

Discover Bank vs Jonathan Franchok
2004-1348-CD

2004-1348-CD
DISCOVER BANK

VS

JONATHAN LYNN FRANCHOK

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. : TRIAL DIVISION
198 Allendale Road, Suite 306 :
King of Prussia, PA 19406 : CIVIL ACTION
vs. : : Term

JONATHAN LYNN FRANCHOCK
RR2 BOX 343
MORRISDALE, PA 16858 9107

No. 04-1348-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

AUG 30 2004

William A. 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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King of Prussia, PA 19406
(610) 265-7720

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

DISCOVER BANK
c/o ERIC M. BERMAN, P.C. : CIVIL ACTION
198 Allendale Road, Suite 306 : _____ Term _____
King of Prussia, PA 19406 :
: No.

vs.

JONATHAN LYNN FRANCHOCK

RR2 BOX 343

MORRISDALE, PA 16858 9107

MORRISDALE, IA 18858 9107

-----x-----

COMPLAINT

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.

ERIC M. BERMAN, P.C.

Dated: JULY 30, 2004

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 *cc Sheriff*
MJO: 54169 Aug 30 2004
AUG 30 2004
AUG 30 2004

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 Hawkins
by Marilyn Harris

Chester A. Hawkins
Sheriff

FILED
EGL

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
X 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

X 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 L. Brown
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
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. : CIVIL ACTION
198 Allendale Road, Suite 306 : _____ Term _____
King of Prussia, PA 19406 : No.

JONATHAN LYNN FRANCHOCK
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Dated: JULY 30, 2004

ERIC M. BERMAN, P.C.

BY: Lyn
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.

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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

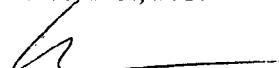
DISCOVER BANK : COURT OF COMMON PLEAS
c/o Eric M. Berman, P.C. : CLEARFIELD COUNTY
500 N. Gulph Road, Suite 350 :
King of Prussia, PA 19406 :
: CIVIL ACTION
: :
vs. : CASE NO. 2004-01348
JONATHAN LYNN FRANCHOCK :
:

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

S
FILED
M 11:05 AM
MAR 24 2010
No cc
William A. Shaw
Prothonotary/Clerk of Courts
WAS