

08-2378-CD  
LVNV Funding vs Karen Demko

189984

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

LVNV FUNDING LLC

(Plaintiff)

c/o Apothaker & Associates, P.C.

520 Fellowship Road C306

(Street Address)

Mount Laurel, NJ 08054

(City, State, ZIP)

CIVIL ACTION

No. 08-2378-CD

Type of Case: CIVIL

Type of Pleading: PLEADING

VS.

Filed on Behalf of:

KAREN DEMKO

(Defendant)

805 EDWARDS ALY

(Street Address)

OSCEOLA MILLS, PA 16666-1011

(City, State, ZIP)

LVNV FUNDING

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)

**FILED** ICC Atty  
DEC 11 2008 ICC Sheriff  
William A. Shaw  
Prothonotary/Clerk of Courts  
Atty fee \$95.00



Our File No.: 189984  
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

LVNV FUNDING LLC  
c/o Apothaker & Associates, P.C.  
520 Fellowship Road C306  
Mount Laurel, NJ 08054

Plaintiff,

vs.

KAREN DEMKO  
805 EDWARDS ALY  
OSCEOLA MILLS, PA 16666-1011  
Defendant.

) COURT OF COMMON PLEAS  
) CLEARFIELD COUNTY

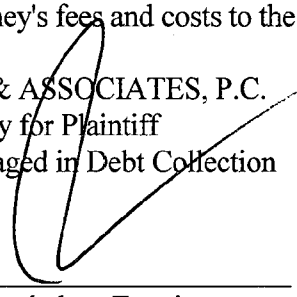
) NO.:

CIVIL ACTION COMPLAINT  
FIRST COUNT

1. Plaintiff is LVNV FUNDING LLC c/o Apothaker & Associates, P.C., 520 Fellowship Road C306, Mount Laurel, NJ 08054.
2. Defendant(s) is/are KAREN DEMKO, an adult individual residing at 805 EDWARDS ALY OSCEOLA MILLS, PA 16666-1011.
3. Plaintiff, LVNV FUNDING LLC, is the Assignee and Successor in Interest of Account #4185866344304731; and said account was issued to Defendant(s) by WASHINGTON MUTUAL, 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 \$3,498.30. 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 \$3,498.30 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

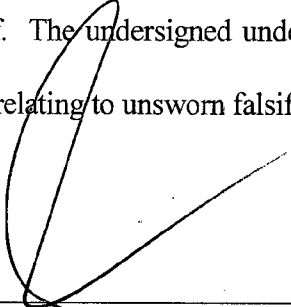
BY:   
David J. Apothaker, Esquire

Dated: 12/2/2008

Our File No.: 189984

## 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: 12/2/2008

LVNV FUNDING LLC

KAREN DEMKO  
805 EDWARDS ALY  
OSCEOLA MILLS, PA 16666-1011

STATEMENT OF ACCOUNT

Debtor's Name:	KAREN DEMKO.
Account Number:	4185866344304731
Original Creditor:	WASHINGTON MUTUAL
Balance Due:	\$3,498.30

Our File No.: 189984

EXHIBIT "A"

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-2378-CD

LVNV FUNDING LLC

VS

KAREN DEMKO

SERVICE # 1 OF 1

COMPLAINT

SERVE BY: 01/10/2009

HEARING:

PAGE: 105051

DEFENDANT:

KAREN DEMKO

ADDRESS:

805 EDWARDS ALY

OSCEOLA MILLS, PA 16666-1011

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

OCCUPIED

ATTEMPTS

Apt - Empty

**SHERIFF'S RETURN**

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

COMPLAINT ON KAREN DEMKO, 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 KAREN DEMKO

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

NOW 1-12-09 AT 1030 (6) AM / PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF **NOT FOUND** AS TO KAREN DEMKO

REASON UNABLE TO LOCATE NOT FOUND

SWORN TO BEFORE ME THIS

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

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

[Signature]  
Deputy Signature

S. Hunter  
Print Deputy Name

**FILED**  
013:24601  
JAN 14 2009  
William A. Shaw  
Prothonotary/Clerk of Courts



COURT OF COMMON PLEAS OF CLEARFIELD COUNTY  
PENNSYLVANIA

LVNV FUNDING LLC

(Plaintiff)

c/o Apothaker & Associates, P.C.

