

04-1008-CD
CITIBANK

VS

JEFFREY L REISH

BURTON NEIL & ASSOCIATES, P.C.

By: Burton Neil

Identification No. 11348

1060 Andrew Drive, Suite 170

West Chester, PA 19380

610-696-2120

Attorney for Plaintiff

FILED

JUL 01 2004

William A. Shaw
Prothonotary/Clerk of Courts

CITIBANK (SOUTH DAKOTA) N.A.

701 EAST 60th STREET NORTH

SIOUX FALLS, SD

Plaintiff

: IN THE COURT OF COMMON PLEAS

: CLEARFIELD COUNTY, PENNSYLVANIA

v.

JEFFREY L REISH

804 MOWERY RIDGE ROAD

FRENCHVILLE, PA

Defendant

: NO. 04-1008-CD

: CIVIL ACTION - LAW

COMPLAINT

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 (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 claim 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, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. 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 AND INFORMATION SERVICE

Court Administrator
Clearfield County Courthouse,
Clearfield, PA 16830
814-765-2641
10007.034.6980

BURTON NEIL & ASSOCIATES, P.C.
By: Burton Neil
Identification No. 11348
1060 Andrew Drive, Suite 170
West Chester, PA 19380
610-696-2120
Attorney for Plaintiff

CITIBANK (SOUTH DAKOTA) N.A.
701 EAST 60th STREET NORTH
SIOUX FALLS, SOUTH DAKOTA
Plaintiff

: IN THE COURT OF COMMON PLEAS
:
: CLEARFIELD COUNTY, PENNSYLVANIA

v.

: NO.

JEFFREY L REISH
804 MOWERY RIDGE ROAD
FRENCHVILLE, PENNSYLVANIA

Defendant

: CIVIL ACTION - LAW

Complaint

1. The plaintiff is Citibank (South Dakota) N.A., with place of business located at 701 East 60th Street North, Sioux Falls, South Dakota.
2. The defendant is JEFFREY L REISH, who resides at 804 MOWERY RIDGE ROAD FRENCHVILLE, CLEARFIELD County, Pennsylvania.
3. Plaintiff, a national banking association, engages in various types of banking business including consumer lending through the issuance of credit cards.
4. Plaintiff furnished consumer credit to the defendant by means of a credit card with an account number 5423796021220851 hereinafter referred to as the credit card account.
5. Plaintiff maintained an accurate and running record of all debits and credits to the credit card account in its books of account.
6. Plaintiff mailed defendant a written statement each month which accurately stated the debits and credits to the credit card account for the prior billing cycle.
7. Defendant received the monthly statements from plaintiff for the credit card account, including the statement attached as Exhibit A, without protest, dispute or objection.

8. Defendant, by not protesting, disputing, or objecting to the statements including the Exhibit A statement, thereby assented and agreed to the correctness of the balance due on the credit card account so as to constitute an account stated.

9. The amount due plaintiff on the account stated less credits, if any issued subsequent to the Exhibit A statement, is \$2111.50

Wherefore, plaintiff demands judgment against the defendant for the sum of \$2111.50 and the costs of this action.

BURTON NEIL & ASSOCIATES, P.C.

By: 

Burton Neil, Esquire

Attorney for Plaintiff

In making this communication, we advise our firm is a debt collector.

12/01/03

\$2111.91

\$9999.99

SITE:KC-CL

TM:CO-5000

ACID:KCB3074

PMT DUE DATE

NEW BALANCE

MIN AMT DUE

01/28/04

20:14:14:

JEFFREY L REISH
ATTNY ACCOUNT-CODE=PCZ9
LEWISTOWN
17044-3324000

PA

P.O. BOX 8102
S HACKENSACK, NJ
07606-8102

CHOICE®

For Customer Service, call or write
1-800-925-8871

Account Number
5423 7960 2122 0851

Payment must be received by 1:00 pm local time on 12/01/2003

To report billing errors, write
to this address; calling will
not preserve your rights.

