

02-354-CD
DISCOVER BANK -vs- RHONDA J. BLAIR

Our File No. 151430
ATTORNEYS FOR PLAINTIFF
ERIC M. BERMAN, P.C.
BY: Eric M. Berman, Esquire, I.D. 83698
BY: Ron Z. Opher, Esquire, I.D. 57507
198 Allendale Road, Suite 306
King of Prussia, PA 19406
(610) 265-7720

FILED

MAR 11 2002

-----X
DISCOVER BANK :
c/o ERIC M. BERMAN, P.C. :
198 Allendale Road, Suite 306 :
King of Prussia, PA 19406 :
vs. :
RHONDA J BLAIR :
-----X

COURT OF COMMON PLEAS
COUNTY OF CLEARFIELD
Prothonotary
WILLIAM A. STEWART
TRIAL DIVISION
CIVIL ACTION
Term 02-354-05
No. 2001-3174

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 la corte puede decidir a favor del demandante y requiere que usted compla 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 INMEDIATEMENTE. SI NO TIENE ABOGA O SO NO TIENE EL DINERO SUFICIENTE 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.: 800-692-737

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BY: Ron Z. Opher, Esquire, I.D. 57505
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KING OF PRUSSIA, PA 19406
(610) 265-7720

DISCOVER BANK
c/o ERIC M. BERMAN, P.C.
198 Allendale Road, Suite 306
King of Prussia, PA 19406

vs.

RHONDA J BLAIR

-----X
: COURT OF COMMON PLEAS
: COUNTY OF CLEARFIELD
:
: CIVIL ACTION
: _____ Term _____
:
: No. 2001-3174
:
:
:
:
:-----X

COMPLAINT

1. Plaintiff, DISCOVER BANK ,
is a DELAWARE BUSINESS TRUST
licensed to do business in the Commonwealth of Pennsylvania with its
place of business at P.O. BOX 8003, HILLIARD, OH 43026.

2. The Defendant(s), RHONDA J BLAIR ,
resides at 963 FRENCHVILLE RD , FRENCHVILLE, PA 16836-2707.

3. There is due from the Defendant(s) the sum of \$4,506.43 for
credit extended by Plaintiff to Defendant(s), acct. no. 6011002110211372,
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 \$4,506.43 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.

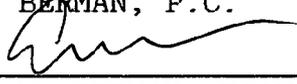
5. All applicable credits, if any, have been duly applied to
Defendant(s) credit account.

WHEREFORE, Plaintiff claims of the Defendant(s) the sum of \$4,506.43
plus interest, attorneys fees and costs which are justly due and
owing from the Defendant(s) to the Plaintiff.

Dated: JANUARY 16, 2002

SPACE-AQ

ERIC M. BERMAN, P.C.

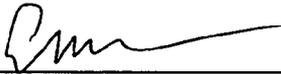
BY: 
ERIC M. BERMAN, ESQUIRE

BY: 
RON Z. Opher, Esquire
Attorneys for Plaintiff

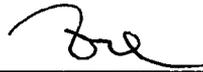
VERIFICATION

RON Z. OPHER, ESQUIRE, being duly sworn according to law, deposes and says that he is of Counsel to 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



RON Z. OPHER, ESQUIRE

Dated: JANUARY 16, 2002

SPACE-AQ



payment due date
May 28, 2001
minimum payment due
\$742.00

new balance
\$0.00

account number 6011 0021 1021 1372
enter amount enclosed below

\$



T000064
RHONDA BLAIR
903 HALFMOON ST
BELLEFONTE PA 16823-2707

151430

Great Balance Transfer rates!
Call 1-800-DISCOVER to see if an
offer is available for you.

PO BOX 6011
DOVER DE 19903-6011



Address or telephone change? Please print change in the space above.

0000060110021102113720000000000000000074200



Closing Date: April 30, 2001

page 1 of 1

| Cashback Bonus [®] Award | this period | to date |
|--|-------------|---------|
| Qualified Purchases | \$0.00 | \$0.00 |
| Cashback Bonus award earned | \$0.00 | \$0.00 |
| Cashback Bonus anniversary date: August 20 | | |

Discover Card Account Summary

account number 6011 0021 1021 1372
payment due date May 28, 2001
minimum payment due \$742.00
credit limit \$3,000.00
credit available \$0.00
cash credit limit \$1,500.00
cash credit available \$0.00

| | |
|----------------------|------------|
| previous balance | \$4,506.43 |
| payments and credits | - 4,506.43 |
| purchases | + 0.00 |
| cash advances | + 0.00 |
| balance transfers | + 0.00 |
| FINANCE CHARGES | + 0.00 |
| new balance | = \$0.00 |

