

01-811-CD
AMERICAN EXPRESS CENTURION BANK -vs- LAURA D. READ

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

AMERICAN EXPRESS CENTURION BANK,
Plaintiff,

CIVIL DIVISION

vs.

LAURA D. READ,
Defendant.

No.: 01-811-CD

COMPLAINT IN CIVIL ACTION

Code: 010 - Contract

Filed on Behalf of:
AMERICAN EXPRESS CENTURION BANK,
Plaintiff

Counsel of Record for this
Party:

GEORGE A. MILLER, ESQ.
BROMBERG & MILLER
PA I.D. # 22525
1106 FIFTH AVENUE
PITTSBURGH, PA 15219
(412) 232-0440

File 56343

FILED

MAY 29 2001

William A. Shaw
Prothonotary

**IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA**

CIVIL DIVISION

**AMERICAN EXPRESS CENTURION BANK,
Plaintiff,**

CIVIL DIVISION

vs.

**LAURA D. READ,
Defendant.**

No.:

COMPLAINT IN CIVIL ACTION

NOTICE TO DEFEND

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 WHERE YOU CAN GET LEGAL HELP.**

DAVID S. MEHOLICK, COURT ADMIN.
CLEARFIELD COUNTY COURTHOUSE
CLEARFIELD, PA 16830
Telephone: (814) 765-2641, Ext. 5982

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

AMERICAN EXPRESS CENTURION BANK,
Plaintiff, CIVIL DIVISION

vs.

LAURA D. READ,
Defendant. No.:

COMPLAINT IN CIVIL ACTION

Plaintiff, AMERICAN EXPRESS CENTURION BANK, brings this action against the DEFENDANT, LAURA D. READ, and states the following:

1. The Plaintiff, AMERICAN EXPRESS CENTURION BANK, is located at 200 Vesey Street, New York, NY.

2. The Defendant, LAURA D. READ, is an individual residing at 466 Treasure Lake, Du Bois, PA 15801.

3. The Plaintiff extended credit to the Defendant, and the Defendant became indebted to the Plaintiff upon Account No. 3721760571 in the amount of ONE THOUSAND THREE HUNDRED SIXTY SIX AND 09/100 DOLLARS (\$1366.09), a copy of the Invoices being attached hereto as Exhibit "A".

4. Defendant has failed to honor this obligation despite numerous efforts made by the Plaintiff. Plaintiff intends to

offer the attached exhibits into evidence at trial under Pa. R. Civ. Proc. Rule 1305, to the extent applicable.

5. The principal balance totals ONE THOUSAND THREE HUNDRED SIXTY SIX AND 09/100 DOLLARS (\$1366.09) and is still overdue and unpaid.

WHEREFORE, Plaintiff, AMERICAN EXPRESS CENTURION BANK, demands judgment of the Defendant, LAURA D. READ, in the sum of ONE THOUSAND THREE HUNDRED SIXTY SIX AND 09/100 DOLLARS (\$1366.09), plus interest, any applicable legal fees, and the costs of this suit.

Respectfully submitted,


George A. Miller, ESQ.
BROMBERG & MILLER
Attorney for Plaintiff
1106 Fifth Avenue
Pittsburgh, PA 15219
(412) 232-0440

VERIFICATION

The undersigned, Jason Harrison, does hereby verify that he/she is the Designated Agent of Plaintiff herein, that he/she is authorized to make this verification on behalf of the Plaintiff, and that the facts contained in the foregoing Complaint in Civil Action against Defendant LAURA D. READ, Account No. 3721760571, are true and correct to the best of her/his knowledge and belief.

This statement is made subject to the penalties of 18 Pa.C.S. Section 4904, relating to unsworn falsifications to authorities.

Jason Harrison
Designated Agent
TITLE
AMERICAN EXPRESS CENTURION
3721760571



W4

**Account
Statement**

MINIMUM PAYMENT DUE BY PAYMENT DUE DATE.

