

08-2433-CD

Arrow Fin. Vs Robin Graham

190949

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

**FILED**

DEC 22 2008

m 1:55 pm

William A. Shaw  
Prothonotary/Clerk of Courts

CERT TO SHENK-  
d

Amv

ARROW FINANCIAL SERVICES LLC

(Plaintiff)

c/o Apothaker & Associates, P.C.

520 Fellowship Road C306

(Street Address)

Mount Laurel, NJ 08054

(City, State, ZIP)

CIVIL ACTION

No. 2008-2433-CD

Type of Case: CIVIL

Type of Pleading: PLEADING

VS.

Filed on Behalf of:

ROBIN GRAHAM

(Defendant)

3545 OLD ERIE PIKE

(Street Address)

WEST DECATUR, PA 16878-8212

(City, State, ZIP)

ARROW FINANCIAL SERVICES

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.: 190949  
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

ARROW FINANCIAL SERVICES LLC	)	COURT OF COMMON PLEAS
c/o Apothaker & Associates, P.C.	)	CLEARFIELD COUNTY
520 Fellowship Road C306	)	
Mount Laurel, NJ 08054	)	NO.:
Plaintiff,	)	
vs.	)	
	)	
ROBIN GRAHAM	)	
3545 OLD ERIE PIKE	)	
WEST DECATUR, PA 16873-8212	)	
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.: 190949  
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

ARROW FINANCIAL SERVICES LLC	)	COURT OF COMMON PLEAS
c/o Apothaker & Associates, P.C.	)	CLEARFIELD COUNTY
520 Fellowship Road C306	)	
Mount Laurel, NJ 08054	)	NO.:
Plaintiff,	)	
vs.	)	
	)	
ROBIN GRAHAM	)	
3545 OLD ERIE PIKE	)	
WEST DECATUR, PA 16878-8212	)	
Defendant.	)	
	)	

CIVIL ACTION COMPLAINT  
FIRST COUNT

1. Plaintiff is ARROW FINANCIAL SERVICES LLC c/o Apothaker & Associates, P.C., 520 Fellowship Road C306, Mount Laurel, NJ 08054.
2. Defendant(s) is/are ROBIN GRAHAM, an adult individual residing at 3545 OLD ERIE PIKE WEST DECATUR, PA 16878-8212.
3. Plaintiff, ARROW FINANCIAL SERVICES LLC, is the Assignee and Successor in Interest of Account #0222601100985180; and said account was issued to Defendant(s) by HOUSEHOLD BANK, 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 \$3,486.07. 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 \$3,486.07 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

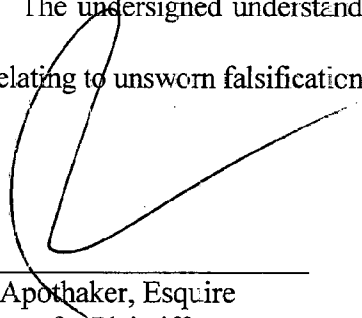
BY: \_\_\_\_\_  
David J. Apothaker, Esquire

Dated: 12/16/2008

Our File No.: 190949

**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: 12/16/2008

ARROW FINANCIAL SERVICES LLC

ROBIN GRAHAM  
3545 OLD ERIE PIKE  
WEST DECATUR, PA 16878-8212

STATEMENT OF ACCOUNT

Debtor's Name:	ROBIN GRAHAM
Account Number:	0222601100985180
Original Creditor:	HOUSEHOLD BANK
Balance Due:	\$3,486.07

Our File No.: 190949

EXHIBIT "A"

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-2433-CD

ARROW FINANCIAL SERVICES LLC

vs

ROBIN GRAHAM

SERVICE # 1 OF 1

COMPLAINT

SERVE BY: 01/21/2009

HEARING:

PAGE: 105085

DEFENDANT:

ROBIN GRAHAM

ADDRESS:

3545 OLD ERIE PIKE

WEST DECATUR, PA 16878-8212

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

OCCUPIED

ATTEMPTS

SHERIFF'S RETURN

NOW, 12-29-08 AT 1002 AM/PM SERVED THE WITHIN

COMPLAINT ON ROBIN GRAHAM, DEFENDANT

BY HANDING TO ~~3545 Old Erie~~ Robin Graham, self

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

ADDRESS SERVED 3545 Old Erie Pike West Decatur Pa

NOW \_\_\_\_\_ AT \_\_\_\_\_ AM / PM POSTED THE WITHIN

COMPLAINT FOR ROBIN GRAHAM

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

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

I MAKE RETURN OF **NOT FOUND** AS TO ROBIN GRAHAM

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

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

5  
**FILED**  
01/31/2009  
DEC 29 2008  
William A. Shaw  
Prothonotary/Clerk of Courts