Transactions

| | trans. date | post date | | |
|----------------------|-------------|-----------|---------------------|--------------|
| Payments and Credits | Apr 30 | Apr 30 | INTERNAL CHARGE-OFF | \$ -4,506.43 |

T000064 AZXS

| | Average Daily Balances | Daily Periodic Rate | ANNUAL PERCENTAGE RATES | Periodic FINANCE CHARGES | Transaction Fee FINANCE CHARGES | Rate Plan |
|---------------------------------|------------------------|---------------------|-------------------------|--------------------------|---------------------------------|-----------|
| current billing period: 10 days | | | | | | |
| Purchases | \$0 | 0.06025% | 21.99% | \$0 | none | fixed |
| Cash Advances | \$0 | 0.06025% | 21.99% | \$0 | \$0 | fixed |

Questions? Call 1-800-DISCOVER (1-800-347-2683) or log on to Discovercard.com. For TDD (Telecommunication Device for the Deaf) assistance, see reverse side. Send billing error notice to: Discover Card; P.O. Box 15192; Wilmington, DE 19850-5192.



11 June 02 Document
Reinstated/~~Reinstated~~ to ~~Attorney~~ Attorney
for service.


Deputy Prothonotary

FILED

Atty pd. 80.00
MAR 11 2002
2 cc Sheriff

MJ 8:56 AM



William A. Shaw
Prothonotary

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 12230

DISCOVER BANK

02-354-CD

VS.

BLAIR, RHONDA J.

COMPLAINT

SHERIFF RETURNS

NOW APRIL 26, 2002 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURN THE WITHIN COMPLAINT "NOT FOUND" AS TO RHONDA J. BLAIR, DEFENDANT. SEVERAL ATTEMPTS MADE, DEFENDANT IS ONLY IN CLEARFIELD COUNTY ON THE WEEKENDS, CAN BE SERVED DURING THE WEEK AT: c/o JOSEPH ROTH, REAR 1212 2nd AVE., SECOND FL., ALTOONA, PA.

Return Costs

Cost Description
56.15 SHFF. HAWKINS PAID BY: ATTY.
10.00 SURCHARGE PAID BY: ATTY.

Sworn to Before Me This

30th Day Of April 2002
[Signature]

So Answers,

[Signature]
Chester A. Hawkins
Sheriff

FILED

012:58 PM
APR 30 2002

[Signature]
William A. Shaw
Prothonotary

Our File No. 151430
 ATTORNEYS FOR PLAINTIFF
 ERIC M. BERMAN, P.C.
 BY: Eric M. Berman, Esquire, I.D. 83698
 BY: Ron Z. Opher, Esquire, I.D. 57507
 198 Allendale Road, Suite 306
 King of Prussia, PA 19406
 (610) 265-7720

I hereby certify this to be a true
 and attested copy of the original
 statement filed in this case

MAR 11 2002

Attest: *William J. ...*
 Prothonotary

COURT OF COMMON PLEAS
 COUNTY OF CLEARFIELD

-----X
 :
 DISCOVER BANK :
 c/o ERIC M. BERMAN, P.C. :
 198 Allendale Road, Suite 306 :
 King of Prussia, PA 19406 :
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 vs. :
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 RHONDA J BLAIR :
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TRIAL DIVISION
 CIVIL ACTION 02-354-CD
 _____ Term _____
 No. 2001-3174

NOTICE

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198 Allendale Road, Suite 306
King of Prussia, PA 19406

vs.

RHONDA J BLAIR
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COURT OF COMMON PLEAS
COUNTY OF CLEARFIELD

CIVIL ACTION

Term _____

No. 2001-3174

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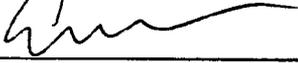
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WHEREFORE, Plaintiff claims of the Defendant(s) the sum of \$4,506.43
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Dated: JANUARY 16, 2002

SPACE-AQ

ERIC M. BERMAN, P.C.

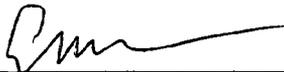
BY: 
ERIC M. BERMAN, ESQUIRE

BY: 
RON Z. Opher, Esquire
Attorneys for Plaintiff

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ERIC M. BERMAN, ESQUIRE



RON Z. OPPER, ESQUIRE

Dated: JANUARY 16, 2002

SPACE-AQ

DISCOVER

payment due date
May 28, 2001
minimum payment due
\$742.00

new balance
\$0.00

account number 6011 0021 1021 1372
enter amount enclosed below

\$



T000064
RHONDA BLAIR
903 HALFMOON ST
BELLEFONTE PA 16823-2707

151430

Great Balance Transfer rates!
Call 1-800-DISCOVER to see if an offer is available for you.

