

03-353-CD  
DISCOVER BANK -vs- DARYL B. CARR

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

DISCOVER BANK BY ITS AGENTS DISCOVER  
FINANCIAL SERVICES INC.

Plaintiff No. 03-353-cv

vs. COMPLAINT IN CIVIL ACTION

DARYL B. CARR

Defendant FILED ON BEHALF OF  
Plaintiff

COUNSEL OF RECORD OF  
THIS PARTY:

William T. Molczan, Esquire  
PA I.D. #47437  
WELTMAN, WEINBERG & REIS CO., L.P.A.  
2718 Koppers Building  
436 Seventh Avenue  
Pittsburgh, PA 15219  
(412) 434-7955

WWR#02847173

**FILED**

MAR 13 2003

William A. Shaw  
Prethernotary

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

DISCOVER BANK BY ITS AGENTS DISCOVER  
FINANCIAL SERVICES INC.

Plaintiff

vs.

Civil Action No.

DARYL B. CARR

Defendant

**COMPLAINT IN CIVIL ACTION AND 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 an 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

LAWYER REFERRAL SERVICE  
PA Bar Association  
P.O. Box 186  
Harrisburg, PA 17108  
1-800-692-7375

COMPLAINT

1. Plaintiff is a corporation with offices at 3311 Mill Meadow Drive, Hilliard, OH 43026.
2. Defendant is an adult individual residing at 312 Spring Avenue, Du Bois, PA 15801.
3. Defendant applied for and received a credit card issued by Plaintiff 's bearing the account number 6011-0024-4853-5294.
4. Defendant made use of said credit card and has currently a balance due and owing to Plaintiff, as of February 20, 2003, in the amount of \$2,153.41, as shown by Plaintiff's Statement of Account attached hereto, marked as Exhibit "1" and made a part hereof.
5. Defendant is in default of the terms of the cardholder Agreement having not made monthly payments to Plaintiff thereby rendering the entire balance immediately due and payable.
6. Although repeatedly requested to do so by Plaintiff, Defendant has willfully failed and/or refused to pay the principal balance, finance charges or any part thereof to Plaintiff.

WHEREFORE, Plaintiff demands Judgment in its favor and against Defendant, Daryl B. Carr individually, in the amount of \$2,153.41 with interest at the legal interest rate of 6% per annum from date of judgment plus costs.

**THIS IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION OBTAINED  
SHALL BE USED FOR THAT PURPOSE.**

WELTMAN, WEINBERG & REIS, CO., L.P.A.



William T. Molczan, Esquire  
PA I.D. #47437

WELTMAN, WEINBERG & REIS CO., L.P.A.  
2718 Koppers Building  
436 Seventh Avenue  
Pittsburgh, PA 15219  
(412) 434-7955

WWR#:02847173

VERIFICATION

The undersigned does hereby verify subject to the penalties of 18 P.A.C.S. §4904 relating to  
unsworn falsifications to authorities, that he/she is Robert Adkins  
(Name)

Accounts Manager of Discover Financial Services Inc., servicing agent of the plaintiff herein, that  
(Title) Discover Financial Services Inc. (Company)

he/she is duly authorized to make this Verification, and that the facts set forth in the foregoing Complaint  
in Complaint are true and correct to the best of his/her knowledge, information and belief.

Robert Adkins  
(Signature)

WWR#\_\_\_\_\_

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

DISCOVER BANK BY ITS AGENTS DISCOVER  
FINANCIAL SERVICES INC.

Plaintiff No. 03-353-CD

vs. PRAECLP TO SETTLE, DISCONTINUE & END

DARYL B. CARR

Defendant

FILED ON BEHALF OF  
Plaintiff

**COUNSEL OF RECORD OF  
THIS PARTY:**

William T. Molczan, Esquire  
P.A. I.D.#47437  
WELTMAN, WEINBERG & REIS CO., L.P.A.  
2718 Koppers Building  
436 Seventh Avenue  
Pittsburgh, PA 15219  
(412) 434-7955

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MAY 09 2003

William A. Shaw  
Prethenotary

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

DISCOVER BANK BY ITS AGENTS DISCOVER  
FINANCIAL SERVICES INC.

Plaintiff

vs.

Civil Action No. 03-353-CD

DARYL B. CARR

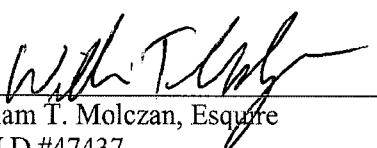
Defendant

**PRAECIPE TO SETTLE DISCONTINUE AND END**

TO THE PROTHONOTARY OF COUNTY:

Please kindly Settle Discontinue and End the above captioned matter upon the records of the Court and  
mark the cost paid.

WELTMAN, WEINBERG & REIS CO., L.P.A.

By:   
William T. Molczan, Esquire  
PA. I.D.#47437  
WELTMAN, WEINBERG & REIS CO., L.P.A.  
2718 Koppers Building  
436 Seventh Avenue  
Pittsburgh, PA 15219  
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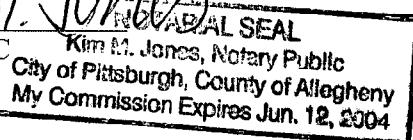
Sworn to and subscribed

Before me the 5th

Day of May, 2003



NOTARY PUBLIC



IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

COPY

Discover Bank by its agents  
Discover Financial Services, Inc.

Vs.  
Daryl B. Carr

No. 2003-00353-CD

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 May 9, 2003, marked:

Settled, Discontinued, and Ended

Record costs in the sum of \$85.00 have been paid in full by William T. Molczan, Esq.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 9th day of May A.D. 2003.

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William A. Shaw, Prothonotary

**In The Court of Common Pleas of Clearfield County, Pennsylvania**

Sheriff Docket # 13793

DISCOVER BANK

03-353-CD

VS.

CARR, DARYL B.

**COMPLAINT**

**SHERIFF RETURNS**

NOW MARCH 18, 2003 AT 10:00 AM SERVED THE WITHIN COMPLAINT ON DARYL B. CARR, DEFENDANT AT RESIDENCE, 312 SPRING AVE. DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO SUSAN CARR, WIFE, A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN TO HER THE CONTENTS THEREOF.

SERVED BY: COUDRIET/RYEN

**FILED**

*18 MAY 19 2003  
02:40 PM*  
William A. Shaw  
Prothonotary/Clerk of Courts

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**Return Costs**

Cost	Description
30.72	SHERIFF HAWKINS PAID BY: ATTY CK# 8084820
10.00	SURCHARGE PAID BY: ATTY Ck#8084824

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Sworn to Before Me This

19 Day Of March 2003

WILLIAM A. SHAW  
Prothonotary

My Commission Expires  
1st Monday in Jan. 2006  
Clearfield Co., Clearfield, PA

So Answers,

*Chester Hawkins  
by Marley Hamer*  
Chester A. Hawkins  
Sheriff