**Monthly
Activity
Summary**

	Minimum Payment Due	Past Due Amount	Payment Due Date	New Balance	Account Number	Please write in amount of payment enclosed
	20.00	.00	01/12/99	1,000.05	3737-217605-73006	\$

Make check payable to:

LAURA D READ
466 TREASURE LAKE
DUBOIS PA 15801-9010

AMERICAN EXPRESS CENTURION BANK
SUITE 0002
CHICAGO IL 60679-0002

|||||

3721760571 000020000001000054

Cardmember News Use your Card this holiday season! The Optima(R) Card is accepted everywhere the American Express(R) Card is welcome. Just look for the American Express logo at millions of restaurants, department stores, hotels and other fine establishments worldwide.

Cardmember Name	Account Number	Page
LAURA D READ	3737-217605-73006	1 of 1

Am. Exp. Reference No.	Date of Transaction	Date of Posting	Transaction Description	Charges	Credits
835339-0	12/05	12/05	PAYMENT RECEIVED - THANK YOU	12/05	40.00
			ACCOUNT TOTAL	.00	40.00
			YOUR CASH ADVANCE LIMIT IS \$500 AVAILABLE BALANCE FOR NEW CASH ADVANCE TRANSACTION IS \$0.		

Account Summary	Previous Balance	+ New Charges	- Payments	- Credits	+ FINANCE CHARGE	+ Debit Adjustments	= New Balance
	1,021.78	.00	40.00	.00	18.27	.00	1,000.05
Bill Closing Date	Payment Due Date	Credit Limit	Available Credit	Amount Over Credit Limit	Past Due Amount	Minimum Payment Due	
12/18/98	01/12/99	1,000	0	0	.00	20.00	

Finance Charge	Number of Days this Billing Period	x Daily Periodic Rate	x Average Daily Balance	= FINANCE CHARGE	CURRENT ANNUAL PERCENTAGE RATE	Thank You
PURCHASES	30	.0602%	732.67	13.23	21.990%	
CASH ADVANCES	30	.0602%	279.34	5.04	21.990%	

Account Statement

2 H2 0 1

W4



MINIMUM PAYMENT DUE BY PAYMENT DUE DATE.

Monthly Activity Summary

	Minimum Payment Due	Past Due Amount	Payment Due Date	New Balance	Account Number	Please write in amount of payment enclosed
	21.00	.00	03/14/99	1,071.56	3737-217605-73006	\$

Make check payable to:

LAURA D READ
466 TREASURE LAKE
DUBOIS PA 15801-9010AMERICAN EXPRESS CENTURION BANK
SUITE 0002
CHICAGO IL 60679-0002

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3721760571 000021000001071567

Cardmember News Use your Card to pay your federal income taxes. Just file electronically through an e-file service. Then call 888-2PAY-TAX(SM) to charge your IRS payment. For this convenience, a fee from US Audiotex(SM), the service provider, will be on your next statement. You will be informed of the fee at the time of the call. For more information, call 877-754-4413.

Cardmember Name	Account Number	Page
LAURA D READ	3737-217605-73006	1 of 1

Am. Exp. Reference No.	Date of Transaction	Date of Posting	Transaction Description	Charges	Credits
835031-O	01/31	01/31	PAYMENT RECEIVED - THANK YOU	01/31	41.00
431048-O	02/17	02/17	OVERLIMIT FEE ASSESSMENT		25.00
			ACCOUNT TOTAL	25.00	41.00
			YOUR CASH ADVANCE LIMIT IS \$500 AVAILABLE BALANCE FOR NEW CASH ADVANCE TRANSACTION IS \$0.		
			EFFECTIVE WITH BILLING PERIODS ENDING IN APRIL 1999, THE ANNUAL PERCENTAGE RATE APPLIED TO ACCOUNTS NOT IN GOOD STANDING WILL BE A FIXED RATE OF 23.99% WITH A DAILY PERIODIC RATE OF 0.0657%		

Account Summary	Previous Balance	+ New Charges	- Payments	- Credits	+ FINANCE CHARGE	+ Debit Adjustments	= New Balance
	1,068.72	25.00	41.00	.00	18.84	.00	1,071.56

Bill Closing Date	Payment Due Date	Credit Limit	Available Credit	Amount Over Credit Limit	Past Due Amount	Minimum Payment Due
02/17/99	03/14/99	1,000	0	72	.00	21.00

Finance Charge	Number of Days this Billing Period	x Daily Periodic Rate	x Average Daily Balance	= FINANCE CHARGE	CURRENT ANNUAL PERCENTAGE RATE	Thank You
PURCHASES CASH ADVANCES	30 30	.0596% .0596%	776.52 277.60	13.88 4.96	21.740% 21.740%	

Customer Service

The OptimaSM Card

Account Statement

2 H2 0 2

W4



YOUR ACCOUNT IS PAST DUE. PLEASE
REMIT PAYMENT IMMEDIATELY.