PO BOX 6011
DOVER DE 19903-6011



Address or telephone change? Please print change in the space above.

00000601100211021137200000000000000000074200



Closing Date: April 30, 2001 page 1 of 1

| Cashback Bonus [®] Award | this period | to date |
|--|-------------|---------|
| Qualified Purchases | \$0.00 | \$0.00 |
| Cashback Bonus award earned | \$0.00 | \$0.00 |
| Cashback Bonus anniversary date: August 20 | | |

Discover Card Account Summary

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 cash credit limit \$1,500.00
 cash credit available \$0.00

| | |
|----------------------|------------|
| previous balance | \$4,506.43 |
| payments and credits | - 4,506.43 |
| purchases | + 0.00 |
| cash advances | + 0.00 |
| balance transfers | + 0.00 |
| FINANCE CHARGES | + 0.00 |
| new balance | = \$0.00 |

Transactions

| | trans. date | post date | | |
|----------------------|-------------|-----------|---------------------|--------------|
| Payments and Credits | Apr 30 | Apr 30 | INTERNAL CHARGE-OFF | \$ -4,506.43 |

T000064 A7 ZXS

| | Average Daily Balances | Daily Periodic Rates | ANNUAL PERCENTAGE RATES | Periodic FINANCE CHARGES | Transaction Fee FINANCE CHARGES | Rate Plan |
|---------------------------------|------------------------|----------------------|-------------------------|--------------------------|---------------------------------|-----------|
| current billing period: 10 days | | | | | | |
| Purchases | \$0 | 0.06025% | 21.99% | \$0 | none | fixed |
| Cash Advances | \$0 | 0.06025% | 21.99% | \$0 | \$0 | fixed |

Questions? Call 1-800-DISCOVER (1-800-347-2683) or log on to Discovercard.com. For TDD (Telecommunication Device for the Deaf) assistance, see reverse side. Send billing error notice to: Discover Card; P.O. Box 15192; Wilmington, DE 19850-5192.



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 ATTORNEYS FOR PLAINTIFF
 ERIC M. BERMAN, P.C.
 BY: Eric M. Berman, Esquire, I.D. 83698
 BY: Ron Z. Opher, Esquire, I.D. 57507
 198 Allendale Road, Suite 306
 King of Prussia, PA 19406
 (610) 265-7720

I hereby certify this to be a true
 and attested copy of the original
 statement filed in this case

COPY

MAR 11 2002

Attest: *William H. ...*
 Prothonotary

COURT OF COMMON PLEAS
 COUNTY OF CLEARFIELD

-----X
 :
 DISCOVER BANK :
 c/o ERIC M. BERMAN, P.C. :
 198 Allendale Road, Suite 306 :
 King of Prussia, PA 19406 :
 :
 vs. :
 :
 RHONDA J BLAIR :
 -----X

TRIAL DIVISION
 CIVIL ACTION
 _____ Term _____ 02-354-0
 No. 2001-3174

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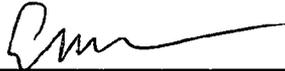
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LAWYER REFERRAL SERVICE, COUNTY OF CLEARFIELD BAR ASSOCIATION
 Address: CLEARFIELD COUNTY COURTHOUSE, CLEARFIELD, PA 16830 Tel.: 800-692-7

VERIFICATION

RON Z. OPPER, ESQUIRE, being duly sworn according to law, deposes and says that he is of Counsel to 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.

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ERIC M. BERMAN, ESQUIRE



RON Z. OPPER, ESQUIRE

Dated: JANUARY 16, 2002

SPACE-AQ

DISCOVER

payment due date
May 28, 2001
minimum payment due
\$742.00

new balance
\$0.00

account number 6011 0021 1021 1372
enter amount enclosed below

\$



T000064
RHONDA BLAIR
903 HALFMON ST
BELLEFONTE PA 16823-2707

151430

Great Balance Transfer rates!
Call 1-800-DISCOVER to see if an
offer is available for you.

