

02-812-CB
ACCOUNT RECOVERY BUREAUS, INC. et al -vs- MELANIE D. HUMBERSON

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

ACCOUNT RECOVERY BUREAUS, INC.
assignee of FIDELITY FEDERAL BANK, FBS

NO. 2002-812 CD
IN CIVIL ACTION

-vs-

Plaintiff(s)

MELANIE D. HUMBERSON

**PRAECIPE FOR DEFAULT
JUDGMENT**

Defendant(s)

CODE -
FILED ON BEHALF OF
PLAINTIFF

**COUNSEL OF RECORD
FOR THIS PARTY:**

James R. Apple, Esq.
PA I.D. No. 37942
Charles F. Bennett, Esq.
PA I.D. No. 30541
Joel E. Hausman, Esq.
PA I.D. No. 42096
APPLE AND APPLE, P.C.
Firm No. 719
4650 Baum Boulevard
Pittsburgh, PA 15213-1237
Telephone (412) 682-1466
Fax (412) 682-3138

FILED

JUL 15 2002

RWAC

M13121 Atty Hausman
William A. Shaw pd 20.00
Prothonotary not to Day
Stat. Atty

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

ACCOUNT RECOVERY BUREAUS, INC.
assignee of FIDELITY FEDERAL BANK, FBS

NO. 2002-812 CD
IN CIVIL ACTION

-vs-

Plaintiff(s)

MELANIE D. HUMBERSON

Defendant(s)

PRAECIPE FOR DEFAULT JUDGMENT

TO THE PROTHONOTARY:

Kindly enter Judgment against the above-named Defendant(s) in Default of an Answer, in the amount of \$2,354.96, computed as follows:

Amount named in Complaint \$ 1,985.50

Interest from June 1, 1999
to July 8, 2002 on \$1,985.50 369.46

Payments	0.00
TOTAL	\$ 2,354.96

I certify that Notice of the intention to enter this Judgment was given pursuant to Pa. R.C.P. 237.1. A copy of said Notice is attached, and was mailed on June 25, 2002 by Regular mail, postage prepaid and, addressed as follows:

Defendant: Melanine D. Humberson
RR 1 Box 315 B
Frenchville, PA 16836

APPLE AND APPLE, P.C.

Dated: 7/9/02

By: James R. Apple
Attorneys for Plaintiff(s)

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

ACCOUNT RECOVERY BUREAUS, INC.
assignee of FIDELITY FEDERAL BANK, FBS

NO. 2002-812 CD
IN CIVIL ACTION

-vs-

Plaintiff(s)

MELANIE D. HUMBERSON

Defendant(s)

Melanine D. Humberson
RR 1 Box 315 B
Frenchville, PA 16836

Date of Notice: June 25, 2002

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. 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.

Court Administrator
Clearfield County Courthouse
One North Second Street
Clearfield, Pennsylvania 16830
Telephone Number 814-765-2641 Ex 50-51

APPLE AND APPLE, P.C.

By:


James R. Apple, Esq.
Attorneys for Plaintiff(s)
4650 Baum Boulevard
Pittsburgh, PA 15213-1237
Telephone (412) 682-1466

COPY

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

**ACCOUNT RECOVERY BUREAUS, INC.
assignee of FIDELITY FEDERAL BANK, FBS**

NO. 2002-812 CD
IN CIVIL ACTION

- 18 -

Plaintiff(s)

MELANIE D. HUMBERSON

Defendant(s)

NOTICE OF JUDGMENT OR ORDER

TO: () Plaintiff Defendant () Garnishee

You are hereby notified that the following Order or Judgment was entered against you on July 15, 2002.

(X) Assumpsit Judgment in the amount of \$2,354.96, plus costs.

Trespass Judgment in the amount of \$ _____.

() If not satisfied within sixty (60) days, your motor vehicle operator's license and/or registration will be suspended by the Dept. of Transportation, Bureau of Traffic Safety, Harrisburg, PA.