Monthly Activity Summary

	Minimum Payment Due	Past Due Amount	Payment Due Date	New Balance	Account Number	Please write in amount of payment enclosed
	43.00	21.00	04/13/99	1,140.92	3737-217605-73006	\$

Make check payable to:

LAURA D READ
466 TREASURE LAKE
DUBOIS PA 15801-9010

AMERICAN EXPRESS CENTURION BANK
SUITE 0002
CHICAGO IL 60679-0002

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0000373721760573006 000114092000004300 20H

Cardmember News Take advantage of American Express(R) Online Services! You can quickly and securely track recent charges and payments before your statement arrives, review past statements, and pay your bill online. Register for this FREE service online at www.americanexpress.com/cards

Cardmember Name				Account Number			Page	
LAURA D READ				3737-217605-73006			1 of 1	
Am. Exp. Reference No.	Date of Transaction	Date of Posting	Transaction Description				Charges	Credits
431078-0	03/19	03/19	DELINQUENCY FEE ASSESSMENT MIN PAYMENT NOT RECEIVED BY DUE DATE				25.00	
431078-0	03/19	03/19	OVERLIMIT FEE ASSESSMENT				25.00	
				ACCOUNT TOTAL			50.00	.00
			YOUR CASH ADVANCE LIMIT IS \$500 AVAILABLE BALANCE FOR NEW CASH ADVANCE TRANSACTION IS \$0.					
Account Summary	Previous Balance	+ New Charges	- Payments	- Credits	+ FINANCE CHARGE	+ Debit Adjustments	= New Balance	
	1,071.56	50.00	.00	.00	19.36	.00	1,140.92	
	Bill Closing Date	Payment Due Date	Credit Limit	Available Credit	Amount Over Credit Limit	Past Due Amount	Minimum Payment Due	
	03/19/99	04/13/99	1,000	0	141	21.00	43.00	
Finance Charge	Number of Days this Billing Period	x Daily Periodic Rate	x Average Daily Balance	= FINANCE CHARGE	CURRENT ANNUAL PERCENTAGE RATE	Thank You		
PURCHASES CASH ADVANCES	30 30	.0596% .0596%	804.07 278.47	14.38 4.98	21.740% 21.740%			

Customer Service

The OptimaSM Card

Account Statement



YOUR ACCOUNT IS SERIOUSLY PAST DUE. YOUR ACCOUNT HAS BEEN SUSPENDED. TO AVOID CANCELLATION, PLEASE REMIT PAYMENT NOW.

Monthly Activity Summary

	Minimum Payment Due	Past Due Amount	Payment Due Date	New Balance	Account Number	Please write in amount of payment enclosed
	67.00	43.00	05/13/99	1,213.65	3737-217605-73006	\$

LAURA D READ
466 TREASURE LAKE
DUBOIS PA 15801-9010

Make check payable to:

AMERICAN EXPRESS CENTURION BANK
SUITE 0002
CHICAGO IL 60679-0002

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0000373721760573006 000121365000006700 204H

Cardmember News The Optima(R) Card is accepted around the world -- and throughout your neighborhood! It's perfect for everyday purchases at the supermarket, the drugstore, the cleaners, and even your local gas station. And don't forget, no matter where you use the Card you'll always have the same superb customer service you've come to expect from American Express.

