

2004-1927-CD
Citibank vs Scott Kerfoot

04-1927-CD
CITIBANK (SOUTH DAKOTA) N.A. vs. SCOTT A. KERFOOT

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

Plaintiff

: IN THE COURT OF COMMON PLEAS

: CLEARFIELD COUNTY, PENNSYLVANIA

VS.

: NO. 04-1927-CD

SCOTT A KERFOOT
324 Sington Road
Morrisdale PA 16858-7526

Defendant

: CIVIL ACTION - LAW

Praecipe for Default Judgment

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:	\$15,511.80
	\$0.00
TOTAL	\$15,511.80

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**

W. A. Neil 3/11/05
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.

FILED 1000
m/12/4/2005 Notice
MAR 11 2005 to Def.
PLA William A. Shaw Statement to
Prothonotary/Clerk of Courts Atty
Atty pd. 20.00

CITIBANK (SOUTH DAKOTA) N.A.

: IN THE COURT OF COMMON PLEAS

Plaintiff
vs.

: CLEARFIELD COUNTY, PENNSYLVANIA

SCOTT A KERFOOT

Defendant

: NO. 04-1927-CD

: CIVIL ACTION - LAW

Notice of Intention to File Praecipe for Default Judgment

TO: Scott A Kerfoot
324 Sington Road
Morrisdale PA 16858-7526

DATE OF NOTICE: February 15, 2005

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-4252

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

COPY

CITIBANK (SOUTH DAKOTA) N.A.
Plaintiff

VS.

SCOTT A KERFOOT
Defendant

: IN THE COURT OF COMMON PLEAS
: CLEARFIELD COUNTY, PENNSYLVANIA
: NO. 04-1927-CD
: CIVIL ACTION - LAW

RULE OF CIVIL PROCEDURE NO. 236 (REVISED)

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

March 11, 2005

Prothonotary

By: _____ ed
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.: 2004-01927-CD

Real Debt: \$15,511.80

Atty's Comm: \$

Vs. Costs: \$

Int. From: \$

Scott A. Kerfoot
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: March 11, 2005

Expires: March 11, 2010

Certified from the record this 11th day of March, 2005.

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

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100040
NO: 04-1927-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: CITIBANK
vs.
DEFENDANT: SCOTT A. KERFOOT

SHERIFF RETURN

NOW, December 10, 2004 AT 9:29 AM SERVED THE WITHIN COMPLAINT ON SCOTT A. KERFOOT DEFENDANT AT 324 Sington Road, MORRISDALE, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO PENNY KERFOOT, WIFE A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DAVIS / MORGILLO

FILED 6/14/05
018:49101 cc
JAN 25 2005

William A. Shaw
Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	BURTON NEIL	3008	10.00
SHERIFF HAWKINS	BURTON NEIL	3007	37.87

Sworn to Before Me This

____ Day of _____ 2005

So Answers,

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

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.

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

SCOTT A KERFOOT
324 Sington Road, Morrisdale PA 16858-7526
Defendant

: NO. 04-1927-CD
: 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 2.07.04 pg 85
KCT/SH
DEC 03 2004

C-4252

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.
SCOTT A KERFOOT : CIVIL ACTION - LAW
324 Sington Road, Morrisdale, PA
Defendant

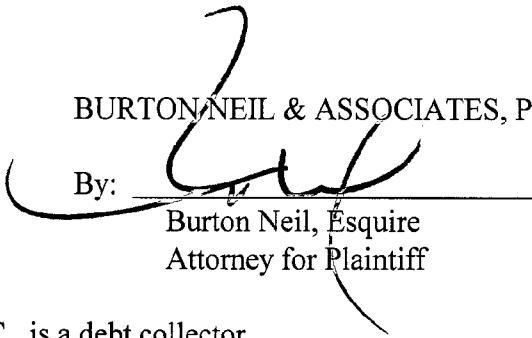
Complaint

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 Scott A Kerfoot, who resides at 324 Sington Road, Morrisdale, 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 5491492011210576 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 \$15,511.80.

Wherefore, plaintiff demands judgment against defendant for the sum of \$15,511.80, 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.

10/11/04 \$15511.80 \$9999.99 SITE:KC-CL TM:CO-5000 ACID:KCB7150
 PMT. DUE DATE NEW BALANCE MIN AMT. DUE 11/06/04 16:39:05:

SCOTT A KERFOOT
 324 SINGTON RD
 MORRISDALE
 16858-7526000

PA

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

Citi® Platinum Select® Card



Account Number
 5491 4920 1121 0576

Customer Service:

1-800-983-6453	Total Credit Line	Available Credit Line	Cash Advance Limit	Available Cash Limit	New Balance
PO Box 44167 Jacksonville, FL 32231-4167	\$13000	\$0	\$13000	\$0	\$15511.80
	Statement/ Closing Date	Amount Over Credit Line	Past Due	Purch/Adv Minimum Due	Minimum Amount Due
	09/16/2004	\$2511.80	\$997.21	\$309.00	\$15511.80

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
9/16			Standard Purch LATE FEE - AUG PAYMENT PAST DUE 66 0000 0	35.00
9/16			OVER CREDIT LIMIT FEE 62 0000 0	29.00
9/16			PURCHASES*FINANCE CHARGE*PERIODIC RATE 84 0000 0	212.92
9/16			Standard Adv ADVANCES*FINANCE CHARGE*PERIODIC RATE 84 0000 0	88.71

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.

IMPORTANT INFORMATION ABOUT CREDIT REPORTING:
 WE MAY REPORT INFORMATION ABOUT YOUR ACCOUNT TO CREDIT BUREAUS. LATE PAYMENTS, MISSED PAYMENTS, OR OTHER DEFAULTS ON YOUR ACCOUNT MAY BE REFLECTED IN YOUR CREDIT REPORT.

Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(-) New Balance
PURCHASES	\$10,691.61	\$64.00	\$0.00	\$212.92	\$10,968.53
ADVANCES	\$4,454.56	\$0.00	\$0.00	\$88.71	\$4,543.27
TOTAL	\$15,146.17	\$64.00	\$0.00	\$301.63	\$15,511.80

Days This Billing Period: 30

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES Standard Purch	\$10,794.17	0.06575%(D)	24.000%	24.000%
ADVANCES Standard Adv	\$4,497.29	0.06575%(D)	24.000%	24.000%

EXHIBIT A

VERIFICATION

Mark Retsche 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: 11/22/04



Scott A Kerfoot
5491492011210576