

08-2378-CD
LVNV Funding vs Karen Denko

**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 11/26/08
DEC 11 2008
William A. Shaw
Prothonotary/Clerk of Courts
ICC Atty
ICC Sheriff
Atty Pd. \$95.00

Our File No.: 189984

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

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.:
)
)
)
)
)
)
)
)
)
)

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
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

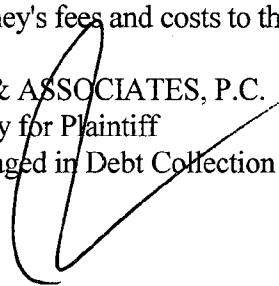
LVNV FUNDING LLC) COURT OF COMMON PLEAS
c/o Apothaker & Associates, P.C.) CLEARFIELD COUNTY
520 Fellowship Road C306)
Mount Laurel, NJ 08054) NO.:
Plaintiff,)
vs.)
KAREN DEMKO)
805 EDWARDS ALY)
OSCEOLA MILLS, PA 16666-1011)
Defendant.)
)

**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.

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

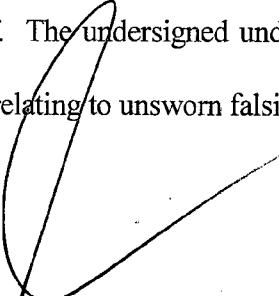
BY: 
David J. Apothaker, Esquire

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

5 FILED

01/31/2009
JAN 14 2009
LM

William A. Shaw
Prothonotary/Clerk of Courts

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 10:30 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:

Deputy S. Hunter
Deputy Signature

S. Hunter
Print Deputy Name

**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 L. Glass
Prothonotary/
Clerk of Courts

Our File No.: 189984
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

LVNV FUNDING LLC) COURT OF COMMON PLEAS
c/o Apotheker & 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
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

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.

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

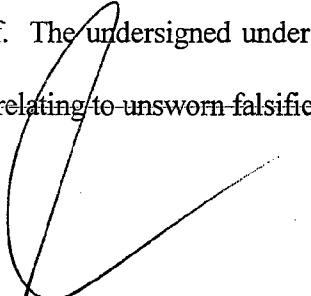
BY: _____
David J. Apothaker, Esquire

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	APOTHAKER	113344	10.00
SHERIFF HAWKINS	APOTHAKER	113344	36.00

S
FILED
93:3605H
MAR 26 2009
William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

So Answers,

____ Day of _____ 2009



Chester A. Hawkins
Sheriff

Our File No.: 189984
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

S **FILED** ICC Atty
m/11/52am Apothaker
DEC - 3 2010

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.

APOTHAKER & 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 - *