

04-1672-CD
CITIBANK (COURTH DAKOTA) N.A. vs. BLANCHE DICK

Citibank vs Blanche Dick
2004-1672-CD

BURTON NEIL & ASSOCIATES, P.C.
By: Burton Neil, Esquire
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

v.

BLANCHE DICK
114 Jackson Street, Coalport PA 16627-9246
Defendant

: IN THE COURT OF COMMON PLEAS
: CLEARFIELD COUNTY, PENNSYLVANIA

: NO. 04-1672-C0
: 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 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 AND
INFORMATION SERVICE
David S. Meholic
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
Telephone No. 814-765-2641 Ext. 5982

FILED
M 2:27 PM Oct 25 2004
100 to 4th fl
OCT 25 2004

C-3187

William A. Shaw
Prothonotary

BURTON NEIL & ASSOCIATES, P.C.
By: Burton Neil, Esquire
Identification No. 11348
1060 Andrew Drive, Suite 170
West Chester, PA 19380
610-696-2120
Attorney for Plaintiff

CITIBANK (SOUTH DAKOTA) N.A. : IN THE COURT OF COMMON PLEAS
701 East 60th Street North, Sioux Falls, SD
Plaintiff : CLEARFIELD COUNTY, PENNSYLVANIA
v. : NO.
BLANCHE DICK : CIVIL ACTION - LAW
114 Jackson Street, Coalport, PA
Defendant

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 Blanche Dick, who resides at 114 Jackson Street, Coalport, 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 account number 4417033011199767 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 period.
7. Defendant received the monthly statements from plaintiff for the credit card account including the statement attached hereto as Exhibit A statement without protest, dispute or objection.
8. Defendant is 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 \$11,216.56.

Wherefore, plaintiff demands judgment against defendant for the sum of \$11,216.56, and the costs of this action.

BURTON NEIL & ASSOCIATES, P.C.

(By: 

Burton Neil, Esquire
Attorney for Plaintiff

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

08/10/04 \$11216.56 \$9999.99 SITE:KC-CL TM:CO-5000 ACID:KCB7150
 PM: DUE DATE NEW BALANCE MIN AMT DUE 08/10/04 17:54:21:

BLANCHE DICK
 114 JACKSON ST
 COALPORT
 16627-9246000

PA

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

Citi® Card



Account Number
 4417 0330 1119 9767

Customer Service:

1-800-983-6453	Total Credit Line \$8900	Available Credit Line \$0	Cash Advance Limit \$8900	Available Cash Limit \$0	New Balance \$11216.56
Po Box 44167 Jacksonville, FL 32231-4167	Statement/ Closing Date 07/16/2004	Amount Over Credit Line \$2316.56	Past Due \$1636.81	Purch/Adv Minimum Due \$270.56	Minimum Amount Due \$11216.56

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
	7/16		Standard Purch OVER CREDIT LIMIT FEE 62 0000 0 PURCHASES*FINANCE CHARGE*PERIODIC RATE 84 0000 0	29.00 70000000000 83.66 70000000000
	7/16		Rate Sale - Charged To Offer 4 ADVANCES*FINANCE CHARGE*PERIODIC RATE 84 0000 0	181.90 70000000000
	7/16			

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	\$3,440.98	\$29.00	\$0.00	\$83.66	\$3,553.64
ADVANCES	\$7,481.02	\$0.00	\$0.00	\$181.90	\$7,662.92
TOTAL	\$10,922.00	\$29.00	\$0.00	\$265.56	\$11,216.56

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE	Days This Billing Period: 30
PURCHASES					
Standard Purch	\$3,481.25	0.08011%(D)	29.240%	29.240%	
ADVANCES	\$0.00	0.08011%(D)	29.240%	29.240%	
Standard Adv	\$7,568.57	0.08011%(D)	29.240%	29.240%	
Offer 4					

EXHIBIT 

VERIFICATION

SUSAN CAREY is Attorney Management Specialist for Citibank (South Dakota) N.A. the within Plaintiff in this action, and that the statements of fact made in the foregoing Complaint are true and correct to the best of the undersigned verifier's 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: _____

A handwritten signature in black ink that reads "Susan Carey". The signature is fluid and cursive, with "Susan" on the top line and "Carey" on the bottom line, with a small "✓" preceding "Susan".

Blanche Dick
4417033011199767

In The Court of Common Pleas of Clearfield County, Pennsylvania

CITIBANK (SOUTH DAKOTA) NA

VS.