BOX 6248
SIOUX FALLS, SD
57117

Statement/Closing Date	Total Credit Line	Available Credit Line	Cash Advance Limit	Available Cash Limit	New Balance
11/04/2003	\$1500	\$0	\$750	\$0	\$2111.91
		Amount Over Credit Line	Past Due	Purch/Adv Minimum Due	Minimum Amount Due
		\$611.91	\$510.00	\$49.00	\$2111.91

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
	11/04		Standard Purch PURCHASES*FINANCE CHARGE*PERIODIC RATE 84 0000 0	41.39 70000000000

Help is available! Please call the toll-free
number shown above to learn about our special
payment options. Call Monday - Friday, 7 am to
9 pm, or Saturday, 8 am to 5 pm, Central Time.
Please give us the opportunity to assist you.

Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(=) New Balance
PURCHASES	\$2,070.52	\$0.00	\$0.00	\$41.39	\$2,111.91
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$2,070.52	\$0.00	\$0.00	\$41.39	\$2,111.91

Days This Billing Period: 29

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$2,070.52	1.99917%(M)	23.990%	23.990%
ADVANCES				
Standard Adv	\$0.00	0.06573%(F)	23.990%	23.990%

SEND PAYMENTS TO:

1735

PLEASE REFER TO THE REVERSE SIDE OF THE ORIGINAL STATEMENT FOR PAYMENT INFORMATION.

Make check or money order payable in U.S. dollars on a U.S. bank to Citi Cards. Include account number on check or money order. No cash please.

EXHIBIT

A

Verification

Jennifer Sisson is an attorney management specialist for Citibank (South Dakota), N.A. and Citicorp Credit Services, Inc., wholly owned subsidiaries of Citigroup, the within Plaintiff in this action. She/he verifies that the statements of fact made in the foregoing Complaint are true and correct to the best of her knowledge and belief. The undersigned understands that the statements made herein are subject to the penalties of 18 Pa. C.S. Section 4904, relating to unsworn falsification to authorities.

Date: 6/15/04

Jennifer Sisson
Name

Account number: 5423796021220851
Defendant: JEFFREY L REISH

(KMC)

FILED

Att'y P.D.

09/4:00 ~~201~~

85.00

JUL 01 2004

100 Att'y

William A. Shaw
Prothonotary/Clerk of Courts

In The Court of Common Pleas of Clearfield County, Pennsylvania

CITIBANK

VS.

REISH, JEFFREY L.

COMPLAINT

Sheriff Docket # 15918
04-1008-CD

SHERIFF RETURNS

NOW JULY 26, 2004 AT 9:41 AM SERVED THE WITHIN COMPLAINT ON JEFFREY L. REISH, DEFENDANT AT RESIDENCE, 804 MOWERY RIDGE ROAD, FRENCHVILLE, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO DANA REISH, WIFE A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN TO HER THE CONTENTS THEREOF.

SERVED BY: NEVLING/HUNTER

Return Costs

Cost	Description
30.37	SHERIFF HAWKINS PAID BY: ATTY CK# 19860
10.00	SURCHARGE PAID BY: ATTY CK# 19861

Sworn to Before Me This

29 Day Of July 2004

William A. Shaw

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

So Answers,

Chester A. Hawkins
by Mandy Harris

Chester A. Hawkins
Sheriff

FILED

6/1:36pm
JUL 29 2004
EAS

William A. Shaw
Prothonotary

CITIBANK (SOUTH DAKOTA) N.A.
701 East 60th Street North
Sioux Falls, SD 57117
Plaintiff

: IN THE COURT OF COMMON PLEAS
: CLEARFIELD COUNTY, PENNSYLVANIA

VS.

: NO. 04-1008-CD

JEFFREY L REISH
804 Mowery Ridge Road
Frenchville, PA 16836
Defendant

: CIVIL ACTION - LAW

FILED
*m 1:46 SA Notice to Def
stint to atty.*
SEP 27 2004

Praeipe for Default Judgment

William A. Shaw
Prothonotary

To the Prothonotary:

Please enter judgment by default for want of an answer in the above case in favor of the plaintiff and against the defendant, and assess damages as follows:

Principal:	\$2,111.50
Credit:	-0.00
TOTAL	\$2,111.50

Understanding that false statements herein made are subject to penalty under 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities, I verify that:

1. The above are the precise last-known addresses of the judgment debtor and creditor.
2. The annexed notice of intention to file this praecipec was mailed to all parties against whom judgment is to be entered and to their record attorneys, if any, after the default occurred, and at least ten days prior to the date of the filing of this praecipec.
3. Pursuant to Section 201(b)(1)(A) of the Servicemembers Civil Relief Act of 2003 (SCRA), the defendant is not in the military service of the United States based on information received from the defendant and/or the Department of Defense website.