PO BOX 6011
DOVER DE 19903-6011



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Closing Date: April 30, 2001

page 1 of 1

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| | |
|----------------------|------------|
| previous balance | \$4,506.43 |
| payments and credits | - 4,506.43 |
| purchases | + 0.00 |
| cash advances | + 0.00 |
| balance transfers | + 0.00 |
| FINANCE CHARGES | + 0.00 |
| new balance | = \$0.00 |

Transactions

| | trans. date | post date | | |
|----------------------|-------------|-----------|---------------------|--------------|
| Payments and Credits | Apr 30 | Apr 30 | INTERNAL CHARGE-OFF | \$ -4,506.43 |

T000064 A7 ZX5

| | Average Daily Balances | Daily Periodic Rates | ANNUAL PERCENTAGE RATES | Periodic FINANCE CHARGES | Transaction Fee FINANCE CHARGES | Rate Plan |
|---------------------------------|------------------------|----------------------|-------------------------|--------------------------|---------------------------------|-----------|
| current billing period: 10 days | | | | | | |
| Purchases | \$0 | 0.06025% | 21.99% | \$0 | none | fixed |
| Cash Advances | \$0 | 0.06025% | 21.99% | \$0 | \$0 | fixed |

Questions? Call 1-800-DISCOVER (1-800-947-2689) or log on to Discovercard.com. For TDD (Telecommunication Device for the Deaf) assistance, see reverse side. Send billing error notice to: Discover Card; P.O. Box 15192; Wilmington, DE 19850-5192.



ERIC BERMAN, P.C.
BY: Ron Z. Opher, Esq.
Attorney for Plaintiff
Attorney#57507
198 Allendale Road, Suite 306
King Of Prussia, PA 19406
(610) 265-7720

DISCOVER BANK
C/O ERIC M. BERMAN P.C
198 Allendale Rd. Suite 306
King of Prussia, PA 19406

Plaintiff

v.

RHONDA J BLAIR
963 Frenchville Rd.,
Frenchville, PA 16836-2707

Defendant

COURT OF COMMON PLEAS
CLEARFIELD COUNTY, PA

CIVIL ACTION - LAW

NO. 02-354-CD

ORDER

This matter having been brought before the Court on motion of Ron Z. Opher, attorney for Plaintiff, for an Order Allowing Alternative Service of the Complaint by ordinary and certified mail, return receipt requested, and the Court having considered the matter and good cause appearing,

AND NOW, to wit, this 14th day of May, 2002, Plaintiff's Motion for Alternative Service is GRANTED. Plaintiff may serve the Complaint upon Defendant by ordinary and certified mail, return receipt requested. The Complaint shall be deemed as served if the requirements of Pa.R.Civ.P. 403, relating to service by mail, are met.

BY THE COURT:

 _____ J.

FILED

MAY 14 2002
013.451 ICC. atty Opher
William A. Shaw
Prothonotary


ERIC BERMAN, P.C.
BY: Ron Z. Opher, Esq.
Attorney for Plaintiff
Attorney#57507
198 Allendale Road, Suite 306
King Of Prussia, PA 19406
(610) 265-7720

DISCOVER BANK
C/O ERIC M. BERMAN P.C
198 Allendale Rd. Suite 306
King of Prussia, PA 19406

Plaintiff

v.

RHONDA J BLAIR
963 Frenchville Rd.,
Frenchville, PA 16836-2707

Defendant

: COURT OF COMMON PLEAS
: CLEARFIELD COUNTY, PA
:
:
:

: CIVIL ACTION - LAW

: NO. 02-354-CD

FILED

MAY 13 2002

William A. Shaw
Prothonotary

PLAINTIFF'S MOTION FOR ALTERNATIVE SERVICE

1. Plaintiff, by and through its undersigned counsel, filed a complaint against Defendant on or about December 28, 2001.
2. Plaintiff sought service of said complaint upon Defendant on or about January 14, 2002. Service of Process by the Sheriff was not obtained.. A true and correct copy of Sheriff's Order For Service is attached hereto and marked Exhibit "A."
3. Plaintiff inquired of the postal authorities pursuant to the Freedom of Information Act, 39 C.F.R. Part 265, to learn that the address of Defendant whereupon the Process Server sought to serve the complaint is the Defendant's correct address. A true and correct copy of the Freedom of Information request is attached hereto and marked Exhibit "B."
4. Plaintiff consulted various on-line address and telephone directories, to no avail.
5. Plaintiff requests that the Court allow Alternative Service by ordinary and certified mail, return receipt requested; to wit, Pa.R.Civ.P. 430 provides that the Plaintiff may move the Court for a special order directing the method of service if service cannot be made and a good faith effort to serve the complaint by regular service has been made.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court grant its Motion for Alternative Service of the Complaint by ordinary and certified mail, return receipt requested, upon Defendant. The Complaint shall be deemed as served if the requirements of Pa.R.Civ.P. 403 relating to service by mail, are met.