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 105085  
NO: 08-2433-CD  
SERVICES 1  
COMPLAINT

PLAINTIFF: ARROW FINANCIAL SERVICES LLC  
vs.  
DEFENDANT: ROBIN GRAHAM

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	APOTHAKE	114632	10.00
SHERIFF HAWKINS	APOTHAKE	114632	30.87

5  
013.35 cm  
MAR 25 2009  
William A. Shaw  
Prothonotary/Clerk of Courts

Sworn to Before Me This

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

So Answers,

*Chester A. Hawkins*

Chester A. Hawkins  
Sheriff

Our File No.: 190949  
APOTHAKE & ASSOCIATES, P.C.  
BY: David J. Apothaker  
Attorney I.D.# 38423  
520 Fellowship Road C306  
Mount Laurel, NJ 08054  
(800) 672-0215

Attorney for Plaintiff

ARROW FINANCIAL SERVICES LLC  
Plaintiff,

vs.

ROBIN GRAHAM

Defendant.

) COURT OF COMMON PLEAS OF  
) CLEARFIELD COUNTY

) NO.: 2008-2433-CD

) Civil Action

**PRAECIPE FOR DEFAULT JUDGMENT**

TO THE PROTHONOTARY:

Kindly enter judgment against Defendant, ROBIN GRAHAM, in the default of an Answer, in the amount of

\$3,678.06 computed as follows:

Amount claimed in complaint:	\$3,486.07
Amount Paid:	- \$(0.00)
Interest from December 16, 2008 to 04/29/09 at the legal interest rate of 6.000 per annum	\$56.12
Costs	\$135.87
Attorney fees	\$0.00

TOTAL \$3,678.06

I hereby certify that the appropriate Notices of Default, as attached have been mailed in accordance with  
Pa.R.Civ.P. 237.1 on the dates indicated on the Notices.

I certify Defendant, ROBIN GRAHAM, last know address is 3545 OLD ERIE PIKE WEST DECATUR, PA  
16878-8212.

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

By:

David J. Apothaker

Dated: 4/29/2009

5  
**FILED** Att'y pd. 20.00  
MAY 07 2009  
William A. Shaw  
Prothonotary/Clerk of Courts  
rec'd Notice to Def.  
ICC to Att'y

Our File No.: 190949  
APOTHAKER & ASSOCIATES, P.C.  
BY: David J. Apothaker  
Attorney I.D.# 38423  
520 Fellowship Road C306  
Mount Laurel, NJ 08054  
(800) 672-0215  
Attorney for Plaintiff

ARROW FINANCIAL SERVICES	)	COURT OF COMMON PLEAS OF
LLC	)	CLEARFIELD COUNTY
	)	
Plaintiff,	)	
vs.	)	NO.: 2008-2433-CD
	)	
ROBIN GRAHAM	)	Civil Action
	)	
Defendant.	)	

**AFFIDAVIT OF NON-MILITARY SERVICE**

COMMONWEALTH OF PENNSYLVANIA :  
: SS.  
COUNTY OF CLEARFIELD :

David J. Apothaker, being duly sworn according to law, deposes and says that I am the attorney for Plaintiff, and authorized to make this affidavit; that Defendant(s) resides at 3545 OLD ERIE PIKE WEST DECATUR, PA 16878-8212.

We inquired with the web site of the Defense Manpower Data Center, located at 1600 Wilson Boulevard, Suite 400, Arlington, VA 22209-2593, if the Defendant(s) is/are in any branch of the military.

Mary M. Snavelly-Dixon, Director of the Defense Manpower Data Center has sent back our inquiry indicated that the Defendant(s) is/are not in the military.

\_\_\_\_\_  
David J. Apothaker  
Attorney for Plaintiff

The above signed understands that the statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.



Military Status Report  
Pursuant to the Servicemembers Civil Relief Act

< Last Name	First/Middle	Begin Date	Active Duty Status	Service/Agency
GRAHAM	ROBIN	Based on the information you have furnished, the DMDC does not possess any information indicating that the individual is currently on active duty.		

Upon searching the information data banks of the Department of Defense Manpower Data Center, based on the information that you provided, the above is the current status of the individual as to all branches of the Military.

*Mary M. Snively-Dixon*

Mary M. Snively-Dixon, Director  
Department of Defense - Manpower Data Center  
1600 Wilson Blvd., Suite 400  
Arlington, VA 22209-2593

The Defense Manpower Data Center (DMDC) is an organization of the Department of Defense that maintains the Defense Enrollment and Eligibility Reporting System (DEERS) database which is the official source of data on eligibility for military medical care and other eligibility systems.

