

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

ASSETS ADVANTAGE, INC., ASSIGNEE OF
FLEET BANK

Plaintiff

No. 04-1772-C

vs.

COMPLAINT IN CIVIL ACTION

JON D GOULD

Defendant

FILED ON BEHALF OF
Plaintiff

COUNSEL OF RECORD OF
THIS PARTY:

James C. Warmbrodt
PA I.D #42524
WELTMAN, WEINBERG & REIS CO., L.P.A.
2718 Koppers Building
436 Seventh Avenue
Pittsburgh, PA 15219
(412) 434-7955

WWR#03704521

FILED 100 shff
M/2.28/04 Atty pd.
NOV 08 2004 85.00

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

ASSETS ADVANTAGE, INC., ASSIGNEE OF
FLEET BANK

Plaintiff

vs.

Civil Action No.

JON D GOULD

Defendant

COMPLAINT IN CIVIL ACTION AND 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 an 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 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

CLEARFIELD COUNTY
SOURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
230 EAST MARKET ST., SUITE 228
CLEARFIELD, PA 16830
(841) 765-2641, EXT 1300-1301

COMPLAINT

1. Plaintiff is a corporation with offices in Houston, TX 77074.
2. Defendant is residing at 408 Karr Sr., Du Boise, PA 15801.
3. Defendant applied for and received a credit card issued by Plaintiff bearing the account number 5420969107092998.
4. Defendant made use of said credit card and has currently a balance due and owing to Plaintiff, as of October 18, 2004, in the amount of \$ 6,356.63 .
5. Defendant is in default of the terms of the cardholder Agreement having not made monthly payments to Plaintiff thereby rendering the entire balance immediately due and payable.
6. Plaintiff avers that the Cardholder Agreement between the parties provides that Plaintiff is entitled to the addition of finance charges at the rate of 6.00% per annum on the unpaid balance.
7. Although repeatedly requested to do so by Plaintiff, Defendant has willfully failed and/or refused to pay the principal balance, finance charges or any part thereof to Plaintiff.

WHEREFORE, Plaintiff demands Judgment in its favor and against Defendant, Jon D. Gould individually, in the amount of \$ 6,356.63 with continuing finance charges thereon at the rate of 6.00% per annum from October 18, 2004 plus costs.

THIS IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION OBTAINED SHALL BE USED FOR THAT PURPOSE.

WELTMAN, WEINBERG & REIS, CO., L.P.A.

James C. Warmbrodt

PA I.D #42524

WELTMAN, WEINBERG & REIS CO., L.P.A.

2718 Koppers Building

436 Seventh Avenue

Pittsburgh, PA 15219

(412) 434-7955

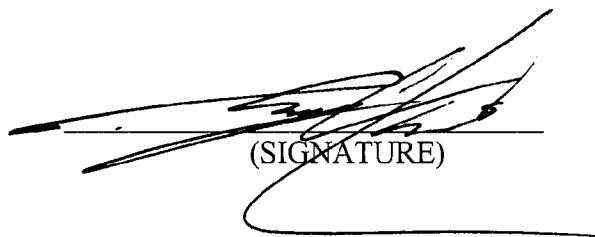
WWR#:03704521

VERIFICATION

The undersigned does hereby verify subject to the penalties of 18 PA. C.S. 4904 relating to unsworn falsifications to authorities, that he/she is Steven J. Vutci
(NAME)

Director of Operations of LTD Financial Services, plaintiff herein, that
(TITLE) (COMPANY)

he/she is duly authorized to make this verification, and that the facts set forth in the foregoing Complaint are true and correct to the best of his/her knowledge, information and belief.



(SIGNATURE)

WWR# 03704521
ACCOUNT # 5420969107092998

John D. Gruel

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

ASSETS ADVANTAGE, INC., ASSIGNEE OF
FLEET BANK,

Plaintiff No. 04-1772-CD

vs. PRAECIPE TO SETTLE, DISCONTINUE
& END

JON D. GOULD,

Defendant

FILED ON BEHALF OF
Plaintiff

COUNSEL OF RECORD OF
THIS PARTY:

Benjamin R. Bibler, Esquire
PA I.D. #93598
WELTMAN, WEINBERG & REIS CO., L.P.A.
2718 Koppers Building
436 Seventh Avenue
Pittsburgh, PA 15219
(412) 434-7955

WWR#03704521

FILED *RE*

DEC 09 2004
m/3:30 p
William A. Shaw
Prothonotary/Clerk of Courts
CERTIFIED TO ATTOR

*+
c/b*

IN THE COURT OF COMMON PLEAS CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

ASSETS ADVANTAGE, INC., ASSIGNEE OF
FLEET BANK,

Plaintiff

vs.

Civil Action No. 04-1772-CD

JON D. GOULD,

Defendant

PRAECIPE TO SETTLE DISCONTINUE AND END

TO THE PROTHONOTARY OF COUNTY:

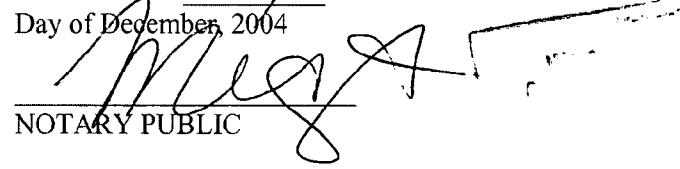
**Please kindly Settle Discontinue and End the above captioned matter upon the records of the Court and
mark the cost paid.**

WELTMAN, WEINBERG & REIS CO., L.P.A.

By: 
Benjamin R. Bibler, Esquire
PA I.D. #93598

WELTMAN, WEINBERG & REIS CO., L.P.A.
2718 Koppers Building
436 Seventh Avenue
Pittsburgh, PA 15219
(412) 434-7955
WWR#03704521

Sworn to and subscribed
Before me the _____
Day of December, 2004


NOTARY PUBLIC

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

CIVIL DIVISION

**Assets Advantage, Inc.
Fleet Bank**

Vs. **No. 2004-01772-CD**
Jon D. Gould

CERTIFICATE OF DISCONTINUATION

Commonwealth of PA
County of Clearfield

I, William A. Shaw, Prothonotary of the Court of Common Pleas in and for the County and Commonwealth aforesaid do hereby certify that the above case was on December 9, 2004, marked:

Settle, Discontinue and End

Record costs in the sum of \$85.00 have been paid in full by Weltman Weinberg & Reis .

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 9th day of December A.D. 2004.

William A. Shaw, Prothonotary

In The Court of Common Pleas of Clearfield County, Pennsylvania

ASSETS ADVANTAGE, INC.

VS.

GOULD, JON D.

COMPLAINT

Sheriff Docket # 16587

04-1772-CD

SHERIFF RETURNS

NOW NOVEMBER 12, 2004 AT 11:00 AM SERVED THE WITHIN COMPLAINT ON JON D. GOULD, DEFENDANT AT RESIDENCE, 408 KNARR ST, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO JON D. GOULD A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN TO HIM THE CONTENTS THEREOF.

SERVED BY: COUDRIET

Return Costs

Cost	Description
32.25	SHERIFF HAWKINS PAID BY: ATTY CK# 8167377
10.00	SURCHARGE PAID BY: ATTY CK# 8167378

Sworn to Before Me This

16 Day Of Dec 2004

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

So Answers,

Chester A. Hawkins
by Marilyn H. Hays
Chester A. Hawkins
Sheriff

FILED

864
DEC 16 2004
072-01
William A. Shaw
Prothonotary/Clerk of Courts