DATED: May 9, 2002

BY: 

Ron Z. Opher, Esquire
Attorney for Plaintiff

In The Court of Common Pleas of Clearfield County, Pennsylvania

151430

Sheriff Docket # 12230

DISCOVER BANK

02-354-CD

VS.

BLAIR, RHONDA J.

COPY

COMPLAINT

SHERIFF RETURNS

NOW APRIL 26, 2002 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURN THE WITHIN COMPLAINT "NOT FOUND" AS TO RHONDA J. BLAIR, DEFENDANT. SEVERAL ATTEMPTS MADE, DEFENDANT IS ONLY IN CLEARFIELD COUNTY ON THE WEEKENDS, CAN BE SERVED DURING THE WEEK AT: c/o JOSEPH ROTH, REAR 1212 2nd AVE., SECOND FL., ALTOONA, PA.

Return Costs

| Cost | Description |
|-------|------------------------------|
| 56.15 | SHFF. HAWKINS PAID BY: ATTY. |
| 10.00 | SURCHARGE PAID BY: ATTY. |

Sworn to Before Me This

_____ Day Of _____ 2002

So Answers,



Chester A. Hawkins
Sheriff

A

ERIC M. BERMAN, P.C.

May 1, 2002

Postmaster
Frenchville, PA 16836-2707

Re: Rhonda J. Blair
last known address:
963 Frenchville Rd.
Frenchville, PA 16836-2707

*Correct
address*



The above-named individual is the subject of a legal proceeding. In order to obtain valid service of process, a physical (street) address is necessary.

Would you please, at your earliest convenience, either confirm that the above named individual continues to receive mail at the above street address, or, if the individual is no longer located at the above street address, please indicate any forwarding address.

Sincerely,

A handwritten signature in black ink, appearing to be "R. Opher".

Ron Z. Opher, Esquire

RZO:kts
enclosure

985 Old Eagle School Rd., #505 • Wayne, PA 19087 • 610-902-0530

B

| | | |
|-----------------------------|---|-----------------------|
| DISCOVER BANK | : | COURT OF COMMON PLEAS |
| C/O ERIC M. BERMAN P.C | : | CLEARFIELD COUNTY, PA |
| 198 Allendale Rd. Suite 306 | : | |
| King of Prussia, PA 19406 | : | |
| | : | |
| Plaintiff | : | |
| | : | |
| v. | : | CIVIL ACTION - LAW |
| | : | |
| RHONDA J BLAIR | : | |
| 963 Frenchville Rd., | : | NO. 02-354-CD |
| Frenchville, PA 16836-2707 | : | |
| | : | |
| Defendant | : | |

PROOF OF ATTEMPTS TO SERVE DEFENDANT BY REGULAR SERVICE

1. I, Ron Z. Opher, Esquire certify that on December 28, 2001, I filed a Civil Complaint against Defendant Rhonda J Blair. I sent a copy of the Complaint to the Sheriff to make Service of Process upon 963 Frenchville Rd, Frenchvile PA 16836-2707. The Sheriff was unable to make service upon Defendant. A true and correct copy of Sheriff's Order For Service is attached hereto and marked Exhibit "A."

2. I then sent a request to the postal authorities in Frenchville, PA, to verify that the Defendant's address was correct. The Postmaster verified that Defendant continues to reside/receive mail at 963 Frenchville Rd, Frenchvile PA 16836-2707. A copy of the Postmaster's response is attached.

3. I consulted various on-line address and telephone directories to verify Defendant's address, to no avail.

AFFIDAVIT

| | |
|------------------------------|------|
| COMMONWEALTH OF PENNSYLVANIA | : |
| | :ss. |
| COUNTY OF CLEARFIELD | : |

I, Ron Z. Opher, Esquire hereby certify that the statements made in the foregoing Proof of Attempts to Serve Defendant by Regular Service are true and correct to the best of my

knowledge, information and belief and that said statements are made subject to the penalties of 18 Pa. C.S.A. §4904 relating to unsworn falsification to authorities.

DATED: May 9, 2002



Ron Z. Opher, Esquire
Attorney for Plaintiff- Movant

DISCOVER BANK
C/O ERIC M. BERMAN P.C
198 Allendale Rd. Suite 306
King of Prussia, PA 19406

Plaintiff

v.

