

08-2266-CD
Asset Acceptance vs Carol Carlson

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

CIVIL ACTION -- (LAW) (EQUITY)

No. 2008-22160-CJ

Type of Case: Civil

Type of Pleading: Complaint in Civil Action

Asset Acceptance LLC

Assignee of HSBC CONSUMER LENDING (USA)

Plaintiff(s)

Filed on Behalf of: Plaintiff

v.

Counsel of Record for this Party:

CAROL CARLSON

Defendant(s)

Paul J. Klemm, Esquire
Nudelman, Nudelman, & Ziering, P.C.
425 Eagle Rock Avenue
Roseland, NJ 07068
973-618-0000 tel
973-618-0647 fax
Attorney ID # 92125

Dated: October 23, 2008

5
m 12:11 pm
NOV 24 2008
FILED
William A. Shaw
Prothonotary/Clerk of Courts
pd \$95.00 Atty
ICC Atty
ICC Shfl

**PAUL J. KLEMM, ESQUIRE
NUDELMAN, NUDELMAN, & ZIERING, P.C.
425 EAGLE ROCK AVENUE
ROSELAND, NJ 07068
973-618-0000
ID # 92125**

ATTORNEY FOR PLAINTIFF

Asset Acceptance LLC	:	CLEARFIELD COUNTY
Assignee of HSBC CONSUMER LENDING (USA):	:	
Plaintiff(s)	:	
v.	:	
	:	
CAROL CARLSON	:	
Defendant(s)	:	

COMPLAINT IN CIVIL ACTION

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, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

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.

DANIEL J. NELSON, COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
CLEARFIELD, PA 16830

AVISO

USTED HA SIDO DEMANDADO/A EN CORTE Si usted desea defenderse de las demandas que se presentan más adelante en las siguientes páginas, debe tomar acción dentro de los próximos veinte (20) días después de la notificación de esta Demanda y Avíos radicando personalmente o por medio de un abogado una comparecencia escrita y radicando en la Corte por escrito sus defensas de, y objeciones a, las demandas presentadas aquí en contra suya. Se le advierte de que si usted falla de tomar acción como se describe anteriormente, el caso puede proceder sin usted y un fallo por cualquier suma de dinero reclamada en la demanda o cualquier otra reclamación o remedio solicitado por el demandante puede ser dictado en contra suya por la Corte sin más aviso adicional. Usted puede perder dinero o propiedad u otros derechos importantes para usted.

USTED DEBE LLEVAR ESTE DOCUMENTO A SU ABOGADO INMEDIATAMENTE. SI USTED NO TIENE UN ABOGADO, LLAME O VAYA A LA SIGUIENTE OFICINA ESTA OFICINA PUEDE PROVEERLE INFORMACION A CERCA DE COMO CONSEGUIR UN ABOGADO.

SI USTED NO PUEDE PAGAR POR LOS SERVICIOS DE UN ABOGADO, ES POSIBLE QUE ESTA OFICINA LE PUEDA PROVEER INFORMACION SOBRE AGENCIAS QUE OFREZCAN SERVICIOS LEGALES SIN CARGO O BAJO COSTO A PERSONAS QUE CUALIFICAN.

DANIEL J. NELSON, COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
CLEARFIELD, PA 16830

**PAUL J. KLEMM, ESQUIRE
NUDELMAN, NUDELMAN, & ZIERING, P.C.
425 EAGLE ROCK AVENUE
ROSELAND, NJ 07068
973-618-0000
ID #92125**

ATTORNEY FOR PLAINTIFF

Asset Acceptance LLC : CLEARFIELD COUNTY
Assignee of HSBC CONSUMER LENDING (USA):

Plaintiff(s) :

v. :

CAROL CARLSON :
Defendant(s) :

COMPLAINT IN CIVIL ACTION

AND NOW, comes Plaintiff, Asset Acceptance LLC , As Assignee of HSBC CONSUMER LENDING (USA), by and through its attorney, Paul J. Klemm and the law offices of Nudelman, Nudelman & Ziering, P.C., and files the following **Complaint in Civil Action** and in support thereof aver as follows:

1. Plaintiff, Asset Acceptance LLC , is a corporation licensed to do business in the State of Pennsylvania.
2. Defendant, CAROL CARLSON, is an individual and citizen of the Commonwealth of Pennsylvania, who is believed to currently reside at , 450 DUBOIS AVE, DUBOIS PA 15801.
3. At the special insistence and request of the Defendant, Defendant was issued a credit card and / or line of credit by HSBC CONSUMER LENDING (USA), account number 71172300593079.

