

03-1826-CD
DISCOVER BANK vs. GABRIELLE B. LYNCH

Our File No. 180740
ATTORNEYS FOR PLAINTIFF
ERIC M. BERMAN, P.C.
BY: Eric M. Berman, Esquire, I.D. 83698
BY: Robert M. Kline, Esquire, I.D. 56479
198 Allendale Road, Suite 306
King of Prussia, PA 19406
(610) 265-7720

COURT OF COMMON PLEAS
COUNTY OF CLEARFIELD

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

TRIAL DIVISION
CIVIL ACTION

vs.

Term

GABRIELLE B LYNCH
909 S 4TH ST
CLEARFIELD, PA 16830 2009

No. 03-1826-CJ

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 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 TO FIND OUT WHERE YOU CAN GET LEGAL HELP. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

LAWYER REFERENCE SERVICE
COUNTY OF CLEARFIELD BAR ASSOCIATION
P.O. BOX 186
HARRISBURG, PA 17108
800-692-7375

FILED

DEC 11 2003

William A. Shaw
Prothonotary Clerk of Courts

Our File No. 180740
ATTORNEYS FOR PLAINTIFF
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BY: Eric M. Berman, Esquire, I.D. 83698
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King of Prussia, PA 19406
(610) 265-7720

-----X
DISCOVER BANK
c/o ERIC M. BERMAN, P.C.
198 Allendale Road, Suite 306
King of Prussia, PA 19406
vs.
GABRIELLE B LYNCH
909 S 4TH ST
CLEARFIELD, PA 16830 2009

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

COMPLAINT

1. Plaintiff, DISCOVER BANK ,
is a DELAWARE STATE BANK
authorized to do business in the Commonwealth of Pennsylvania with
its place of business at 3311 MILL MEADOW DRIVE, HILLIARD, OH 43026.

2. The Defendant(s), GABRIELLE B LYNCH ,
resides at 909 S 4TH ST , CLEARFIELD, PA 16830-2009.

3. There is due from the Defendant(s) the sum of \$4,651.67 for
credit extended by Plaintiff to Defendant(s), acct. no. 6011002960362176,
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.

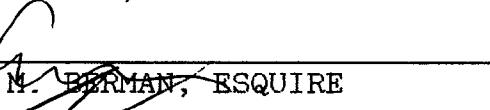
4. The Plaintiff has made demand upon the Defendant(s) for payment
of monies in the sum of \$4,651.67 advanced to Defendant(s) through
Defendant(s) use of the above-referenced credit account, but Defendant(s)
has failed and refused to pay the said sum or any part thereof.

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 \$4,651.67
plus interest, attorneys fees and costs which are justly due and
owing from the Defendant(s) to the Plaintiff.

ERIC M. BERMAN, P.C.

Dated: OCTOBER 26, 2003

BY: 
ERIC M. BERMAN, ESQUIRE

BY: 
ROBERT M. KLINE ESQUIRE

VERIFICATION

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/or Robert M. Kline, Esquire, being duly sworn according to law, deposes and says that he is an associate attorney with said firm, and as said attorney, 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



ROBERT M. KLINE, ESQUIRE

Dated: OCTOBER 26, 2003

SPACEBNW-ZN

In The Court of Common Pleas of Clearfield County, Pennsylvania

DISCOVER BANK

VS.

LYNCH, GABRIELLE B.

COMPLAINT

Sheriff Docket # 14927

03-1826-CD

SHERIFF RETURNS

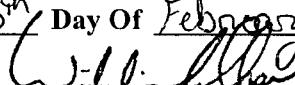
NOW DECEMBER 26, 2003 AT 10:25 AM SERVED THE WITHIN COMPLAINT ON GABRIELLE B. LYNCH, DEFENDANT AT RESIDENCE, 909 S. 4TH ST., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO GABRIELLE B. LYNCH A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN TO HER THE CONTENTS THEREOF.

SERVED BY: COUDRIET/RYEN

Return Costs

Cost	Description
20.00	SHERIFF HAWKINS PAID BY: ATT Ck# 15870
10.00	SURCHARGE PAID BY: ATTY CK# 15871

Sworn to Before Me This

13th Day Of February 2004


WILLIAM A. SHAW 2004
Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

So Answers,



Chester A. Hawkins
Sheriff

FILED
02/5/04
FEB 13 2004
E

William A. Shaw

Prothonotary/Clerk of Courts

ATTORNEYS FOR PLAINTIFF

ERIC M. BERMAN, P.C.

BY: Eric M. Berman, Esquire, I.D. 83698

BY: Robert M. Kline, Esquire, I.D. 56479

198 Allendale Road, Suite 306

King of Prussia, PA 19406

(610) 265-7720

OP

COURT OF COMMON PLEAS
COUNTY OF CLEARFIELD

DISCOVER BANK

c/o ERIC M. BERMAN, P.C.

