

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.: 01-811-00

**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".

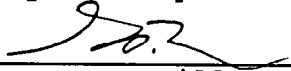
4. Defendant has failed to honor this obligation despite numerous efforts made by the Plaintiff. Plaintiff intends to

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

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
20.00	.00	01/12/99	1,000.05	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



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.

<b>Cardmember Name</b> LAURA D READ	<b>Account Number</b> 3737-217605-73006	<b>Page</b> 1 of 1
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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
			<b>ACCOUNT TOTAL</b>	.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%	

Customer  
ServiceThe Optima<sup>SM</sup> Card

Account  
Statement

MINIMUM PAYMENT DUE BY PAYMENT DUE DATE.

Monthly Activity Summary	Minumum 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 15801-9010

AMERICAN EXPRESS CENTURION BANK  
SUITE 0002  
CHICAGO IL 60679-0002



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
835031-0	01/31	01/31	PAYMENT RECEIVED - THANK YOU	01/31		41.00
431048-0	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	30	.0596%	776.52	13.88	21.740%	
CASH ADVANCES	30	.0596%	277.60	4.96	21.740%	



Account  
Statement

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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**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](http://www.americanexpress.com/cards)

Cardmember Name			Account Number	Page	
LAURA D READ			3737-217605-73006	1 of	1
Date of Transaction	Date of Posting	Transaction Description	Charges	Credits	
03/19	03/19	DELINQUENCY FEE ASSESSMENT MIN PAYMENT NOT RECEIVED BY DUE DATE	25.00		
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	30	.0596%	804.07	14.38	21.740%	
CASH ADVANCES	30	.0596%	278.47	4.98	21.740%	

Customer  
Service

The Optima<sup>SM</sup> Card

Account  
Statement

2 H2 0 3



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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**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	30	.0657%	869.78	17.14	23.990%	
CASH ADVANCES	30	.0657%	283.74	5.59	23.990%	

Customer  
Service

The Optima<sup>SM</sup> Card

Account  
Statement

211H2 0 4



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	30		.0657%	937.56	18.48	23.990%	
CASH ADVANCES	30		.0657%	289.39	5.70	23.990%	

Customer  
Service

The Optima<sup>SM</sup> Card

Account  
Statement

211H2150 5



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



0000373721760573006 000136435000011900 19HH

**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	31	.0657%	1,006.98	20.51	23.990%	
CASH ADVANCES	31	.0657%	295.24	6.01	23.990%	

Customer  
Service

The Optima<sup>SM</sup> Card

FILED

MAY 29 2001

~~Wm~~ 13401 att, melen  
William A. Shaw  
Prothonotary

PD \$ 80.00

1cc 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

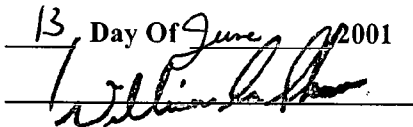
**SHERIFF RETURNS**

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.

Sworn to Before Me This

13 Day Of June, 2001  


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

So Answers,

  
Chester A. Hawkins  
Sheriff

**FILED**  
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.**

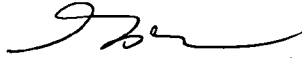
**LAURA D. READ,  
Defendant.**

**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

pd 917.00  
Atty  
Miller



William A. Shaw  
Prothonotary

**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**

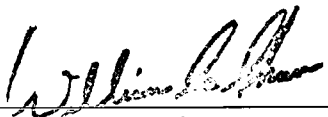
Commonwealth of PA  
County of Clearfield

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