

04-1509-CD
DISCOVER BANK vs. WILLIAM N. YEATMAN

Discover Bank vs William Yeatman et al
2004-1509-CD

Our File No. 190663
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
2004-1509-C0

WILLIAM N YEATMAN
MARY A YEATMAN
411 S CHURCH ST
DU BOIS, PA 15801 1911

No.

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 *fm*

SEP 29 2004
2004-1509-C0
William A Shaw

Prothonotary/Clerk of Courts

1 CERT TO ATT

2 CERT TO SHAW

Our File No. 190663
ATTORNEYS FOR PLAINTIFF
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-----X-----
COURT OF COMMON PLEAS
COUNTY OF CLEARFIELD
DISCOVER BANK : CIVIL ACTION
c/o ERIC M. BERMAN, P.C. : _____ Term _____
198 Allendale Road, Suite 306 :
King of Prussia, PA 19406 :
vs. :
: No.
: :
WILLIAM N YEATMAN
MARY A YEATMAN
411 S CHURCH ST
DU BOIS, PA 15801 1911
-----X-----

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), WILLIAM N YEATMAN MARY A YEATMAN ,
resides at 411 S CHURCH ST , DU BOIS, PA 15801-1911.

3. There is due from the Defendant(s) the sum of \$9,487.87 for
credit extended by Plaintiff to Defendant(s), acct. no. 6011002090311333,
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 \$9,487.87 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 \$9,487.87
plus interest, attorneys fees and costs which are justly due and
owing from the Defendant(s) to the Plaintiff.

Dated: SEPTEMBER 17, 2004

ERIC M. BERMAN, P.C.

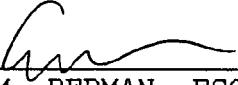
BY: 
ERIC M. BERMAN, ESQUIRE

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: SEPTEMBER 17, 2004

SPACEBNW-ZN

FILED

SEP 29 2004

William A. Snell
Prothonotary Clerk of the Court

In The Court of Common Pleas of Clearfield County, Pennsylvania

DISCOVER BANK

VS.

YEATMAN, WILLIAM N. & MARY A.

COMPLAINT

Sheriff Docket # 16363

04-1509-CD

SHERIFF RETURNS

NOW NOVEMBER 16, 2004 RETURN THE WITHIN COMPLAINT "NOT SERVED, TIME EXPIRED" AS TO WILLIAM N. YEATMAN and MARY A. YEATMAN, DEFENDANTS. DID NOT RECEIVED SURCHARGE FROM ATTORNEY IN TIME TO ATTEMPT SERVICE.

Return Costs

Cost	Description
19.37	SHERIFF HAWKINS PAID BY: ATTY CK# 20450
20.00	SURCHARGE PAID BY: ATTY CK# 204511935

Sworn to Before Me This

16th Day Of Nov 2004
W. A. Shaw

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

So Answers,

Chester Hawkins
by *Marilyn Haskin*
Chester A. Hawkins
Sheriff

FILED *ew*
01/12/5381
NOV 16 2004

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

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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

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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.

SEP 29 2004

Attest.

W. Michael
Prothonotary
Clerk of Courts

Our File No. 190663
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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-----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 :
VS. : No.

WILLIAM N YEATMAN
MARY A YEATMAN
411 S CHURCH ST
DU BOIS, PA 15801 1911

COMPLAINT

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4. The Plaintiff has made demand upon the Defendant(s) for payment of monies in the sum of \$9,487.87 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 \$9,487.87 plus interest, attorneys fees and costs which are justly due and owing from the Defendant(s) to the Plaintiff.

Dated: SEPTEMBER 17, 2004

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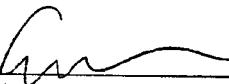
BY: Eric M. Breman, Esquire

BY: ROBERT M. KLINE, ESQUIRE

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ERIC M. BERMAN, ESQUIRE



ROBERT M. KLINE, ESQUIRE

Dated: SEPTEMBER 17, 2004

SPACEBNW-ZN

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: TRIAL DIVISION

: CIVIL ACTION

vs.

: Term _____

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2004-1509-cv

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Prothonotary/
Clerk of Courts

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ERIC M. BERMAN, ESQUIRE

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SPACEBNW-ZN