

02-480-CD
CAPITAL ONE BANK -vs- JOSEPH W. LONDON

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CAPITAL ONE BANK,
assignee of Bank of America

CIVIL DIVISION

Plaintiff(s),
v.

No. ~~2002~~ 02-480-CO

JOSEPH W. LONDON
an individual

Defendant(s),

COMPLAINT

Code No. _____

Issue No. _____

Filed on Behalf of:

PLAINTIFF

ATTORNEY OF RECORD FOR THIS PARTY

Louis B. Swartz

PA. ID # 242

SEEWALD, SWARTZ & ASSOCIATES
16th FLOOR LAW AND FINANCE BUILDING
PITTSBURGH, PENNSYLVANIA 15219

(412) 288-0300
28028

NOTE: THIS IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION
OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE

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

CAPITAL ONE BANK,
assignee of Bank of America

Plaintiff(s),

No. 2002

v.

JOSEPH W. LONDON
an individual

Defendant(s),

NOTICE TO DEFEND AND CLAIM RIGHTS

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 days (20) 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 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 OR KNOW A LAWYER, THEN YOU SHOULD GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

PENNSYLVANIA LAWYER REFERRAL SERVICE
100 South Street
P.O. Box 186
Harrisburg, PA 17108

1-800-692-7375

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISIONCAPITAL ONE BANK,
assignee of Bank of America

Plaintiff(s),

No. 2002

v.

JOSEPH W. LONDON
an individual

Defendant(s),

COMPLAINT

1. Plaintiff(s) is CAPITAL ONE BANK, assignee of Bank of America. Plaintiff's address is 456 N KIMBALL PLACE, BOSIE ID 83704.
2. Defendant(s) is JOSEPH W. LONDON an individual. Defendant's address is RD 1 BOX 376, GRAMPIAN PA 16838.
3. Defendant entered into a loan agreement with Plaintiff's assignor, Bank of America, and the account was designated as account number 2222-2510-0001-6592 which has been assigned to Plaintiff for value.
4. Defendant thereafter breached the agreement by failing to make the payments due and there is a balance now owing in the amount of \$6345.72 ever since October 8, 2001.

Attached hereto is a statement of the account which has been presented to Defendant as an account stated and accepted by Defendant.

WHEREFORE, Plaintiff demands Judgment against Defendant(s) in the amount of \$6,345.72 plus interest from October 08, 2001 and costs.



Louis B. Swartz
Attorney for PLAINTIFF
SEEWALD, SWARTZ & ASSOCIATES
16th FLOOR LAW AND FINANCE BUILDING
PITTSBURGH, PENNSYLVANIA 15219

(412) 288-0300

Collection Resource System
Name: LONDON, JOSEPH W
Address: RD1 BOX 376

ATTORNEY

Oct 8, 2001
Master # 956138 SS# 197-54-3437

City, St GRAMPIAN PA 16838
Phone (H) (814) 236-3053 (W) GET PHONE
Employer GET EMPLOYER
E

Status 43 RECOMMEND LEGAL
Coll Unit LC1 LC QUEUE
Strategy None
1 Accounts Totaling 6345.72

Detail of Account					
Date	Time	A/R	Comment		
10/08/01	12:26	TA/AU1	Usr HOC		
AUDIT REVIEW OK SUIT TO SERRY NO			** NEW **		
10/08/01	12:26	CS/10	Usr HOC		
COMMENTS		COMMENTS			
(Page 1)					
C/B N					
10/08/01					
Client#	CAP1AL-L	Recv	10/05/01		
CAPITAL ONE(AUTO LOANS)					
Cur Bal	6345.72	Orig	6345.72		
Costs	0.00	Comm%	27.000%		
CkChg/Fee	0.00	Other	0.00		
Interest	0.00	Int %	0.000%		
Date Lst	10/10/96	Ccd	10/06/01		
Client Acct# 2222251000016592					
Re: HV71H8					
Last Pmt On 00/00/00 For 0.00					

OPTIONS: U pdate Info S scroll Trans M aster C omments-Page

T ransaction P ayments PF1 N ew Account * More

Exhibit 7A

Collection Resource System
Name: LONDON, JOSEPH W
Address: RD1 BOX 376

ATTORNEY

Oct 10, 2001

Master # 956138 SS# 197-54-3437

City, St GRAMPIAN PA 16838
Phone (H) (814) 236-3053 (W) GET PHONE
Employer GET EMPLOYER