520 Fellowship Road C306

(Street Address)

Mount Laurel, NJ 08054

(City, State, ZIP)

CIVIL ACTION

No. 08-2378-CD

Type of Case: CIVIL

Type of Pleading: PLEADING

VS.

Filed on Behalf of:

KAREN DEMKO

(Defendant)

805 EDWARDS ALY

(Street Address)

OSCEOLA MILLS. PA 16666-1011

(City, State, ZIP)

LVNV FUNDING

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)

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

DEC 11 2008

Attest.

*William B. Shaw*  
Prothonotary/  
Clerk of Courts

Our File No.: 189984  
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

LVNV FUNDING LLC	)	COURT OF COMMON PLEAS
c/o Apothaker & Associates, P.C.	)	CLEARFIELD COUNTY
520 Fellowship Road C306	)	
Mount Laurel, NJ 08054	)	NO.:
Plaintiff,	)	
vs.	)	
	)	
KAREN DEMKO	)	
805 EDWARDS ALY	)	
OSCEOLA MILLS, PA 16666-1011	)	
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.: 189984  
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

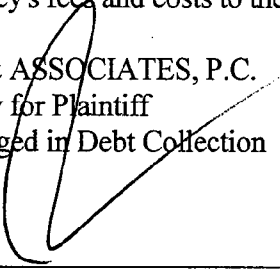
LVNV FUNDING LLC	)	COURT OF COMMON PLEAS
c/o Apothaker & Associates, P.C.	)	CLEARFIELD COUNTY
520 Fellowship Road C306	)	
Mount Laurel, NJ 08054	)	NO.:
Plaintiff,	)	
vs.	)	
	)	
KAREN DEMKO	)	
805 EDWARDS ALY	)	
OSCEOLA MILLS, PA 16666-1011	)	
Defendant.	)	
	)	

CIVIL ACTION COMPLAINT  
**FIRST COUNT**

1. Plaintiff is LVNV FUNDING LLC c/o Apothaker & Associates, P.C., 520 Fellowship Road C306, Mount Laurel, NJ 08054.
2. Defendant(s) is/are KAREN DEMKO, an adult individual residing at 805 EDWARDS ALY, OSCEOLA MILLS, PA 16666-1011.
3. Plaintiff, LVNV FUNDING LLC, is the Assignee and Successor in Interest of Account #4185866344304731; and said account was issued to Defendant(s) by WASHINGTON MUTUAL, 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 \$3,498.30. 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 \$3,498.30 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

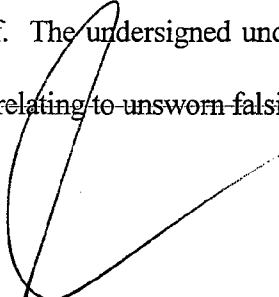
BY:   
David J. Apothaker, Esquire

Dated: 12/2/2008

Our File No.: 189984

**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: 12/2/2008

LVNV FUNDING LLC

KAREN DEMKO  
805 EDWARDS ALY  
OSCEOLA MILLS, PA 16666-1011

STATEMENT OF ACCOUNT

---

Debtor's Name: KAREN DEMKO

Account Number: 4185866344304731

Original Creditor: WASHINGTON MUTUAL

Balance Due: \$3,498.30

Our File No.: 189984

EXHIBIT "A"

**FILED**

**JAN 14 2009**

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

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 105051  
NO: 08-2378-CD  
SERVICES 1  
COMPLAINT

PLAINTIFF: LVNV FUNDING LLC  
vs.  
DEFENDANT: KAREN DEMKO

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	APOTHA'KER	113344	10.00
SHERIFF HAWKINS	APOTHA'KER	113344	36.00

5  
**FILED**  
03:36 PM  
MAR 26 2009  
William A. Shaw  
Prothonotary/Clerk of Courts

Sworn to Before Me This

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

So Answers,



Chester A. Hawkins  
Sheriff



Our File No. 189984  
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/11:52am  
DEC - 3 2010 Apothaker

William A. Shaw  
Prothonotary/Clerk of Courts

LVNV FUNDING LLC	)	COURT OF COMMON PLEAS
	)	CLEARFIELD COUNTY
vs.	)	
KAREN DEMKO	)	NO. 08-2378-CD
	)	
Defendant.	)	

**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: 11/24/2010



\* Q 1 8 9 9 8 4 D I S N 1 - \*