(X) Entry of Judgment () Court Order
() Non-Pros
() Confession
(~~X~~) Default
() Verdict
() Arbitration Award
() Other

Melanine D. Humberson
RR 1 Box 315 B
Frenchville, PA 16836

PROTHONOTARY

By: _____
Prothonotary (or Deputy)

COPY

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

Account Recovery Bureaus, Inc.
Fidelity Federal Bank, FSB
Plaintiff(s)

No.: 2002-00812-CD

Real Debt: \$2,354.96

Atty's Comm:

Vs.

Costs: \$

Int. From:

Melanie D. Humberson
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: July 15, 2002

Expires: July 15, 2007

Certified from the record this 15th of July, 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

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 12555

ACCOUNT RECOVERY BUREAUS, INC.

02-812-CD

VS.

HUMBERSON, MELANIE D.

COMPLAINT

SHERIFF RETURNS

NOW MAY 29, 2002 AT 1:47 PM DST SERVED THE WITHIN COMPLAINT ON
MELANIE D. HUMBERSON, DEFENDANT AT RR#1 BOX 315B, FRENCHVILLE,
CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO FRANK HUMBERSON,
HUSBAND A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT
AND MADE KNOWN TO HIM THE CONTENTS THEREOF.

SERVED BY: NEVLING.

Return Costs

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

FILED

JUN 13 2002

019.16
William A. Shaw
Prothonotary

Sworn to Before Me This

12th Day of June 2002
WILLIAM A. SHAW

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

So Answers,

Chester A. Hawkins
My Marilyn Harris
Chester A. Hawkins
Sheriff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

ACCOUNT RECOVERY BUREAUS, INC. NO. 02-812-CO
assignee of FIDELITY FEDERAL BANK, FBS IN CIVIL ACTION

-vs-

Plaintiff(s)

MELANIE D. HUMBERSON

Defendant(s)

COMPLAINT

CODE -
FILED ON BEHALF OF
PLAINTIFF

COUNSEL OF RECORD
FOR THIS PARTY:

James R. Apple, Esq.
PA I.D. No. 37942
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FILED

MAY 20 2002

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

ACCOUNT RECOVERY BUREAUS, INC. NO.
assignee of FIDELITY FEDERAL BANK, FBS IN CIVIL ACTION

-vs- *Plaintiff(s)*

MELANIE D. HUMBERSON

Defendant(s)

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 upon you, 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 OUT
WHERE YOU CAN GET LEGAL HELP.

Court Administrator
Clearfield County Courthouse
One North Second Street
Clearfield, Pennsylvania 16830
Telephone Number 814-765-2641 Ex 50-51

COMPLAINT

1. Plaintiff is a corporation whose address is 555 Van Reed Road, Wyomissing, PA 19610, and, as the assignee of Fidelity Federal Bank, FBS, stands in its assignor's stead, and both are hereinafter referred to interchangeably as "Plaintiff".
2. Defendant is an individual whose address is RR 1 Box 15 B, Frenchville, Clearfield County, Pennsylvania 16836.
3. On or about September 8, 1998, the Defendant applied for and was granted a credit card by the Plaintiff at the terms and conditions agreed upon by the parties, as is more specifically shown by the Application & Agreement, a true and correct copy of which is attached hereto, marked Exhibit "A" and made a part hereof.
4. Plaintiff avers that the transaction was based upon a written agreement, a copy of which could not, after diligent search be located for attachment.
5. Defendant made purchases and/or received cash advances using said credit card.
6. Thereafter, in breach of obligations under the Agreement, the Defendant failed to make payments as they became due.
7. Plaintiff avers that the terms of the Agreement provide for acceleration of the entire balance due and owing upon Defendant's breach of the Agreement.
8. Plaintiff avers that the balance due amounts to \$1,985.50.
9. Plaintiff avers that interest has accrued at the rate of 6% per annum on the balance due from June 1999.

