

00-716-CD
GREENWOOD TRUST COMPANY et al -vs- LENNY HAWKINS

Our File No. 098385
ATTORNEYS FOR PLAINTIFF
ERIC M. BERMAN, P.C.
BY: Eric M. Berman, Esquire, I.D. 83698
BY: Paul M. Schofield, Jr., Esquire, I.D. 81894
198 Allendale Road, Suite 402
King of Prussia, PA 19406
(610) 265-7720

COURT OF COMMON PLEAS
COUNTY OF CLEARFIELD

GREENWOOD TRUST COMPANY, BY IT'S AGENT
DISCOVER FINANCIAL SERVICES, INC.
c/o ERIC M. BERMAN, P.C.
198 Allendale Road, Suite 402
King of Prussia, PA 19406

FILED

TRIAL DIVISION
CIVIL ACTION

vs.

JUN 16 2000

Term, 1997

No. 00-716-60

63 LENNY HAWKINS

William A. Shaw
Prothonotary

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 this complaint or for any other claim or relief required 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 OR FIND OUT WHERE YOU CAN GET LEGAL HELP.

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plaza al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. A demas la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGA O SO NO TIENE EL DINERO SUFFICIENTE DE PAGAR TAL SERVICIO. VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

LAWYER REFERRAL SERVICE, COUNTY OF CLEARFIELD BAR ASSOCIATION

Address: CLEARFIELD COUNTY COURTHOUSE, CLEARFIELD, PA 16830 Tel.: 800-692-7327

Our File No. 088385
ATTORNEYS FOR PLAINTIFF
ERIC M. BERMAN, P.C.
BY: Eric M. Berman, Esquire, I.D. 83698
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198 ALLENDALE ROAD, SUITE 402
KING OF PRUSSIA, PA 19406
(610) 265-7720

| | |
|--|--------------------------|
| -----X----- | COURT OF COMMON PLEAS |
| -----:----- | COUNTY OF CLEARFIELD |
| GREENWOOD TRUST COMPANY, BY IT'S AGENT | |
| DISCOVER FINANCIAL SERVICES, INC. | |
| c/o ERIC M. BERMAN, P.C. | -----:----- CIVIL ACTION |
| 198 Allendale Road, Suite 402 | -----:----- Term, 1997 |
| King of Prussia, PA 19406 | -----:----- No. |
| vs. | -----:----- |
| LENNY HAWKINS | -----:----- |
| -----X----- | |

• COMPLAINT

1060 - Contracts for Goods, Enforcement of Accounts

1. Plaintiff, GREENWOOD TRUST COMPANY, BY IT'S AGENT DISCOVER FINANCIAL SE is a DELAWARE BUSINESS TRUST licensed to do business in the Commonwealth of Pennsylvania with its place of business at 3311 MILL MEADOW DR., HILLIARD, OH 43206-MARCH 08, 2000.

2. The Defendant(s), LENNY HAWKINS resides at 513 GEORGE ST. , HOUTZDALE, PA 16651-0000.

3. There is due from the Defendant(s) the sum of \$3,622.14 for credit extended by Plaintiff to Defendant(s), acct. no. 6011002491533832, and which such credit was drawn and used by the Defendant(s). Defendant(s) is in default for failure to make payments for such use.

4. The Plaintiff has made demand upon the Defendant(s) for payment of monies in the sum of \$3,622.14 advanced to Defendant(s) through Defendant(s) use of the above-referenced credit account, but Defendant(s) has failed and refused to pay the said sum or any part thereof.

5. All applicable credits, if any, have been duly applied to Defendant(s) credit account.

WHEREFORE, Plaintiff claims of the Defendant(s) the sum of \$3,622.14 plus interest, attorneys fees and costs which are justly due and owing from the Defendant(s) to the Plaintiff.

Dated: MARCH 08, 2000

ERIC M. BERMAN, P.C.