198 Allendale Road, Suite 306

King of Prussia, PA 19406

TRIAL DIVISION

CIVIL ACTION

vs.

Term

GABRIELLE B LYNCH

909 S 4TH ST

CLEARFIELD, PA 16830 2009

X

No. 03-1826-CW

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LAWYER REFERENCE SERVICE
COUNTY OF CLEARFIELD BAR ASSOCIATION
P.O. BOX 186
HARRISBURG, PA 17108
800-692-7375

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

DEC 11 2003

Attest.

John J. Coughlin
Prothonotary/
Clerk of Courts

1267

DEPUTY SHERIFF'S EDUCATION & TRAINING ACCT.

COURT No. 03-1826-C

DATE Dec 16 2003

RECEIVED OF Illusion \$ 10.00

Vs. Lynch

COMPLAINT ✓ PAID Atty ck# 15871

SUMMONS

EXECUTION

DEC 16 2003

PETITIONS

OTHER

myHawn

CHESTER A. HAWKINS, SHERIFF
CLEARFIELD COUNTY, PENNSYLVANIA

Our File No. 180740
ATTORNEYS FOR PLAINTIFF
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BY: Robert M. Kline, Esquire, I.D. 56479
198 Allendale Road, Suite 306
King of Prussia, PA 19406
(610) 265-7720

-----X-----
DISCOVER BANK : COURT OF COMMON PLEAS
: COUNTY OF CLEARFIELD
c/o ERIC M. BERMAN, P.C. : CIVIL ACTION
198 Allendale Road, Suite 306 : Term _____
King of Prussia, PA 19406 :
vs. : No.
: _____
: _____
GABRIELLE B LYNCH
909 S 4TH ST
CLEARFIELD, PA 16830 2009

-----X-----
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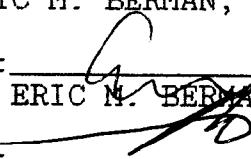
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ERIC M. BERMAN, P.C.

Dated: OCTOBER 26, 2003

BY:


ERIC M. BERMAN, ESQUIRE

BY:


ROBERT M. KLINE ESQUIRE

SPACEBNW-ZN

Attorneys for Plaintiff

VERIFICATION

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/or Robert M. Kline, Esquire, being duly sworn according to law, deposes and says that he is an associate attorney with said firm, and as said attorney, 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



ROBERT M. KLINE, ESQUIRE

Dated: OCTOBER 26, 2003

SPACEBNW-ZN

Our File No. 180740
ATTORNEYS FOR PLAINTIFF
ERIC M. BERMAN, P.C.
By: Eric M. Berman, Esquire, I.D. 83698
By: Robert M. Kline, Esquire, I.D. 56479
198 Allendale Road, Suite 306
King of Prussia, PA 19406
(610) 265-7720

-----X
DISCOVER BANK : COURT OF COMMON PLEAS
c/o ERIC M. BERMAN, P.C. : COUNTY OF CLEARFIELD
198 Allendale Road, Suite 306 : TRIAL DIVISION
King of Prussia, PA 19406 : CIVIL ACTION
vs. :
: No. 2003-01826-CD
GABRIELLE B LYNCH :
-----X

TO: GABRIELLE B LYNCH
909 S 4TH ST
CLEARFIELD, PA 16830-2009

NOTICE

Pursuant to Rule 236 of the Supreme Court of Pennsylvania, you are hereby notified that a JUDGMENT BY DEFAULT has been entered against you in the above proceeding and that enclosed herewith is a copy of all the (record) documents filed in support of the said JUDGMENT.

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE, PLEASE CALL:
ERIC M. BERMAN, P.C., Attorneys at Law.
Attention: Eric M. Berman, Esquire, or Robert M. Kline, Esquire,
at this telephone number. 1-610-265-7720.

PROTHONOTARY



MAR 17 2004

William C. Gray
Prothonotary

Our File No. 180740
ATTORNEYS FOR PLAINTIFF
ERIC M. BERMAN, P.C.
BY: Eric M. Berman, Esquire, I.D. 83698
BY: Robert M. Kline, Esquire, I.D. 56479
198 Allendale Road, Suite 306
King of Prussia, PA 19406
(610) 265-7720

-----X : COURT OF COMMON PLEAS
: COUNTY OF CLEARFIELD

DISCOVER BANK : TRIAL DIVISION
c/o ERIC M. BERMAN, P.C. : CIVIL ACTION
198 Allendale Road, Suite 306 :
King of Prussia, PA 19406 :
vs. : No. 2003-01826-CD
: :
GABRIELLE B LYNCH :
:-----X

PRAECIPE TO ENTER DEFAULT JUDGMENT

TO THE PROTHONOTARY:

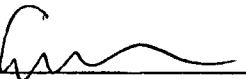
Please enter a default judgment in favor of Plaintiff,
DISCOVER BANK ,
and against Defendant, GABRIELLE B LYNCH ,
for failure to answer or otherwise respond to the Complaint - Civil
Action.