**JUDGMENT BY DEFAULT ENTERED
AND DAMAGES ASSESSED AS ABOVE.
NOTICE GIVEN UNDER PA.R.CIV.P. 236**

Pro Prothonotary

BURTON NEIL & ASSOCIATES, P.C.

BY: 

Burton Neil, Esquire
Attorney for Plaintiff
I.D. #11348
1060 Andrew Drive, Suite 170
W. Chester, PA 19380

The law firm of Burton Neil & Associates is a debt collector.

7.6980

CITIBANK (SOUTH DAKOTA) N.A.
Plaintiff

VS.

JEFFREY L REISH

Defendant

: IN THE COURT OF COMMON PLEAS
: CLEARFIELD COUNTY, PENNSYLVANIA
: NO. 04-1008-CD
: CIVIL ACTION - LAW

Notice of Intention to File Praecipe for Default Judgment

TO: JEFFREY L REISH
804 MOWERY RIDGE ROAD
FRENCHVILLE, PA 16836

DATE OF NOTICE: August 18, 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 obligations to the claims set forth against you. Unless you act within ten (10) 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 or cannot afford one, go to or telephone the following office 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 Referral Service

Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
814-765-2641

BURTON NEIL & ASSOCIATES, P.C.

BY: 

Burton Neil, Esquire
Attorney for Plaintiff
Identification No. 11348
1060 Andrew Drive, Suite 170
West Chester, PA 19380
(610) 696-2120

In making this communication, we advise that this office is a debt collector.

BURTON NEIL & ASSOCIATES, P.C.

By: Burton Neil, Esquire

Identification No. 11348

1060 Andrew Drive, Suite 170

West Chester, PA 19380

610-696-2120

Attorney for Plaintiff

CITIBANK (SOUTH DAKOTA) N.A.

701 EAST 60th STREET NORTH

SIOUX FALLS, SD 57117

: IN THE COURT OF COMMON PLEAS

: CLEARFIELD COUNTY, PENNSYLVANIA

Plaintiff

VS.

: NO. 04-1008-CD

JEFFREY L REISH

804 MOWERY RIDGE ROAD

FRENCHVILLE, PA 16836

Defendant

: CIVIL ACTION - LAW

RULE OF CIVIL PROCEDURE NO. 236 (REVISED)

Notice is given that a JUDGMENT in the above captioned matter has been entered against
you on _____.

Prothonotary

By: _____
Deputy

If you have any questions concerning the above, please contact:

Burton Neil, Esquire
Attorney for Party Filing
1060 Andrew Drive, Suite 170
West Chester, PA 19380
Phone: 610-696-2120

In making this communication, we advise that our firm is a debt collector.

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

Citibank (South Dakota) N.A.
Plaintiff(s)

No.: 2004-01008-CD

Real Debt: \$2,111.50

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Jeffrey L. Reish
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: September 27, 2004

Expires: September 27, 2009

Certified from the record this 27th day of September, 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

BURTON NEIL & ASSOCIATES, P.C.
By Burton Neil, Esquire
Identification No. 11348
1060 Andrew Drive, Suite 170
West Chester, PA 19380
610-696-2120
Attorney for Plaintiff

CITIBANK SOUTH DAKOTA N.A.

Plaintiff

VS.

JEFFREY L REISH

Defendant

: IN THE COURT OF COMMON PLEAS

: CLEARFIELD COUNTY, PENNSYLVANIA

: NO. 04-1008-CD

: CIVIL ACTION - LAW

PRAECIPE TO SATISFY JUDGMENT

TO THE PROTHONOTARY:

Mark the judgment **Satisfied** on payment of your costs only.

BURTON NEIL & ASSOCIATES, P.C.

By: 

Burton Neil, Esquire
Attorney for Plaintiff

The law firm of Burton Neil & Associates is a debt collector.

T-1709

FILED

JUL 24 2006

W/1155/W

William A. Shaw
Prothonotary/Clerk of Courts

1 CENT TO

ATTY



FILED
JUL 24 2006
William A. Shaw
Prothonotary/Clerk of Courts