

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

**Praeceptum 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
	\$ .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 P.A.R.CIV.P. 236**

William A. Shaw 3/11/05  
Prothonotary

BURTON NEIL & ASSOCIATES, P.C.

BY: [Signature]

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**

1007  
m/2:46  
MAR 11 2005

William A. Shaw  
Prothonotary/Clerk of Courts

Notice  
to Def.

Statement to  
Atty

Atty pd. 20.00

C-4252

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

**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. Meholick  
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: \_\_\_\_\_ BN  
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

COPY

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<sup>614</sup>  
018:4701 No 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,

  
by Marilyn Hawkins

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

: NO. 04-1927-4

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

: 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 p. 85  
100 to SH  
DEC 03 2004

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.  
701 East 60th Street North, Sioux Falls, SD  
Plaintiff

: IN THE COURT OF COMMON PLEAS

: CLEARFIELD COUNTY, PENNSYLVANIA

v.

: NO.

SCOTT A KERFOOT  
324 Sington Road, Morrisdale, PA  
Defendant

: CIVIL ACTION - LAW

### **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 in 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  
 PMT DUE DATE NEW BALANCE MIN AMT DUE

SITE:KC-CL TM:CO-5000 ACID:KCB7150  
 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  
 PO Box 44167  
 Jacksonville, FL 32231-4167

Total Credit Line	Available Credit Line	Cash Advance Limit	Available Cash Limit	New Balance
\$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		<b>Standard Purch</b>	
			LATE FEE - AUG PAYMENT PAST DUE	35.00
	9/16		66 0000	700000000000
			OVER CREDIT LIMIT FEE	29.00
	9/16		62 0000	700000000000
			PURCHASES*FINANCE CHARGE*PERIODIC RATE	212.92
			84 0000	700000000000
	9/16		<b>Standard Adv</b>	
			ADVANCES*FINANCE CHARGE*PERIODIC RATE	88.71
			84 0000	700000000000

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

Nick Petsche 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