The Department of Defense strongly supports the enforcement of the Servicemembers Civil Relief Act [50 USCS Appx. §§ 501 et seq] (SCRA) (formerly the Soldiers' and Sailors' Civil Relief Act of 1940). DMDC has issued hundreds of thousands of "does not possess any information indicating that the individual is currently on active duty" responses, and has experienced a small error rate. In the event the individual referenced above, or any family member, friend, or representative asserts in any manner that the individual is on active duty, or is otherwise entitled to the protections of the SCRA, you are strongly encouraged to obtain further verification of the person's active duty status by contacting that person's Military Service via the "defenseink.mil" URL provided below. If you have evidence the person is on active-duty and you fail to obtain this additional Military Service verification, provisions of the SCRA may be invoked against you.

If you obtain further information about the person ( e.g., an SSN, improved accuracy of DOB, a middle name), you can submit your request again at this Web site and we will provide a new certificate for that query.

This response reflects current active duty status only. For historical information, please contact the Military Service SCRA points-of-contact.

See: <http://www.defenselink.mil/faq/pis/PC09SLDR.html>

WARNING: This certificate was provided based on a name and Social Security number (SSN) provided by the requester. Providing an erroneous name or SSN will cause an erroneous certificate to be provided.

Report ID: BLIFHNPLDB

**OFFICE OF THE PROTHONOTARY  
COURT OF COMMON PLEAS  
CLEARFIELD COUNTY**

ARROW FINANCIAL SERVICES LLC

vs.

ROBIN GRAHAM

) COURT OF COMMON PLEAS  
) CLEARFIELD COUNTY  
)  
)  
) NO. 2008-2433-CD  
)

To: ROBIN GRAHAM  
3545 OLD ERIE PIKE  
WEST DECATUR, PA 16878-8212

**NOTICE, RULE 237.5**

**NOTICE OF PRAECIPE TO ENTER JUDGMENT BY DEFAULT**

Date of Notice: April 02, 2009

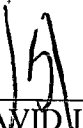
**IMPORTANT NOTICE**

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS.

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.

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

  
\_\_\_\_\_  
DAVID J. APOTHAKE, ESQUIRE  
APOTHAKE & ASSOCIATES, PC  
A Law Firm Engaged in Debt Collection  
520 Fellowship Road C306  
Mount Laurel, NJ 08054  
(800) 672-0215  
Attorney for Plaintiff  
Attorney ID #38423

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-2433-CD

ARROW FINANCIAL SERVICES LLC

VS

ROBIN GRAHAM

SERVICE # 1 OF 1

COMPLAINT

COPY

SERVE BY: 01/21/2009

HEARING:

PAGE: 105085

DEFENDANT:

ROBIN GRAHAM

ADDRESS:

3545 OLD ERIE PIKE

WEST DECATUR, PA 16878-8212

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

OCCUPIED

ATTEMPTS

SHERIFF'S RETURN

NOW, 12-29-08 AT 1002 AM / PM SERVED THE WITHIN

COMPLAINT ON ROBIN GRAHAM, DEFENDANT

BY HANDING TO

~~3545 Old Erie~~ Robin Graham, self

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

ADDRESS SERVED

3545 Old Erie Pike West Decatur Pa

NOW \_\_\_\_\_ AT \_\_\_\_\_ AM / PM POSTED THE WITHIN

COMPLAINT FOR ROBIN GRAHAM

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

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

I MAKE RETURN OF NOT FOUND AS TO ROBIN GRAHAM

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

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

COPY

OFFICE OF THE PROTHONOTARY  
COURT OF COMMON PLEAS

TO: ROBIN GRAHAM  
3545 OLD ERIE PIKE  
WEST DECATUR, PA 16878-8212

ARROW FINANCIAL SERVICES LLC	)	COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
	)	
Plaintiff,	)	
vs.	)	NO.: 2008-2433-CD
	)	
ROBIN GRAHAM	)	Civil Action
	)	
Defendant.	)	

NOTICE

Pursuant to Rule 236 of the Supreme Court of Pennsylvania, you are hereby notified that a Judgment has been entered against you in the above proceeding as indicated below.

- ☒ JUDGMENT BY DEFAULT
- ☐ JUDGMENT IN REPLEVIN
- ☐ JUDGMENT BY CONFESSION
- ☐ JUDGMENT FOR POSSESSION
- ☐ JUDGMENT ON AWARD OF ARBITRATORS
- ☐ JUDGMENT ON VERDICT
- ☐ JUDGMENT ON COURT FINDINGS
- ☐ JUDGMENT ON WRIT OF REVIVAL

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE, PLEASE CALL:

ATTORNEY David J. Apothaker, Esq. at this telephone number: 215-634-8920

*William L. Shaw* 5/11/09