10. All conditions precedent to Assignor's right to be paid under the term of the contract have occurred.

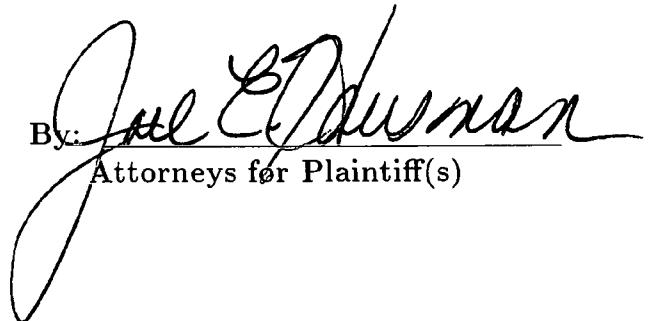
11. Although repeatedly requested to do so by Plaintiff, Defendant has willfully failed and refused to pay the amount due Plaintiff or any part thereof.

WHEREFORE, Plaintiff demands Judgment against Defendant(s) in the principal amount of \$1,985.50, with appropriate additional interest from June 1999, plus attorneys fees and costs.

APPLE AND APPLE, P.C.

By:

Attorneys for Plaintiff(s)

A handwritten signature in black ink, appearing to read "Joel E. Dawson". The signature is fluid and cursive, with a large, stylized 'J' at the beginning.



Dealer Use Only

 Fund with ADC Do Not Fund with ADC

22033

 Dealer # **8338** Sales Rep # **115**

Applicant Information

A R 450373532 HUMBERSON, MELANIE

MELANIE	HUMBERSON	814-263-4652
First Name	M.I. Last Name	Home Phone Number
RR#1	BOX 315B	450-37-3532
Street Number	Street Name	Apartment Number
FRENCHVILLE		PA 16836
City	State	Zip Code

Do You Own Your Home? Yes No

Best Time to Call for VERIFICATION
 AM PM

Employment Information

WALMART DIST CENTER	Years Worked at Company	4	814-857-4411
LABOR	Years	4	Employer Phone Number
\$ 1,400 Monthly Gross Income			

Present Employer

Current Position

*Alimony, child support or separate maintenance income need not be included if you do not wish to have it considered as a basis for paying this obligation

Reference Information (closest relative not living with you)

BETTY	MARTELU	814-263-4053
First Name	M.I. Last Name	Home Phone Number
RR#1	Box 292	Apartment Number
Street Number	Street Name	
FRENCHVILLE		PA 16836 mom
City	State	Zip Code

Relationship to Applicant

Authorized Signer Information (for a second card on this account)

First Name	M.I. Last Name	Social Security Number
------------	----------------	------------------------

Please Sign This Authorization

By signing below, I request a credit card to be issued by Fidelity Federal Bank FSB and I understand that in extending credit, Fidelity Federal Bank FSB and American Direct Credit LLC are relying on the foregoing application and financial information, which I assure you is accurate and complete. Fidelity Federal Bank FSB and American Direct Credit LLC reserve the right to request additional financial information. Fidelity Federal Bank FSB and American Direct Credit LLC are authorized to check my credit, employment and salary history and to disclose credit information to the person from whom I am purchasing merchandise. If approved, I agree to abide by the terms of the Cardmember Agreement and Disclosure Statement which I received prior to making this application. I understand that no purchase is necessary in order to apply for or obtain the credit card, that my purchase does not guarantee that a card will be issued and that the card can be used to obtain advances and purchases in addition to the purchase identified below subject to the terms and conditions of the Cardmember Agreement. I also understand that Fidelity Federal Bank FSB is not related by common ownership or control with the dealer or American Direct Credit LLC. If I subsequently desire to make an electronic payment to my credit card account and give oral notice to Fidelity Federal Bank FSB of the amount to be withdrawn, the name of my bank, and the account number of my checking account, I hereby authorize Fidelity Federal Bank FSB to withdraw that amount from the specified account to be applied to my credit card account, subject to applicable law.

