

04-1010-CD  
CITIBANK

VS

RICKY A PAPE

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

VS.

RICKY A PAPE  
1628 Treasure Lake  
Du Bois, PA 15801-9044  
Defendant

: IN THE COURT OF COMMON PLEAS

: CLEARFIELD COUNTY, PENNSYLVANIA

: NO. 04-1010-CD

: CIVIL ACTION - LAW

**FILED**  
M 200 11A AL 2004  
Notice by Def  
SEP 24 2004

**Praecipe for Default Judgment**

William J. 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:	\$18,763.63
Credit:	-0.00
<b>TOTAL</b>	<b>\$18,763.63</b>

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 praecipe 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 praecipe.
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 P.A.R.CIV.P. 236**

BURTON NEIL & ASSOCIATES, P.C.

BY: 

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

\_\_\_\_\_  
Pro Prothonotary

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

7.6051

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

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

No.: 2004-01010-CD

Real Debt: \$18,763.63

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Ricky A. Pape  
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: September 24, 2004

Expires: September 24, 2009

Certified from the record this 24th 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

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

Plaintiff

: IN THE COURT OF COMMON PLEAS

: CLEARFIELD COUNTY, PENNSYLVANIA

v.

RICKY A PAPE

1628 TREASURE LAKE

DU BOIS, PA

Defendant

: NO. 04-1010-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

10007.034.6051

**FILED**

**JUL 01 2004**

William A. Shaw  
Prothonotary/Clerk of Courts

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

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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.

RICKY A PAPE

1628 TREASURE LAKE

DU BOIS, 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 RICKY A PAPE, who resides at 1628 TREASURE LAKE DU BOIS, 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 5424180493415647 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 \$18763.63

Wherefore, plaintiff demands judgment against the defendant for the sum of \$18763.63 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.

09/11/03 \$18764.90 \$9999.99  
 PAY DATE NEW BALANCE MIN AMT DUE

SITE:KC-CL TM:CO-5000 ACID:KCB3074  
 01/28/04 20:14:14:

RICKY A PAPE  
 1628 TREASURE LAKE  
 DU BOIS  
 15801-9044000

PA

P.O. BOX 8111  
 S HACKENSACK, NJ  
 07606-8111

## Citi® Platinum Select® Card

Account Number  
 5424 1804 9341 5647

Payment must be received by 1:00 pm local time on 09/11/2003

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

BOX 6500  
 SIOUX FALLS, SD  
 57117

Statement/Closing Date	Total Credit Line	Available Credit Line	Cash Advance Limit	Available Cash Limit	New Balance
08/18/2003	\$16100	\$0	\$6600	\$0	\$18764.90
		Amount Over Credit Line	Past Due	Purch/Adv Minimum Due	Minimum Amount Due
		\$2664.90	\$2652.83	\$458.97	\$18764.90

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
	8/18		<b>Standard Purch</b> OVER CREDIT LIMIT FEE	29.00
	8/18		62 0000 PURCHASES*FINANCE CHARGE*PERIODIC RATE	0000000000 391.51
	8/18		84 0000 <b>Standard Adv</b> ADVANCES*FINANCE CHARGE*PERIODIC RATE	0000000000 62.46
			84 0000	0000000000

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	\$15,766.49	\$29.00	\$0.00	\$391.51	\$16,187.00
ADVANCES	\$2,515.44	\$0.00	\$0.00	\$62.46	\$2,577.90
TOTAL	\$18,281.93	\$29.00	\$0.00	\$453.97	\$18,764.90

Days This Billing Period: 32

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$15,955.33	0.07668%(D)	27.990%	27.990%
ADVANCES				
Standard Adv	\$2,545.57	0.07668%(D)	27.990%	27.990%

SEND PAYMENTS TO:

1749

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 Simon  
Name

Account number: 5424180493415647  
Defendant: RICKY A PAPE

FILED

M/4:00 PM  
DEC 1 2004

100

Sheriff

Ady ad 85.00

William A. Shaw  
Notary Public/Clerk of Courts

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

CITIBANK

VS.

PAPE, RICKY A.

COMPLAINT

Sheriff Docket #

15916

04-1010-CD

**SHERIFF RETURNS**

NOW JULY 28, 2004 AT 9:48 PM SERVED THE WITHIN COMPLAINT ON RICKY A. PAPE, DEFENDANT AT RESIDENCE, 1628 TREASURE LAKE, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO JO ELLEN PAPE, WIFE A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN TO HER THE CONTENTS THEREOF. SERVED BY: NEVLING

**Return Costs**

Cost	Description
89.62	SHERIFF HAWKINS PAID BY: <i>Att</i>
10.00	SURCHARGE PAID BY: ATTY CK# 19867

Sworn to Before Me This

*24th* Day Of *August* 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 Maury Hamr*  
Chester A. Hawkins  
Sheriff

**FILED**

*019:11661 cc*  
AUG 24 2004  
*EJB*

William A. Shaw  
Prothonotary/Clerk of Courts

**FILED**

**AUG 24 2004**

William A. Shaw  
Prothonotary/Clerk of Courts