Status 43 RECOMMEND LEGAL
Coll Unit LC1 LC QUEUE 5
Strategy None
1 Accounts Totaling 6345.72

Date	Time	A/R	Comment	Usr	Notes for CAP1AL-L
10/08/01	12:26	TA/AU1		HOC	
		AUDIT REVIEW OK SUIT TO SERRY NO			C/O-\$6345.72 ON 10-10-1997
10/08/01	12:26	CS/10		HOC	LST PMT-\$0.00
COMMENTS		COMMENTS (Page 1)			
		C/B N 10/08/01			
		SECURED CARD: N STATUS CODE: A			

OPTIONS: U pdate Info S scroll Trans M aster C omments-Page

T ransaction P aym ents PF1 New Account * More

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISIONCAPITAL ONE BANK,
assignee of Bank of America

Plaintiff(s),

No. 2002

v.

JOSEPH W. LONDON
an individual

Defendant(s),

VERIFICATION

The undersigned, Tracy Ebbes, avers
that the statements of fact contained in the attached
Complaint are true and correct to the best of his/her
information, knowledge and belief, and are made subject
to the penalties of 18 Pa. Cons. Stat. Ann. Section 4904
relating to unsworn falsification to authorities.

Date

3.7.02Tracy Ebbes

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 12312

CAPITAL ONE BANK

02-480-CD

VS.

LONDON, JOSEPH W.

COMPLAINT

SHERIFF RETURNS

NOW APRIL 26, 2002 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURN
THE WITHIN COMPLAINT "NOT FOUND" AS TO JOSEPH W. LONDON,
DEFENDANT. ACCORDING TO MOTHER DEFENDANT LIVES IN ST. MARYS AREA.
ELK COUNTY.

Return Costs

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

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

10.00	SURCHARGE PAID BY; ATTY.
-------	--------------------------

Sworn to Before Me This

30th Day Of April 2002
William A. Shaw

So Answers,



Chester A. Hawkins
Sheriff

FILED
04-587810
APR 30 2002
cc


William A. Shaw
Prothonotary

COPY

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CAPITAL ONE BANK,
assignee of Bank of America

Plaintiff(s),
v.

JOSEPH W. LONDON
an individual

Defendant(s),

CIVIL DIVISION

No. 2~~02~~ 02-480-CO

COMPLAINT

Code No. 02-480-CO

Issue No. _____

Filed on Behalf of:

PLAINTIFF

ATTORNEY OF RECORD FOR THIS PARTY

Louis B. Swartz

PA. ID # 242

SEEWALD, SWARTZ & ASSOCIATES
16th FLOOR LAW AND FINANCE BUILDING
PITTSBURGH, PENNSYLVANIA 15219

(412) 288-0300
28028

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OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE

Attest.

Louis B. Swartz
Prothonotary/
Elder of Courts

MAR 28 2002

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

CAPITAL ONE BANK,
assignee of Bank of America

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No. 2002

v.

JOSEPH W. LONDON
an individual

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CIVIL DIVISIONCAPITAL ONE BANK,
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v.

No. 2002

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WHEREFORE, Plaintiff demands Judgment against Defendant(s) in the amount of \$6,345.72 plus interest from October 08, 2001 and costs.

S-Louis B. Swartz

Louis B. Swartz
Attorney for PLAINTIFF
SEEWALD, SWARTZ & ASSOCIATES
16th FLOOR LAW AND FINANCE BUILDING
PITTSBURGH, PENNSYLVANIA 15219

(412) 288-0300

Collection Resource System
Name: LONDON, JOSEPH W
Address: RD1 BOX 376

ATTORNEY

Oct 8, 2001
Master # 956138 SS# 197-54-3437

City, St GRAMPIAN PA 16838
Phone (H) (814) 236-3053 (W) GET PHONE
Employer GET EMPLOYER
E

Status 43 RECOMMEND LEGAL
Coll Unit LC1 LC QUEUE
Strategy None
1 Accounts Totaling 6345.72

