

04-1510-CD  
DISCOVER BANK vs KELLY MICHAEL REIFER

Discover vs Kelly Reifer  
2004-1510-CD

Our File No. 188937  
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

DISCOVER BANK

c/o ERIC M. BERMAN, P.C.  
198 Allendale Road, Suite 306  
King of Prussia, PA 19406

vs.

KELLY MICHAEL REIFER  
263 BIRCH ST  
HOUTZDALE, PA 16651 9024

COURT OF COMMON PLEAS  
COUNTY OF CLEARFIELD

TRIAL DIVISION

CIVIL ACTION

Term

2004- 1510-CV

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

SEP 29 2004  
PM 11:35 AM  
William A. Shaw  
Prothonotary/Clerk of Courts

1 cent to SHFC  
1 cent to ARA

Our File No. 188937  
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  
DISCOVER BANK : COURT OF COMMON PLEAS  
c/o ERIC M. BERMAN, P.C. : COUNTY OF CLEARFIELD  
198 Allendale Road, Suite 306 : CIVIL ACTION  
King of Prussia, PA 19406 : Term \_\_\_\_\_  
vs. : No.  
: \_\_\_\_\_  
KELLY MICHAEL REIFER  
263 BIRCH ST  
HOUTZDALE, PA 16651 9024

-----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), KELLY MICHAEL REIFER ,  
resides at 263 BIRCH ST , HOUTZDALE, PA 16651-9024.

3. There is due from the Defendant(s) the sum of \$9,234.97 for  
credit extended by Plaintiff to Defendant(s), acct. no. 6011003860075751,  
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 \$9,234.97 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.

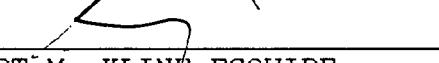
5. All applicable credits, if any, have been duly applied to  
Defendant(s) credit account.

WHEREFORE, Plaintiff claims of the Defendant(s) the sum of \$9,234.97  
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: SEPTEMBER 17, 2004

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

FILED

SEP 29 2004

William A. Stratton  
Prothonotary/Clerk of Court

In The Court of Common Pleas of Clearfield County, Pennsylvania

DISCOVER BANK

VS.

REIFER, KELLY MICHAEL

COMPLAINT

Sheriff Docket # 16364

04-1510-CD

**SHERIFF RETURNS**

---

NOW OCTOBER 5, 2004 AT 3:38 PM SERVED THE WITHIN COMPLAINT ON KELLY MICHAEL REIFER, DEFENDANT AT SHERIFF'S OFFICE, 1 N. 2ND ST., SUITE 116, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO KELLY MICHAEL REIFER A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN TO HIM THE CONTENTS THEREOF.

SERVED BY: SNYDER

---

**Return Costs**

Cost	Description
46.00	SHERIFF HAWKINS PAID BY: ATTY CK# 20447
10.00	SURCHARGE PAID BY: ATTY CK# 20448

---

**Sworn to Before Me This**

1<sup>st</sup> Day Of November 2004

William A. Shaw

Prothonotary

My Commission Expires

1st Monday in Jan. 2006

Clearfield Co., Clearfield, PA

**So Answers,**

Chester Hawkins  
*by Marilyn Hause*

Chester A. Hawkins

Sheriff

**FILED**

*10/3/2004*  
NOV 01 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

198 Allendale Road, Suite 306

King of Prussia, PA 19406

(610) 265-7720

OP

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

KELLY MICHAEL REIFER

263 BIRCH ST

HOUTZDALE, PA 16651 9024

2004-1510-C

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

I hereby certify this to be a true and attested copy of the original statement filed in this case.

SEP 29 2004

Attest.

*W. L. R.*  
Prothonotary/  
Clerk of Courts

Our File No. 188937  
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  
DISCOVER BANK : COURT OF COMMON PLEAS  
c/o ERIC M. BERMAN, P.C. : COUNTY OF CLEARFIELD  
198 Allendale Road, Suite 306 : CIVIL ACTION  
King of Prussia, PA 19406 : \_\_\_\_\_ Term \_\_\_\_\_  
VS. : No.

KELLY MICHAEL REIFER  
263 BIRCH ST  
HOUTZDALE, PA 16651 9024

**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), KELLY MICHAEL REIFER  
resides at 263 BIRCH ST., HOUTZDALE, PA 16651-9024.

3. There is due from the Defendant(s) the sum of \$9,234.97 for credit extended by Plaintiff to Defendant(s), acct. no. 6011003860075751, 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 \$9,234.97 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 \$9,234.97 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: SEPTEMBER 17, 2004

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: SEPTEMBER 17, 2004

SPACEBNW-ZN