

08-2212-CD  
Portfolio Rec. Assoc vs Dara L. Felker

138089

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

**FILED**

**NOV 17 2008**

PORTFOLIO RECOVERY ASSOCIATES,  
LLC

(Plaintiff)

c/o Apothaker & Associates, P.C.

520 Fellowship Road C306

(Street Address)

Mount Laurel, NJ 08054

(City, State, ZIP)

CIVIL ACTION

William A. Shaw  
Prothonotary/Clerk of Courts

No. 2008-2212-CD

Type of Case: CIVIL

Type of Pleading: PLEADING

VS.

Filed on Behalf of:

DARA L FELKER

(Defendant)

135 CHRISTINA ST

(Street Address)

RAMEY, PA 16671

(City, State, ZIP)

PORTFOLIO RECOVERY ASSOCIATES,  
LLC

(Plaintiff)

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.: 138089  
APOTHAKE & 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

|                                  |   |                       |
|----------------------------------|---|-----------------------|
| PORTFOLIO 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.                              | ) |                       |
| DARA L FELKER                    | ) |                       |
| 135 CHRISTINA ST                 | ) |                       |
| RAMEY, PA 16671                  | ) |                       |
| 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.: 138039  
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

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| PORTFOLIO 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.                              | ) |                       |
|                                  | ) |                       |
| DARA L FELKER                    | ) |                       |
| 135 CHRISTINA ST                 | ) |                       |
| RAMEY, PA 16671                  | ) |                       |
| Defendant.                       | ) |                       |

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 DARA L FELKER, an adult individual residing at 135 CHRISTINA ST RAMEY, PA 16671.
3. Plaintiff, PORTFOLIO RECOVERY ASSOCIATES, LLC, is the Assignee and Successor in Interest of Account #3500010142970; and said account was issued to Defendant(s) by DOMINION PEOPLES, 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 \$2,854.42. 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 \$2,854.42 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

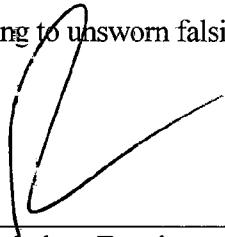
BY: \_\_\_\_\_  
David J. Apothaker, Esquire

Dated: 11/10/2008

Our File No.: 138089

**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.

A handwritten signature in black ink, appearing to be 'D. Apothaker', written over a horizontal line.

David J. Apothaker, Esquire  
Attorney for Plaintiff

DATE: 11/10/2008

PORTFOLIO RECOVERY ASSOCIATES, LLC

DARA L FELKER  
135 CHRISTINA ST  
RAMEY, PA 16671

STATEMENT OF ACCOUNT

|                    |                  |
|--------------------|------------------|
| Debtor's Name:     | DARA L FELKER    |
| Account Number:    | 3500010142970    |
| Original Creditor: | DOMINION PEOPLES |
| Balance Due:       | \$2,854.42       |

Our File No.: 138089

EXHIBIT "A"

**FILED**

**NOV 17 2008**

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



Our File No.: 138089  
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

PORTFOLIO RECOVERY  
ASSOCIATES, LLC

Plaintiff,

vs.

DARAL FELKER

Defendant.

) COURT OF COMMON PLEAS  
) CLEARFIELD COUNTY  
)  
)  
) NO. 2008-2212-CD  
)  
)  
)  
)

**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: December 8, 2008

**FILED**

DEC 18 2008

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-2212-CD

PORTFOLIO RECOVERY ASSOCIATES, LLC

vs

SERVICE # 1 OF 1

DARA L. FELKER

COMPLAINT

SERVE BY: 12/17/2008

HEARING:

PAGE: 104952

DEFENDANT: DARA L. FELKER  
ADDRESS: 135 CHRISTINA ST  
RAMEY, PA 16671

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT OCCUPIED

ATTEMPTS

12-4-08-10:54 AM N/H 12-15-08-2:00 PM N/H  
12-9-08-1:57 PM N/H 12-17-08-2:00 PM N/H

SHERIFF'S RETURN

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

COMPLAINT ON DARA L. FELKER, 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 DARA L. FELKER

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

NOW 12-18-08 AT 9:00 AM / PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF NOT FOUND AS TO DARA L. FELKER

REASON UNABLE TO LOCATE Nobody ever home, No Response

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

138089

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY  
PENNSYLVANIA

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

NOV 17 2008

PORTFOLIO RECOVERY ASSOCIATES,  
LLC

(Plaintiff)

c/o Apothaker & Associates, P.C.

520 Fellowship Road C306

(Street Address)

Mount Laurel, NJ 08054

(City, State, ZIP)

CIVIL ACTION

No. 2008-2212-CD

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Attest.

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

VS.

Filed on Behalf of:

DARA L FELKER

(Defendant)

135 CHRISTINA ST

(Street Address)

RAMEY, PA 16671

(City, State, ZIP)

PORTFOLIO RECOVERY ASSOCIATES,  
LLC

(Plaintiff)

David J. Apothaker, Esq.

Apothaker & Associates, P.C.

(Filed by)

520 Fellowship Road C306

Mount Laurel, NJ 08054

(Address)

800-672-0215

(Phone)

(Signature)



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APOTHAKE & ASSOCIATES, P.C.  
BY: David J. Apothaker, Esquire, Esq.  
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APOTHAKE & ASSOCIATES, P.C.  
Attorney for Plaintiff  
A Law Firm Engaged in Debt Collection

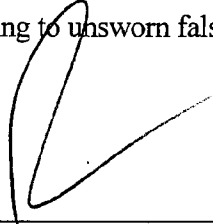
BY: \_\_\_\_\_  
David J. Apothaker, Esquire

Dated: 11/10/2008

Our File No.: 138089

**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.

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David J. Apothaker, Esquire  
Attorney for Plaintiff

DATE: 11/10/2008

PORTFOLIO RECOVERY ASSOCIATES, LLC

DARA L FELKER  
135 CHRISTINA ST  
RAMEY, PA 16671

STATEMENT OF ACCOUNT

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| Original Creditor: | DOMINION PECPLES |
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Our File No.: 138089

EXHIBIT "A"