Melanie Humberson 9-8-98
Applicant Signature Date

Charge Authorization

If my application for the credit card is approved, I hereby authorize GENCO (Dealership Name), to charge to my card account the amount shown below for the purchase of KIRBY (Name of Product).

\$ 1,746.88

Amount to be charged to my MasterCard®. *Melanie Humberson 9-8-98*
Applicant Signature Date

Automatic Payment Authorization (send this copy to American Direct Credit LLC)

If my application for a credit card to be issued by Fidelity Federal Bank FSB is approved, I hereby authorize Fidelity Federal Bank FSB to withdraw the following amount each month from the checking account listed below to be applied to my credit card account (check one):

Pay the minimum amount due on my credit card account. Pay \$ or the minimum amount due on my credit card account, whichever is greater, but not to exceed the remaining balance.

I represent that I am the only authorized signer on the checking account or, if there is more than one signer, that I can obtain withdrawals from the checking account on my signature alone. This authorization will remain in effect until 30 days after either Fidelity Federal Bank FSB or I receive from the other written notice of cancellation, provided that this provision does not limit any rights I may have under federal law to stop payment on a preauthorized electronic fund transfer.

You must attach a voided check for this account to the back of this form.

Bank Name

Applicant Signature Date

Bank Account Number



American Direct Credit LLC
PO Box 7338
Boise, ID 83707-1338

800-500-2331 For Credit Verification
208-395-8380 Faxed Applications



BANK PLUS CREDIT SERVICES**HUMBERSON,MELANIE D****Account Number 5490620150438795****Charge Off Balance: \$1,985.50**

Stat Date	TransDate	PostDate	Reference	Description			TransAmt
1998-10			*FINANCE CHARGE* P	URCHASES	\$30.48	CASH ADVANCE	\$0.00
1998-10	1005	1005	F826500M6000N8000	ANNUAL FEE 10/98 THROUGH 09/99			\$50.00
1998-10	1024	1024	8549062MS00XSNSV	PAYMENT - THANK YOU			(\$50.00)
1998-11			*FINANCE CHARGE* P	URCHASES	\$29.69	CASH ADVANCE	\$0.00
1998-12			*FINANCE CHARGE* P	URCHASES	\$29.69	CASH ADVANCE	\$0.00
1998-12	1228	1228		LATE FEE			\$10.00
1999-01			*FINANCE CHARGE* P	URCHASES	\$29.69	CASH ADVANCE	\$0.00
1999-02			*FINANCE CHARGE* P	URCHASES	\$29.69	CASH ADVANCE	\$0.00
1999-03			*FINANCE CHARGE* P	URCHASES	\$29.69	CASH ADVANCE	\$0.00
1999-04			*FINANCE CHARGE* P	URCHASES	\$29.69	CASH ADVANCE	\$0.00
1999-04	0426	0426		LATE FEE			\$10.00
1999-05	0523	0523		LATE FEE			\$10.00
1999-05	0523	0523	F8265004F00999990	CHARGE OFF ACCOUNT *FINANCE CHARGES*			(\$288.62)
1999-05	0523	0523	F8265004F00999990	CHARGE OFF ACCOUNT-PRINCIPALS			(\$1696.88)

41440

AFFIDAVIT

I, Harry Albert, of
Accounts Recovery Bureau, Inc., Plaintiff
herein, verify that the statements of fact contained in the foregoing Complaint
are true and correct. I understand that false statements herein are made
subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsification
to authorities.

04-01-02

Date

Harry M Albert
AffiantVice President Collections
Title555 Van Reed Rd

Address

Wyomissing Pa 19610
City, State and Zip

FILED

MAY 20 2002

100
M 13 10/01/02 Apple PQ 80,00
William A. Shaw
Prothonotary

ICC Sheng