BY:

PAUL M. SCHOFIELD, JR., ESQUIRE

SPACE-AQ

BY:

ERIC M. BERMAN, ESQUIRE

Attorneys for Plaintiff

VERIFICATION

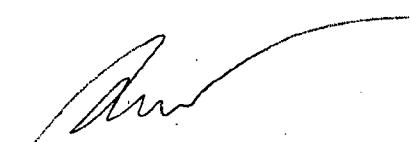
PAUL M. SCHOFIELD, JR., ESQUIRE, being duly sworn according to law, deposes and says that he is associated with the Law Firm of Eric M. Berman, P.C., and/or ERIC M. BERMAN, ESQUIRE, being duly sworn according to law, deposes and says that he is the Principal attorney of Eric M. Berman, P.C., attorneys for the Plaintiff, and as said attorney, he is authorized to take this verification on its behalf, and that the facts in the Complaint as set forth therein are true and correct to the best of his knowledge, information and belief.

I verify that the statements made in the within instrument are true and correct. I understand that false statements are subject to the penalties of 18 Pa.C.S.A. Section 4904 relating to unsworn falsifications to authorities.



ERIC M. BERMAN, ESQUIRE

Dated: MARCH 08, 2000



PAUL M. SCHOFIELD, JR., ESQUIRE

SPACE-A6

88385

Novus Services
August 16, 1999

DSPA07

DS

Record Type: 1
Account No.: 6011002491533832
Debtor 1: LENNY HAWKINS
Debtor 2:
Street: 513 GEORGE ST
City: HOUTZDALE
State: PA
Zip Code: 16651
Work Phone: (814) 378-4709
Work Phone: (000) 000-0000
S.S.N.: 190-46-8579
Account Open Date: 11/94
Current Balance: 3622.14
Line of Credit: 4500
Cash Advance: 301
Last Pay Date: 12/18/98
Charge Off (Interest) Date: 07/31/99
External Status: Z
Brand Type: D , \$\$ PROP VALUE|\$31000.00| SLUNA1 3:11 |
Miscellaneous: 6011 0024 9153 3832
CARDMEMBER STATEMENT 09:26:50 08/04/99
HAWKINS, LENNY CLOSING DATE: 07/10/99
VIEW DATE: 07 / 99
CREDIT LIMIT: 4500
PAYMENT DUE DATE: 08/04/99
PREVIOUS BALANCE: 3529.07
CREDIT AVAIL: 0
MIN PAYMENT DUE: 558.00
PAYMENTS/CREDITS: - 0.00-
AMOUNT PAST DUE: 482.00
PURCHASES/MISC: + 29.00
MULTIPLE STATEMENTS CASH ADVANCES: + 0.00
BALANCE TRANSFERS + 0.00
FINANCE CHARGES: + 64.07
NEW BALANCE: = 3622.14

OTHER/MISCELLANEOUS 07/10 LATE FEE 29.00

B = Bravo

P = Private Issue

D = Discover Card

ATTORNEY: BERMAN
6011 0024 9153 3832

BALANCE: \$3622.14
CARDMEMBER(S): HAWKINS, LENNY

STATE OF OHIO
COUNTY OF FRANKLIN

Russ Coffill, personally appeared before me, this day and after being duly sworn, according to law, upon her oath and says:

THAT she is the Legal Representative for **DISCOVER CARD**, an affiliate of GREENWOOD TRUST COMPANY, a corporation duly organized and existing under and by virtue of the laws of the State of: Delaware.

THAT their capacity as Legal Representative Affiant has control over and access to all records regarding the account of this debtor; further that the Affiant has personally inspected said account and statements regarding the balance due on said account. These Records are kept in the normal course of business.

THAT the undersigned Affiant being duly sworn deposes and says that there has not been a knowing violation of the State Consumer and Credit Laws regarding this transaction.

THAT the annexed statement of account, in favor of GREENWOOD TRUST COMPANY, is a true and correct statement and there is now due and owing to GREENWOOD TRUST COMPANY, the sum over and above all legal set-offs. 'Attached' hereto as exhibit A is a copy of the terms of the account which we forwarded with the charge card to the Cardmember(s).

THAT to the best of Affiant's knowledge and belief the defendant is employed in civilian life and by reason thereof is not engaged in the military service of the United States and is a resident of the State and of the Country in which this action has been filed.