RHONDA J BLAIR
963 Frenchville Rd.,
Frenchville, PA 16836-2707

Defendant

: COURT OF COMMON PLEAS
: CLEARFIELD COUNTY, PA

: CIVIL ACTION - LAW

: NO. 02-354-CD

CERTIFICATION OF MAILING

COMMONWEALTH OF PENNSYLVANIA :
:SS
COUNTY OF CLEARFIELD :

I, Ron Z. Opher, Esquire, being duly sworn according to law, hereby certify that on May 9, 2002 a true and correct copy of Plaintiff's Motion for Alternative Service was served by mailing same by United States first-class mail, postage prepaid, to Defendant, at 963 Frenchville Rd, Frenchville PA 16836-2707

DATED: May 9, 2002

BY: 

Ron Z. Opher, Esquire

FILED

MAY 13 2002

m/a l2/noc

William A. Shaw
Prothonotary



ERIC BERMAN, P.C.
BY: Ron Z. Opher, Esq.
Attorney for Plaintiff
Attorney#57507
985 Old Eagle School Rd #505
Wayne PA , 19087

DISCOVER BANK
c/o Eric M. Berman, P.C.
198 Allendale Road, Suite 402
King Of Prussia, PA 19406
Plaintiff
v.
RHONDA J BLAIR
Defendant

IN THE COURT OF COMMON PLEAS
CLEARFIELD COUNTY, PA

CIVIL ACTION - LAW

NO. 02-354-CD

PRAECIPE TO REINSTATE COMPLAINT - CIVIL ACTION

TO THE PROTHONOTARY:

Kindly reinstate the Complaint in the above-captioned matter for an additional 30 days, as service has not yet been made upon the Defendant.

DATED : May 23, 2002

BY: 

Ron Z. Opher, Esquire
Attorney for Plaintiff

FILED

JUN 11 2002

William A. Shaw
Prothonotary

FILED

JUN 11 2002

12:32 / atty O phen pd # 2.00

William A. Shaw
Prothonotary

1 Comp. Sec. to atty.

6-11-02 Document
Reinstated/Reinstated to Sheriff/Attorney
for service.
William A. Shaw
Deputy Prothonotary

[Handwritten initials]

ERIC M. BERMAN, P.C.
 BY: Ron Z. Opher, Esquire
 Attorney for Plaintiff
 Attorney#57507
 985 Old Eagle School Rd., Suite 505
 Wayne, PA 19087
 (610) 902-0530

| | | |
|------------------------|---|-----------------------|
| Discover Bank | : | COURT OF COMMON PLEAS |
| | : | COUNTY OF Clearfield |
| | : | CIVIL ACTION |
| Plaintiff | : | |
| v. | : | |
| | : | |
| Rhonda J. Blair | : | NO. 02-354-CD |
| | : | |
| Defendant | : | |

PROOF OF SERVICE

1. Plaintiff filed a Complaint-Civil Action in the above matter on December 28, 2001.
2. Plaintiff, upon Motion to the Court, obtained an Order for Alternative (Mail) Service upon Defendant on May 14, 2002.
3. Plaintiff filed a Praecipe to Reinstate said Complaint on June 11, 2002.
4. Plaintiff's attorney sent a copy of this Complaint to Defendant on June 14, 2002 via USPS certified mail RRR and by regular mail, pursuant to the Court Order and Pa.R.C.P. 404(2), 403(1).
5. The complaint was served on June 29, 2002 upon Defendant by mail. A copy of the certified mail return receipt, along with the Certificate of Mailing for regular mail, dated June 14, 2002 are attached hereto and marked collectively as Exhibit "A."

6 Plaintiff files this Proof of Service pursuant to Pa.R.C.P. 405 and 430.

FILED

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA :
 :ss.
 COUNTY OF Clearfield :

NOV 13 2002
 11:48 AM
 William A. Shaw
 Prothonotary

1cc
to
Opher

I, Ron Z. Opher, Esquire hereby certify that the statements made in the foregoing Proof of Service are true and correct to the best of my knowledge, information and belief and that said statements are made subject to the penalties of 18 Pa. C.S.A. §4904 relating to unsworn falsification to authorities.