Cardmember Name	Account Number	Page
LAURA D READ	3737-217605-73006	1 of 1

Am. Exp. Reference No.	Date of Transaction	Date of Posting	Transaction Description	Charges	Credits
431108-0	04/18	04/18	DELINQUENCY FEE ASSESSMENT MIN PAYMENT NOT RECEIVED BY DUE DATE	25.00	
431108-0	04/18	04/18	OVERLIMIT FEE ASSESSMENT	25.00	
			ACCOUNT TOTAL	50.00	.00

Account Summary	Previous Balance	+ New Charges	- Payments	- Credits	+ FINANCE CHARGE	+ Debit Adjustments	= New Balance
	1,140.92	50.00	.00	.00	22.73	.00	1,213.65
Bill Closing Date	Payment Due Date	Credit Limit	Available Credit	Amount Over Credit Limit	Past Due Amount	Minimum Payment Due	
04/18/99	05/13/99	1,000	0	214	43.00	67.00	

Finance Charge	Number of Days this Billing Period	x Daily Periodic Rate	x Average Daily Balance	= FINANCE CHARGE	CURRENT ANNUAL PERCENTAGE RATE	Thank You
PURCHASES CASH ADVANCES	30 30	.0657% .0657%	869.78 283.74	17.14 5.59	23.990% 23.990%	

W4


Account Statement
**URGENT NOTICE - YOUR ACCOUNT IS CANCELLED.
REMIT PAYMENT IMMEDIATELY.**
Monthly Activity Summary

	Minimum Payment Due	Past Due Amount	Payment Due Date	New Balance	Account Number	Please write in amount of payment enclosed
	92.00	67.00	06/12/99	1,287.83	3737-217605-73006	\$

Make check payable to:

LAURA D READ
466 TREASURE LAKE
DUBOIS PA 15801-9010

AMERICAN EXPRESS CENTURION BANK
SUITE 0002
CHICAGO IL 60679-0002

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Cardmember News Shop online with confidence when you pay with your Optima(R) Card. Our Online Shopping Guarantee: When you use the American Express(R) Card, you will not be held responsible for unauthorized charges online. So go ahead, enjoy the convenience of online shopping today.

Cardmember Name	Account Number	Page
LAURA D READ	3737-217605-73006	1 of 1

Am. Exp. Reference No.	Date of Transaction	Date of Posting	Transaction Description	Charges	Credits
431138-0	05/18	05/18	DELINQUENCY FEE ASSESSMENT MIN PAYMENT NOT RECEIVED BY DUE DATE	25.00	
431138-0	05/18	05/18	OVERLIMIT FEE ASSESSMENT	25.00	
ACCOUNT TOTAL				50.00	.00

Account Summary	Previous Balance	+ New Charges	- Payments	- Credits	+ FINANCE CHARGE	+ Debit Adjustments	= New Balance
	1,213.65	50.00	.00	.00	24.18	.00	1,287.83
	Bill Closing Date	Payment Due Date	Credit Limit	Available Credit	Amount Over Credit Limit	Past Due Amount	Minimum Payment Due
	05/18/99	06/12/99	1,000	0	288	67.00	92.00

Finance Charge	Number of Days this Billing Period	x Daily Periodic Rate	x Average Daily Balance	= FINANCE CHARGE	CURRENT ANNUAL PERCENTAGE RATE	Thank You
PURCHASES CASH ADVANCES	30 30	.0657% .0657%	937.56 289.39	18.48 5.70	23.990% 23.990%	

Customer Service

The OptimaSM Card


**Account
Statement**

YOUR ACCOUNT IS CANCELLED AND HAS BEEN
REFERRED FOR COLLECTIONS.
PLEASE REMIT PAYMENT IMMEDIATELY.

**Monthly
Activity
Summary**

	Minimum Payment Due	Past Due Amount	Payment Due Date	New Balance	Account Number	Please write in amount of payment enclosed
	119.00	92.00	07/13/99	1,364.35	3737-217605-73006	\$

Make check payable to:

LAURA D READ
466 TREASURE LAKE
DUBOIS PA 15801-9010

AMERICAN EXPRESS CENTURION BANK
SUITE 0002
CHICAGO IL 60679-0002

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0000373721760573006 000136435000011900 19H

Cardmember News Don't forget to use your Optima(R) Card for all your everyday purchases. Your Card is now accepted at key new merchants which include Loews Cineplex Theaters (Loews, Sony, Cineplex Odeon, Magic Johnson Theatres), AT&T, Levitz Furniture and Drug Emporium.