DICK, BLANCHE

COMPLAINT

Sheriff Docket # 16533

04-1672-CD

SHERIFF RETURNS

NOW NOVEMBER 2, 2004 AT 10:00 AM SERVED THE WITHIN COMPLAINT ON BLANCHE DICK, DEFENDANT AT RESIDENCE, 114 JACKSON ST., COALPORT, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO BLANCHE DICK A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN TO HER THE CONTENTS THEREOF.

SERVED BY: DAVIS/MORGILLO

Return Costs

Cost	Description
81.00	SHERIFF HAWKINS PAID BY: <i>Cut</i>
10.00	SURCHARGE PAID BY: ATTY CK# 3535

Sworn to Before Me This

41st Day Of December 2004

1-11-04
WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

So Answers,

Chester A. Hawkins
My Manly Hand
Chester A. Hawkins
Sheriff

FILED

01/14/2004
DEC 14 2004

William A. Shaw
Prothonotary/Clerk of Courts

CITIBANK (SOUTH DAKOTA) N.A.
701 East 60th Street N, Sioux Falls, SD 57117
Plaintiff

VS.

BLANCHE DICK
114 Jackson Street
Coalport PA 16627-9246

Defendant

: IN THE COURT OF COMMON PLEAS

: CLEARFIELD COUNTY, PENNSYLVANIA

: NO. 04-1672-CD

: CIVIL ACTION - LAW

Praeclipe for Default Judgment

FILED

*m 1/13 BA 04-1672-CD
Notice to Day sent to attorney
DEC 27 2004*

**William A. 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:	\$11,216.56
	\$0.00
TOTAL	\$11,216.56

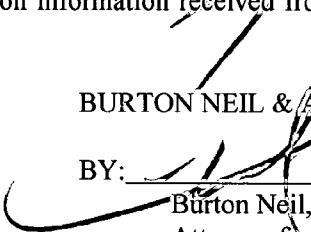
Understanding that false statements herein made are subject to penalty under 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities, I verify that:

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 PA.R.CIV.P. 236**

Pro Prothonotary

BURTON NEIL & ASSOCIATES, P.C.

BY: 

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

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

C-3187

CITIBANK (SOUTH DAKOTA) N.A.

: IN THE COURT OF COMMON PLEAS

Plaintiff
vs.

: CLEARFIELD COUNTY, PENNSYLVANIA
: NO. 04-1672-CD

BLANCHE DICK

Defendant

: CIVIL ACTION - LAW

Notice of Intention to File Praeclipe for Default Judgment

TO: Blanche Dick
114 Jackson Street
Coalport PA 16627-9246

Jerome S. Lamet, Esquire
542 S. Dearborn St., Ste 1260
Chicago, IL 60605

DATE OF NOTICE: December 6, 2004

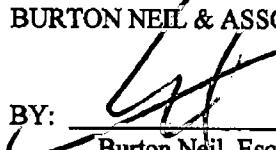
IMPORTANT NOTICE

You are in default because you have failed to enter a written appearance personally or by attorney and file in writing with the court your defenses or obligations to the claims set forth against you. Unless you act within ten (10) days from the date of this notice, a judgment may be entered against you without a hearing and you may lose your property or other important rights. You should take this notice to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the following office 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 AND
INFORMATION SERVICE
David S. Meholic
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
Telephone No. 814-765-2641 Ext. 5982

BURTON NEIL & ASSOCIATES, P.C.

BY: 

Burton Neil, Esquire
Attorney for Plaintiff
Identification No. 11348
1060 Andrew Drive, Suite 170
West Chester, PA 19380
610-696-2120

The firm of Burton Neil & Associates, P.C. is attempting to collect a debt.

C-3187

BURTON NEIL & ASSOCIATES, P.C.
BY: Burton Neil, Esquire
Identification No. 11348
1060 Andrew Drive, Suite 170
West Chester, PA 19380
610-696-2120
ATTORNEY FOR: Plaintiff

CITIBANK (SOUTH DAKOTA) N.A. : IN THE COURT OF COMMON PLEAS
Plaintiff : CLEARFIELD COUNTY, PENNSYLVANIA
VS. : NO. 04-1672-CD
BLANCHE DICK : CIVIL ACTION - LAW
Defendant

RULE OF CIVIL PROCEDURE NO. 236 (REVISED)

Notice is given that a JUDGMENT in the above captioned matter has been entered against you on

Prothonotary

By: _____
Deputy

If you have any questions concerning the above, please contact:

Burton Neil, Esquire
Attorney for Party Filing
1060 Andrew Drive, Suite 170
West Chester, PA 19380
Phone: 610-696-2120

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

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

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

No.: 2004-01672-CD

Real Debt: \$11,216.56

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Blanche Dick
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: December 27, 2004

Expires: December 27, 2009

Certified from the record this 27th day of December, 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