DATED: November 6, 2002



 Ron Z. Opher, Esquire

ERIC M. BERMAN, P.C.
BY: Ron Z. Opher, Esquire
Attorney for Plaintiff
Attorney#57507
985 Old Eagle School Rd., Suite 505
Wayne, PA 19087
(610) 902-0530

| | | |
|------------------------|---|-----------------------|
| Discover Bank | : | COURT OF COMMON PLEAS |
| | : | COUNTY OF Clearfield |
| | : | CIVIL ACTION |
| | : | |
| Plaintiff | : | |
| v. | : | |
| | : | |
| Rhonda J. Blair | : | NO. 02-354-CD |
| | : | |
| Defendant | : | |

AFFIDAVIT OF NON-MILITARY SERVICE

COMMONWEALTH OF PENNSYLVANIA :
:SS.
COUNTY OF Clearfield :

I, Ron Z. Opher, Esquire, being duly sworn according to law, depose and say that I am an agent of the Plaintiff; that I am authorized to take this affidavit on behalf of Plaintiff; that Defendant **Rhonda J. Blair** is located at 963 Frenchville Rd., Frenchville, PA 16836; and that Defendant **Rhonda J. Blair** is not in the Military Service of the United States, nor any State or Territory Thereof or its allies as defined in the Soldiers' and Sailors' Civil Relief Act of 1940 and the amendments thereto.

Affiant also certifies that the address of Plaintiff is c/o Eric M. Berman, P.C., 985 Old Eagle School Rd., Suite 505, Wayne, PA 19087.

DATED: November 8 2002



Ron Z. Opher, Esquire

ERIC M. BERMAN, P.C.
BY: Ron Z. Opher, Esquire
Attorney for Plaintiff
Attorney#57507
985 Old Eagle School Rd., Suite 505
Wayne, PA 19087
(610) 902-0530

| | | |
|------------------------|---|------------------------------|
| Discover Bank | : | IN THE COURT OF COMMON PLEAS |
| | : | Clearfield COUNTY, PA |
| | : | |
| Plaintiff | : | |
| | : | |
| v. | : | CIVIL ACTION - LAW |
| | : | |
| Rhonda J. Blair | : | NO. 02-354-CD |
| 963 Frenchville Rd. | : | |
| Frenchville, PA 16836 | : | |
| | : | |
| Defendant | : | |

PRAECIPE FOR JUDGMENT

Enter Judgment in favor of Plaintiff, **Discover Bank**, against Defendant, **Rhonda J. Blair**, for want of an answer

Assess damages as follows:

| | |
|-------|------------------------|
| Debt | \$4506.43 |
| TOTAL | \$4506.43 (plus costs) |

I CERTIFY THAT THE FOREGOING ASSESSMENT OF DAMAGES IS FOR SPECIFIED AMOUNTS ALLEGED TO BE DUE IN THE COMPLAINT AND IS CALCULABLE AS A SUM CERTAIN FROM THE COMPLAINT.

I certify that written notice of the intention to file this praecipe was mailed or delivered to the party against whom judgment is to be entered after the default occurred and at least ten days prior to the date of the filing of this praecipe. Copies are attached. R.C.P. 237.1



Ron Z. Opher, Esquire ID #57507
Attorney for Plaintiff

AND NOW _____, 20____, Judgment is entered in favor of **Discover Bank**, against Defendant, **Rhonda J. Blair**, by Default for want of an answer, and damages assessed at the sum of \$4506.43 plus costs as per the above certification.

FILED
M 1:48 BA Pd 200
NOV 13 2002

Prothonotary

William A. Shaw
Prothonotary

OFFICE OF THE PROTHONOTARY
COURT OF COMMON PLEAS
Clearfield COUNTY COURTHOUSE
230 E. Market St.
Clearfield, PA 16830

TO: **Rhonda J. Blair**
963 Frenchville Rd.
Frenchville, PA 16836

| | | |
|------------------------|---|------------------------------|
| Discover Bank | : | IN THE COURT OF COMMON PLEAS |
| | : | Clearfield COUNTY, PA |
| | : | |
| | : | |
| Plaintiff | : | |
| | : | |
| v. | : | CIVIL ACTION - LAW |
| | : | |
| | : | |
| Rhonda J. Blair | : | NO. 02-354-CD |
| 963 Frenchville Rd. | : | |
| Frenchville, PA 16836 | : | |
| | : | |
| 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.

Prothonotary

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE, PLEASE CALL
RON Z. OPPER, ESQUIRE, at 610-902-0530.

ERIC M. BERMAN, P.C.
Ron Z. Opher, Esquire
Attorney for Plaintiff
Attorney#57507
985 Old Eagle School Rd. Ste. 505
Wayne, PA 19087
(610) 902-0530

| | | |
|-----------------------------------|---|------------------------------|
| Discover Bank | : | IN THE COURT OF COMMON PLEAS |
| C/O Eric M. Berman,PC | : | |
| 985 Old Eagle School Rd., Ste 505 | : | CLEARFIELD COUNTY, PA |
| Wayne, PA 19087 | : | |
| | : | |
| Plaintiff | : | |
| | : | |
| v. | : | CIVIL ACTION - LAW |
| | : | |
| Rhonda J. Blair | : | |
| 963 Frenchville Rd. | : | NO. 02-354-CD |
| Frenchville, PA 16836 | : | |
| | : | |
| Defendant | : | |