THAT this affidavit is made on the basis of Affiant's personal knowledge and in support of Plaintiff's suit on account against said Debtor.

Kimberly A. Fobes
NOTARY PUBLIC, STATE OF OHIO
MY COMMISSION EXPIRES 03-28-04

R. M. Fobes
Affiant

Sworn and Subscribed before me
this 4TH day of AUGUST, 1999

Kimberly A. Fobes
NOTARY



REC'D
FILED

REC'D JUN 16 2000

*M. R. Berman, Pro. \$80.00
William A. Shaw
Prothonotary
JCC Sherry*

PAUL M. SCHOFIELD

(2)

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

GREENWOOD TRUST COMPANY, BY
VS
HAWKINS, LENNY

00-716-CD

COMPLAINT

SHERIFF RETURNS

NOW JULY 12, 2000 AT 10:18 AM DST SERVED THE WITHIN
COMPLAINT ON LENNY HAWKINS, DEFENDANT AT RESIDENCE 513
GEORGE ST., HOUTZDALE, CLEARFIELD COUNTY, PENNSYLVANIA BY
HANDING TO CANDANCE HAWKINS, WIFE A TRUE AND ATTESTED COPY
OF THE ORIGINAL COMPLAINT AND MADE KNOWN TO HER THE CONTENTS
THEREOF.

SERVED BY: DAVIS/MORGILLO

27.36 SHFF. HAWKINS PAID BY: ATTY
10.00 SURCHARGE PAID BY: ATTY

SWORN TO BEFORE ME THIS

20th DAY OF July 2000
William A. Shaw

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2002
Clearfield Co., Clearfield, PA.

SO ANSWERS,

Chester A. Hawkins
by Marilyn Shaw

CHESTER A. HAWKINS
SHERIFF

FILED

JUL 20 2000

11:00:30 am

William A. Shaw
Prothonotary

ERIC M. BERMAN P.C.
BY: Paul M. Schofield, Jr.
Identification No.: 81894
198 Allendale Road, Suite 306
King of Prussia, PA 19406
(610) 265-7720

Attorneys for Plaintiff

114
GREENWOOD TRUST COMPANY BY
ITS AGENT DISCOVER FINANCIAL
SERVICES, INC.
C/O Eric Berman, P.C.
198 Allendale Road, Suite 306
King of Prussia, PA 19406

COURT OF COMMON PLEAS
CLEARFIELD COUNTY
TRIAL DIVISION
CIVIL ACTION

63
vs.
LENNY HAWKINS

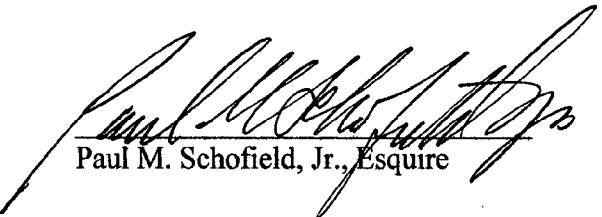
No. 00-716-CO

PRAECIPE TO SETTLE, DISCONTINUE AND END

TO THE PROTHONOTARY:

Please mark the above action settled, discontinued and ended without prejudice.

Dated: 9/18/2000


Paul M. Schofield, Jr., Esquire

FILED

SEP 20 2000

12:10 AM

William A. Shaw

Prothonotary

1 CEN to ATR

Copy to C/A

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

CIVIL DIVISION

GREENWOOD TRUST COMPANY BY ITS
DISCOVER FINANCIAL SERVICES, INC.

Plaintiff(s)

Vs.

No. 00-716-CD

LENN HAWKINS

Defendant(s)

CERTIFICATE OF DISCONTINUATION

Commonwealth of PA
County of Clearfield

I, William A. Shaw, Prothonotary of the Court of Common Pleas in and for the County and Commonwealth aforesaid do hereby certify that the above case was this day, the 20th of September A.D. 2000, marked:

SETTLED, DISCONTINUED AND ENDED WITHOUT PREJUDICE

Record costs in the sum of \$117.36 have been paid in full by Attorney for Plaintiff.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 18th day of September A.D. 2000.