The Complaint was served upon Defendant on 12/26/2003,
by the Sheriff's Office of COUNTY OF CLEARFIELD County.

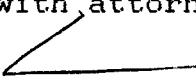
A copy of the Notice of Intention to Take Default served upon
the Defendant by regular mail on *March 3, 2004*
is attached hereto as Exhibit B.

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.

Assess damages in the principal amount of \$4,651.67, being
the amount demanded in the Complaint, together with attorneys fees
and court costs.



ERIC M. BERMAN, P.C.
Attorneys for Plaintiff
By: Eric M. Berman, Esquire



ERIC M. BERMAN, P.C.
Attorneys for Plaintiff
By: Robert M. Kline, Esquire

SPACEJUB-ZH

Case File No. 180740
ATTORNEYS FOR PLAINTIFF
ERIC M. BERMAN, P.C.
c/o Eric M. Berman, Esquire, I.D. 83698
BY: Robert M. Kline, Esquire, I.D. 58479
198 Allendale Road, Suite 306
King of Prussia, PA 19406
(610) 265-7720

COURT OF COMMON PLEAS
COUNTY OF CLEARFIELD

DISCOVER BANK :
c/o ERIC M. BERMAN, P.C. : TRIAL DIVISION
198 Allendale Road, Suite 212 :
King of Prussia, PA 19406 : CIVIL ACTION
vs. : No. 2003-01826-CD
GABRIELLE B LYNCH :
-----X

NOTICE OF INTENTION TO TAKE DEFAULT JUDGMENT

TO: GABRIELLE B LYNCH
909 S 4TH ST
CLEARFIELD, PA 16830-2009

DATE OF NOTICE: 11/13/2004

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 YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

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COUNTY OF CLEARFIELD BAR ASSOCIATION
P.O. BOX 186
HARRISBURG, PA 17108
600-692-7375

Eric M. Berman, P.C.
ERIC M. BERMAN, P.C.
Attorneys for Plaintiff
By: Eric M. Berman, Esquire

Robert M. Kline, Esquire
ERIC M. BERMAN, P.C.
Attorneys for Plaintiff
By: Robert M. Kline, Esquire

SPACEJUD-ZH

Our File No. 180740
ATTORNEYS FOR PLAINTIFF
ERIC M. BERMAN, P.C.
By: Eric M. Berman, Esquire, I.D. 8369
By: Robert M. Kline, Esquire, I.D. 5647
198 Allendale Road, Suite 306
King of Prussia, PA 19406
(610) 265-7720

-----X----- COURT OF COMMON PLEAS
DISCOVER BANK : COUNTY OF CLEARFIELD
c/o ERIC M. BERMAN, P.C. : TRIAL DIVISION
198 Allendale Road, Suite 306 : CIVIL ACTION
King of Prussia, PA 19406 :
: vs. : No. 2003-01826-CD
: :
: GABRIELLE B LYNCH :
-----X-----

CERTIFICATION OF NON-MILITARY SERVICE

I am one of Plaintiff's attorneys and am authorized to make this certification on Plaintiff's behalf.

The above named Defendant(s) is (are) over 18 years of age and reside at 909 S 4TH ST , CLEARFIELD, PA 16830 2009.

The occupation of the Defendant(s) is (are) unknown.

The Defendant(s) is (are) 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.

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

ERIC M. BERMAN, ESQUIRE
ATTORNEY FOR PLAINTIFF
SPACEJUB-ZK

ROBERT M. KLINE, ESQUIRE
ATTORNEY FOR PLAINTIFF

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-----X COURT OF COMMON PLEAS
COUNTY OF CLEARFIELD
:
DISCOVER BANK :
c/o ERIC M. BERMAN, P.C. : TRIAL DIVISION
198 Allendale Road, Suite 306 : CIVIL ACTION
King of Prussia, PA 19406 :
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vs. : No. 2003-01826-CD
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GABRIELLE B LYNCH :
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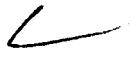
CERTIFICATION OF ADDRESSES

TO THE PROTHONOTARY:

The address of the Plaintiff, Judgment Creditor, is c/o
Eric M. Berman, P.C., 198 Allendale Road, Suite 306, King of
Prussia, PA 19406.

The last known address of the Defendant, Judgment Debtor, is
909 S 4TH ST , CLEARFIELD, PA 16830 2009.


Eric M. Berman, P.C.
Attorneys for Plaintiff
By: Eric M. Berman, Esquire
SPACEJUB-ZH


Eric M. Berman, P.C.
Attorneys for Plaintiff
By: Robert M. Kline, Esquire

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

Discover Bank
Plaintiff(s)

No.: 2003-01826-CD

Real Debt: \$4,651.67

Atty's Comm: \$

Vs.

Costs: \$

Gabrielle B. Lynch
Defendant(s)

Int. From: \$

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: March 17, 2004

Expires: March 17, 2009

Certified from the record this 17th day of March, 2004

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