Cardmember Name	Account Number	Page
LAURA D READ	3737-217605-73006	1 of 1

Am. Exp. Reference No.	Date of Transaction	Date of Posting	Transaction Description	Charges	Credits
431169-0	06/18	06/18	DELINQUENCY FEE ASSESSMENT MIN PAYMENT NOT RECEIVED BY DUE DATE	25.00	
431169-0	06/18	06/18	OVERLIMIT FEE ASSESSMENT	25.00	
ACCOUNT TOTAL				50.00	.00

Account Summary	Previous Balance	+ New Charges	- Payments	- Credits	+ FINANCE CHARGE	+ Debit Adjustments	= New Balance
	1,287.83	50.00	.00	.00	26.52	.00	1,364.35
	Bill Closing Date	Payment Due Date	Credit Limit	Available Credit	Amount Over Credit Limit	Past Due Amount	Minimum Payment Due
	06/18/99	07/13/99	1,000	0	0	92.00	119.00

Finance Charge	Number of Days this Billing Period	x Daily Periodic Rate	x Average Daily Balance	= FINANCE CHARGE	CURRENT ANNUAL PERCENTAGE RATE	Thank You
PURCHASES CASH ADVANCES	31 31	.0657% .0657%	1,006.98 295.24	20.51 6.01	23.990% 23.990%	

FILED

RECEIVED
MAY 29 2001
SHERIFF
William A. Shaw
Prothonotary
PA \$80.00

cc Shaw

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 11058

AMERICAN EXPRESS CENTURION BANK

01-811-CD

VS.

READ, LAURA D.

COMPLAINT

SHERIFF RETURNS

**NOW JUNE 6, 2001 AT 11:35 AM DST SERVED THE WITHIN COMPLAINT ON
LAURA D. READ, DEFENDANT AT RESIDENCE, 466 TREASURE LAKE, DUBOIS,
CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO LAURA READ A TRUE
AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN TO
HER THE CONTENTS THEREOF.**

SERVED BY: NEVLING/REITZ

Return Costs

Cost	Description
------	-------------

38.10	SHFF. HAWKINS PAID BY: ATTY.
-------	------------------------------

10.00	SURCHARGE PAID BY: ATTY.
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Sworn to Before Me This

13 Day Of June 2001

William A. Shaw

So Answers,

Chester Hawkins
by Marilyn Harris

Chester A. Hawkins

Sheriff

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

FILED

1:59
JUN 13 2001

William A. Shaw
Prothonotary

**IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA**

CIVIL DIVISION

**AMERICAN EXPRESS CENTURION BANK,
Plaintiff,**

CIVIL DIVISION

vs.

**LAURA D. READ,
Defendant.**

No.: 01-811-CD

**PRAECIPE TO SETTLE
AND DISCONTINUE**

Code: 010 - Contract

FILED

JUL 23 2001

William A. Shaw
Prothonotary

**Filed on Behalf of:
AMERICAN EXPRESS CENTURION BANK,
Plaintiff**

**Counsel of Record for this
Party:**

**GEORGE A. MILLER, ESQ.
PA I.D. #22525**

**BROMBERG & MILLER
Firm I.D. No. 937
1106 FIFTH AVENUE
PITTSBURGH, PA 15219
(412) 232-0440**

File 56343

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

AMERICAN EXPRESS CENTURION BANK,
Plaintiff, CIVIL DIVISION

vs.

LAURA D. READ,
Defendant. No.: 01-811-CD

PRAECIPE TO SETTLE AND DISCONTINUE

TO: PROTHONOTARY OF CLEARFIELD COUNTY

KINDLY discontinue the above action and mark the Docket
"SETTLED AND DISCONTINUED".


GEORGE A. MILLER, ESQ.
Attorney for Plaintiff
1106 FIFTH AVENUE
PITTSBURGH, PA 15219
(412) 232-0440

PROTHONOTARY

By: _____
Deputy

FILED
2:55
JUL 23 2001
William A. Shaw
Prothonotary

PA \$17.00
A/H
Miller

WAS

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

American Express Centurian Bank

Vs. No. 2001-00811-CD
Laura D. Read

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 on 7/23/01 marked:

Discontinue and Settle.

Record costs in the sum of \$80.00 have been paid in full by Mr. George A. Miller, Esq..

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 23rd day of July A.D. 2001.



William A. Shaw, Prothonotary