TO: **Rhonda J. Blair**
963 Frenchville Rd.
Frenchville, PA 16836

DATED: October 18, 2002

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO TAKE ACTION REQUIRED OF YOU IN THIS CASE. 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 NOTICE TO A LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE FOLLOWING OFFICE TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

LAWYER REFERRAL SERVICE
Clearfield County Bar Association
215 E. Locust St.
Clearfield, PA 16830
(814) 765-1581

U.S. POSTAL SERVICE CERTIFICATE OF MAILING

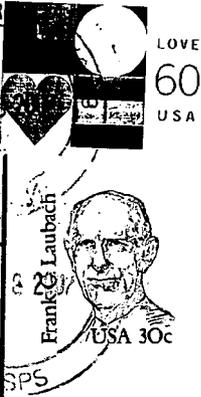
MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE-POSTMASTER

Received For

_____ Ron Z. Opher, Esq.
 _____ Eric M. Berman, P.C.
 985 Old Eagle School Rd. #505
 Wayne, PA 19087

One piece of ordinary mail addressed to:

 Rhonda J. Blair
 963 Frenchville Rd.
 Frenchville, PA 16836



| | | |
|--|---|------------------------------|
| Discover Bank | : | IN THE COURT OF COMMON PLEAS |
| | : | Clearfield COUNTY, PA |
| | : | |
| Plaintiff | : | |
| v. | : | CIVIL ACTION - LAW |
| | : | |
| Rhonda J. Blair 963 Frenchville Rd. Frenchville, PA 16836 | : | NO. 02-354-CD |
| | : | |
| Defendant | : | |

CERTIFICATION OF ADDRESSES AND AFFIDAVIT OF NON-MILITARY SERVICE

COMMONWEALTH OF PENNSYLVANIA :
:SS
COUNTY OF **Clearfield** :

I, Ron Z. Opher, Esquire, being duly sworn according to law, depose and say that I am the attorney for Plaintiff and I am authorized to make this affidavit on Plaintiff's behalf. I hereby certify that the address of the Plaintiff is c/o Eric M. Berman, P.C., 985 Old Eagle School Rd., Suite 505, Wayne, PA 19087. Defendant's address is 963 Frenchville Rd., Frenchville, PA 16836. In addition, Defendant is not in the Military Service of the United States, nor any State or Territory thereof or its allies as defined in the Soldiers' and Sailors' Civil Relief Act of 1940 or the amendments thereto.

I verify that the statements made in the foregoing certification and affidavit are true and correct to the best of my knowledge, information and belief; and I understand that the statements in said certification and affidavit are made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.

DATED: November 8, 2002

BY: 

Ron Z. Opher, Esquire

William A. Shaw
Prothonotary

NOV 13 2002

FILED

*Witness to copy
Shaw & Co*

OFFICE OF THE PROTHONOTARY
COURT OF COMMON PLEAS
Clearfield COUNTY COURTHOUSE
230 E. Market St.
Clearfield, PA 16830

COPIES

TO: **Rhonda J. Blair**
963 Frenchville Rd.
Frenchville, PA 16836

| | | |
|------------------------|---|------------------------------|
| Discover Bank | : | IN THE COURT OF COMMON PLEAS |
| | : | Clearfield COUNTY, PA |
| | : | |
| Plaintiff | : | |
| | : | |
| v. | : | CIVIL ACTION - LAW |
| | : | |
| Rhonda J. Blair | : | NO. 02-354-CD |
| 963 Frenchville Rd. | : | |
| Frenchville, PA 16836 | : | |
| | : | |
| 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.

Prothonotary

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE, PLEASE CALL
RON Z. O'PHER, ESQUIRE, at 610-902-0530.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA
STATEMENT OF JUDGMENT

COPIES

Discover Bank
Plaintiff(s)

No.: 2002-00354-CD

Real Debt: \$4,506.43

Atty's Comm:

Vs.

Costs: \$

Int. From:

Rhonda J. Blair
Defendant(s)

Entry: \$20.00

Instrument: Judgment

Date of Entry: November 13, 2002

Expires: November 13, 2007

Certified from the record this 13th day of November, 2002

William A. Shaw, Prothonotary

SIGN BELOW FOR SATISFACTION

Received on _____, _____, of defendant full satisfaction of this Judgment,
Debt, Interest and Costs and Prothonotary is authorized to enter Satisfaction on the same.

Plaintiff/Attorney