Prothonotary

ATTORNEYS FOR PLAINTIFF
ERIC M. BERMAN, P.C.
By: Eric M. Berman, Esquire
Identification No. 83698
198 ALLENDALE ROAD
King of Prussia, PA 19406
(610) 265-7720

Our File No. 088385

-----X
GREENWOOD TRUST COMPANY, BY IT'S AGENT
DISCOVER FINANCIAL SERVICES, INC.

c/o ERIC M. BERMAN, P.C.
198 Allendale Road
King of Prussia, PA 19406

vs.

LENNY HAWKINS

COURT OF COMMON PLEAS
COUNTY OF CLEARFIELD

TRIAL DIVISION
CIVIL ACTION
No. 00-716-CO

-----X

PREACIPE TO WITHDRAW APPEARANCE

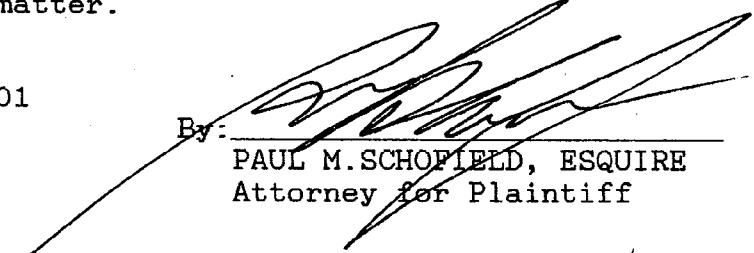
TO THE PROTHONOTARY:

Plaintiff is currently represented by Eric M. Berman, Esquire.

Kindly withdraw my appearance on behalf of the Plaintiff in
the above-captioned matter.

Dated: MARCH 28, 2001

By:


PAUL M. SCHOFIELD, ESQUIRE
Attorney for Plaintiff

PACHATT2-ZX

FILED

APR 02 2001

4/12/55/w

William A. Shaw
Prothonotary

No C/C

ATTORNEYS FOR PLAINTIFF
ERIC M. BERMAN, P.C.
By: Eric M. Berman, Esquire
Identification No. 83698
198 ALLENDALE ROAD
King of Prussia, PA 19406
(610) 265-7720

Our File No. 071418

-----X : COURT OF COMMON PLEAS
GREENWOOD TRUST COMPANY BY ITS SERVICER : COUNTY OF CLEARFIELD
DISCOVER FINANCIAL SERVICES, INC.
c/o ERIC M. BERMAN, P.C. : TRIAL DIVISION
198 Allendale Road : CIVIL ACTION
King of Prussia, PA 19406 : No.
vs. :
JANET STAUFFER
WILLIAM STAUFFER :
-----X

PREACIPE TO ENTER AND WITHDRAW APPEARANCE

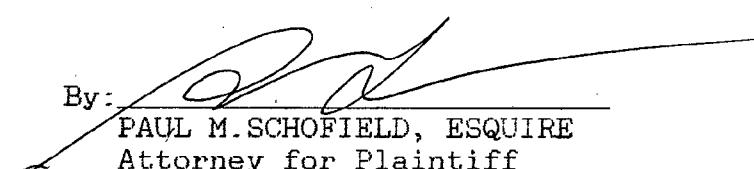
PREACIPE TO WITHDRAW APPEARANCE

TO THE PROTHONOTARY:

Kindly withdraw my appearance on behalf of the Plaintiff in
the above-captioned matter.

Dated: MARCH 27, 2001

By:


PAUL M. SCHOFIELD, ESQUIRE
Attorney for Plaintiff

ENTRY OF APPEARANCE

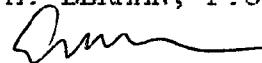
TO THE PROTHONOTARY:

Kindly enter my appearance on behalf of the Plaintiff in
the above-captioned matter.

Dated: MARCH 27, 2001

ERIC M. BERMAN, P.C.

By:


Eric M. Berman, Esquire
Attorney for Plaintiff

PACHNGAT-ZW

FILED

APR 02 2001

William A. Shaw
Prothonotary