11/14/01
JL
28078

Detail of Account					
Date	Time	A/R	Comment	Usr	
10/08/01	12:26	TA/AU1		HOC	Client# CAP1AL-L Recv 10/05/01 CAPITAL ONE(AUTO LOANS) *
			AUDIT REVIEW OK SUIT TO SERRY NO		** NEW **
10/08/01	12:26	CS/10		HOC	Cur Bal 6345.72 Orig 6345.72 Costs 0.00 Comm% 27.000% CkChg/Fee 0.00 Other 0.00 Interest 0.00 Int % 0.000% Date Lst 10/10/96 Ccd 10/06/01 Client Acct# 2222251000016592 Re: HV71H8 Last Pmt On 00/00/00 For 0.00
COMMENTS		COMMENTS		(Page 1)	
					C/B N 10/08/01

OPTIONS: U pdate Info S scroll Trans M aster C omments-Page

T ransaction P ayments PF1 N ew Account * More

Exhibit 7A4

Collection Resource System
Name: LONDON, JOSEPH W
Address: RD1 BOX 376

ATTORNEY

Oct 10, 2001

Master # 956138 SS# 197-54-3437

City, St GRAMPIAN PA 16838
Phone (H) (814) 236-3053 (W) GET PHONE
Employer GET EMPLOYER

Status 43 RECOMMEND LEGAL
Coll Unit LC1 LC QUEUE 5
Strategy None
1 Accounts Totaling 6345.72

Date	Time	A/R	Comment	Usr	Notes for CAP1AL-L
10/08/01	12:26	TA/AU1	AUDIT REVIEW OK SUIT TO SERRY NO	HOC	C/O-\$6345.72 ON 10-10-1997
10/08/01	12:26	CS/10		HOC	LST PMT-\$0.00 PRINCIPAL: 6345.72 INTEREST: 0.00 COSTS: 0.00 CREDITOR: BANK OF AMERICA
<hr/> COMMENTS		<hr/> COMMENTS (Page 1)			
		C/B N 10/08/01			
		SECURED CARD: N STATUS CODE: A			

OPTIONS: U pdate Info S scroll Trans M aster C omments-Page

T ransaction P aym ents PF1 N ew Account

* More

28028

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

CAPITAL ONE BANK,
assignee of Bank of America

Plaintiff(s),

No. 2002

v.

JOSEPH W. LONDON
an individual

Defendant(s),

VERIFICATION

The undersigned, Tracey Eller, avers
that the statements of fact contained in the attached
Complaint are true and correct to the best of his/her
information, knowledge and belief, and are made subject
to the penalties of 18 Pa. Cons. Stat. Ann. Section 4904
relating to unsworn falsification to authorities.

Date

3.7.02

Tracey Eller

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CAPITAL ONE BANK,
assignee of Bank of America

Plaintiff(s),
v.

JOSEPH W. LONDON
an individual

Defendant(s),

CIVIL DIVISION

No. 2002-480 CD

PRAECIPE TO DISCONTINUE CASE
WITHOUT PREJUDICE

Code No. _____

Issue No. _____

Filed on Behalf of:

PLAINTIFF

ATTORNEY OF RECORD FOR THIS PARTY

Louis B. Swartz

PA. ID # 242

SEEWALD, SWARTZ & ASSOCIATES
16th FLOOR LAW AND FINANCE BUILDING
PITTSBURGH, PENNSYLVANIA 15219

(412) 288-0300
; 28028

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FILED

JAN 13 2003

William A. Shaw
Prothonotary

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

CAPITAL ONE BANK,
assignee of Bank of America

Plaintiff(s),

v.

JOSEPH W. LONDON
an individual

No. 2002-480 CD

Defendant(s),

PRAECIPE TO DISCONTINUE CASE WITHOUT PREJUDICE

TO: THE PROTHONOTARY

Please discontinue the captioned case without prejudice.

ATTORNEY FOR PLAINTIFF

VERIFICATION

I verify that the above Praecep was executed by me for the purposes stated therein. This statement is made subject to the penalties of 18 Pa. Cons. Stat. Ann. section 4904 relating to unsworn falsification to authorities.

FILED

3:12 *BSY*
JAN 13 2003

No cc

TM
Copy of Disc. to CJA
Disc. to AtteSwartz

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

Capital One Bank, assignee of
Bank of America

Vs. No. 2002-00480-CD
Joseph W. London

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 January 13, 2003 marked:

Discontinued without Prejudice

Record costs in the sum of \$80.00 have been paid in full by Louis B. Swartz.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 13th day of January A.D. 2003.

William A. Shaw, Prothonotary