4. The Defendant is responsible for an unpaid balance in the amount of \$4,777.38 and interest in the amount of \$0.00.

5. Plaintiff, Asset Acceptance LLC, is the assignee of Defendant's HSBC CONSUMER LENDING (USA) account, account number 71172300593079.

6. The Defendant is liable to the Plaintiff, Asset Acceptance LLC as Assignee of Defendant's HSBC CONSUMER LENDING (USA) account in the amount of \$4,777.38.

7. Plaintiff has made demand to Defendant for \$4,777.38, but Defendant has willfully failed and/or refused to reimburse Plaintiff for the aforesaid sum due.

Wherefore, Plaintiff demands Judgment in its favor and against the Defendant in the amount of \$4,777.38, plus attorney fees of \$1,194.35 and interest from the date of breach, with continuing interest thereon at the legal rate from the date of Judgment plus anticipated court costs. The damages requested are less than the maximum amount for compulsory arbitration as set by the Court.

Respectfully Submitted:

NUDELMAN, NUDELMAN & ZIERING, P.C.



Paul J. Klemm, Esquire
425 Eagle Rock Avenue
Roseland, NJ 07068
(973) 618-0000

VERIFICATION

The undersigned, Paul J. Klemm, Esquire, hereby states that he is the attorney for Plaintiff in this action and verifies that the statements made in the foregoing pleading are true and correct to the best of his knowledge, information and belief. Counsel has signed this verification at the request of Plaintiff as a matter of time and convenience. Plaintiff has represented to counsel that there is a debt due and owing from Defendant to Plaintiff in the amount as set forth within the foregoing pleading. Plaintiff has provided counsel with all relevant information in order to allow counsel to sign this verification. Plaintiff agrees to provide a verification signed by Plaintiff upon request by Defendant. The undersigned understands that the statements herein are made subject to the penalties of 19 Pa.C.S.A Section 4904 relating to unsworn falsification to authorities.

Date: October 23, 2008



Paul J. Klemm, Esquire
Nudelman, Nudelman & Ziering, P.C.
425 Eagle Rock Avenue
Roseland, NJ 07068
(973) 618-0000

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
NO: 08-2266-CD

ASSET ACCEPTANCE LLC, ASSIGNEE
vs
CAROL CARLSON

SERVICE # 1 OF 1

COMPLAINT

SERVE BY: 12/24/2008 HEARING: PAGE: 104971

DEFENDANT: CAROL CARLSON
ADDRESS: 450 DUBOIS AVE.
DUBOIS, PA 15801

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT

S FILED
034361
DEC 16 2008
S

William A. Shaw
Prothonotary/Clerk of Courts

OCCUPIED

ATTEMPTS

SHERIFF'S RETURN

NOW, 12-2-08 AT 11:25 AM SERVED THE WITHIN

COMPLAINT ON CAROL CARLSON, DEFENDANT

BY HANDING TO Carol Carlson, Defendant

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

ADDRESS SERVED 450 DUBOIS AVE DUBOIS, PA 15801

NOW _____ AT _____ AM / PM POSTED THE WITHIN

COMPLAINT FOR CAROL CARLSON

AT (ADDRESS) _____

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

I MAKE RETURN OF **NOT FOUND** AS TO CAROL CARLSON

REASON UNABLE TO LOCATE _____

SWORN TO BEFORE ME THIS

____ DAY OF 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY: Mark A. Courrier
Deputy Signature

Mark A. Courrier
Print Deputy Name

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104971
NO: 08-2266-CD
SERVICES 1
COMPLAINT

PLAINTIFF: ASSET ACCEPTANCE LLC, ASSIGNEE
vs.
DEFENDANT: CAROL CARLSON

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	NUDELMAN	031546	10.00
SHERIFF HAWKINS	NUDELMAN	031546	40.23

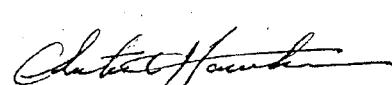
5
FILED
010:45pm
MAR 24 2009

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

So Answers,

Day of 2008



Chester A. Hawkins
Sheriff

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

ASSET ACCEPTANCE, LLC, et al

* NO. 2008-2266-CD

Plaintiffs

*

vs.

*

CAROL CARLSON

*

Defendant

*

ORDER

NOW, this 2nd day of August, 2013, upon the Court's review of the docket and noting no activity for a period of over four years, it is the ORDER of this Court that the case be moved to inactive status. The Prothonotary shall code the case in Full Court as Z-INACTA.

BY THE COURT,



FREDRIC J. AMMERMAN
President Judge

5 FILED ^{No. 2266}
01/10/2013 cm
2 AUG 06 2013
William A. Shaw
Prothonotary/Clerk of Courts
6K