  
ASSOCIATES, LLC ) CLEARFIELD COUNTY  
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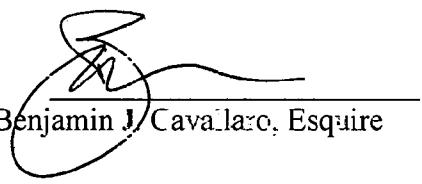
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**PRAECIPE TO DISMISS WITHOUT PREJUDICE**

TO THE PROTHONOTARY:

Kindly dismiss this action without prejudice.

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

By:   
\_\_\_\_\_  
Benjamin J. Cavallaro, Esquire

Dated: 6/29/2011

