

2004-1348-CD  
DISCOVER BANK

VS

JONATHAN LYNN FRANCHOCK

Discover Bank vs Jonathan Franchok  
2004-1348-CD

Our File No. 181167  
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

JONATHAN LYNN FRANCHOCK  
RR2 BOX 343  
MORRISDALE, PA 16858 9107

No. 04-1348-05

#### 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

AUG 30 2004

William A. Shaw  
Prothonotary/Clerk of Courts

Oûr File No. 181167  
ATTORNEYS FOR PLAINTIFF  
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King of Prussia, PA 19406  
vs.  
JONATHAN LYNN FRANCHOCK  
RR2 BOX 343  
MORRISDALE, PA 16858 9107  
-----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), JONATHAN LYNN FRANCHOCK ,  
resides at RR2 BOX 343 , MORRISDALE, PA 16858-9107.

3. There is due from the Defendant(s) the sum of \$6,977.65 for  
credit extended by Plaintiff to Defendant(s), acct. no. 6011002660278623,  
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 \$6,977.65 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.

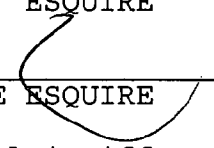
5. All applicable credits, if any, have been duly applied to  
Defendant(s) credit account.

WHEREFORE, Plaintiff claims of the Defendant(s) the sum of \$6,977.65  
plus interest, attorneys fees and costs which are justly due and  
owing from the Defendant(s) to the Plaintiff.

Dated: JULY 30, 2004

ERIC M. BERMAN, P.C.

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: JULY 30, 2004

SPACEBNW-ZN

FILED 2cc Sheriff  
M 9:54 AM  
AUG 30 2004 Aug pd 85.00

William A. Shaw  
Prothonotary/Clerk of Courts

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

DISCOVER BANK

VS.

FRANCHOCK, JONATHAN LYNN

COMPLAINT

Sheriff Docket #

16210

04-1348-CD

**SHERIFF RETURNS**

NOW OCTOBER 1, 2004 AT 10:35 AM SERVED THE WITHIN COMPLAINT ON JONATHAN LYNN FRANCHOCK, DEFENDANT AT SHERIFF'S OFFICE, 1 N. 2ND ST., SUITE 116, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO JONATHAN LYNN FRANCHOCK A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN TO HIM THE CONTENTS THEREOF.  
SERVED BY: HAWKINS

**Return Costs**

Cost	Description
49.75	SHERIFF HAWKINS PAID BY: ATTY CK# 19957
10.00	SURCHARGE PAID BY: ATTY CK# 19956

Sworn to Before Me This

21 Day Of October 2004  
*William A. Shaw*

So Answers,

*Chester A. Hawkins*  
*by Maury Hamr*  
Chester A. Hawkins  
Sheriff

**FILED** EGK

OCT 21 2004

William A. Shaw  
Prothonotary

Our File No. 181167  
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

COPY

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

vs.

TRIAL DIVISION

CIVIL ACTION

Term

JONATHAN LYNN FRANCHOCK

RR2 BOX 343

MORRISDALE, PA 16858 9107

No. 04-1348-C

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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.

AUG 30 2004

Attest

*William D. Shaw*  
Prothonotary/  
Clerk of Courts

Our File No. 181167  
ATTORNEYS FOR PLAINTIFF  
ERIC M. BERMAN, P.C.

BY: Eric M. Berman, Esquire, I.D. 83698  
BY: Robert M. Kline, Esquire, I.D. 56479  
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owing from the Defendant(s) to the Plaintiff.

Dated: JULY 30, 2004

ERIC M. BERMAN, P.C.

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.

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ERIC M. BERMAN, ESQUIRE



ROBERT M. KLINE, ESQUIRE

Dated: JULY 30, 2004

SPACEBNW-ZN

Our File No. 181167  
ERIC M. BERMAN, P.C.  
By: Robert M. Kline, Esquire  
Identification No. 56479  
500 N. Gulph Road, Suite 350  
King of Prussia, PA 19406  
(484)690-3900  
Attorneys for Plaintiff

---

DISCOVER BANK  
c/o Eric M. Berman, P.C.  
500 N. Gulph Road, Suite 350  
King of Prussia, PA 19406

: COURT OF COMMON PLEAS  
: CLEARFIELD COUNTY

:  
: CIVIL ACTION

VS.

: CASE NO. 2004-01348

JONATHAN LYNN FRANCHOCK

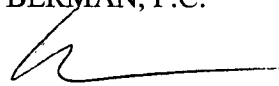
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**PRAECIPE TO DISCONTINUE WITHOUT PREJUDICE**

TO THE PROTHONOTARY:

Kindly discontinue the above action without prejudice.

ERIC M. BERMAN, P.C.



By: Robert M. Kline, Esquire  
Attorneys for Plaintiff

Dated: March 19, 2010

3  
FILED No CC  
MAR 24 2010  
William A. Shaw  
Prothonotary/Clerk of Courts