

04-1946-CD
MARLYN FINANCIAL SERVICES, LLC. vs. PATRICIA LOBB

MarLyn Fin et al vs Patricia Lobb
2004-1946-CD

STOCK & GRIMES, LLP
BY: Edward Stock, Esquire
I.D.# 13657
804 West Avenue
Jenkintown, PA 19046
(215) 576-1900

Attorney for Plaintiff

MARLYN FINANCIAL SERVICES, LLC,
ASSIGNEE OF CITIBANK
c/o Stock & Grimes, LLP
804 West Avenue
Jenkintown, PA 19046

COURT OF COMMON PLEAS
CLEARFIELD COUNTY
CIVIL ACTION-LAW

Plaintiff

vs.

PATRICIA LOBB
905 Don Street
Houtzdale, PA 16651

Defendant(s)

NO. 04-19-46-C

FILED
M a: 35 BA 1185-00
icet to dhf

DEC 06 2004

CIVIL ACTION

William A. Shaw
Prothonotary

"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 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 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.

"Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las páginas siguientes, usted tiene veinte (20) días de plazo al partir de la fecha de la demanda y la notificación. Hace falta asentar una comparecencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomará medidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted."

"LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELÉFONO A LA OFICINA CUYA DIRECCIÓN SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

LAWYERS REFERENCE SERVICE

Office of the Court Administrator
Clearfield County Courthouse
1 N. Second Street
Clearfield, PA 16830
(814) 765-2641 ext. 32

STOCK & GRIMES, LLP
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(215) 576-1900

Attorney for Plaintiff

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c/o STOCK & GRIMES, LLP
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Jenkintown, PA 19046
Plaintiff

COURT OF COMMON PLEAS
CLEARFIELD COUNTY
CIVIL ACTION-LAW

NO.

vs.

PATRICIA LOBB
905 Don Street
Houtzdale, PA 16651

Defendant(s)

CIVIL ACTION COMPLAINT

1. Plaintiff, MarLyn Financial Services, LLC, is the purchaser and assignee of the obligation under suit herein, and/or is the authorized representative of Citibank or the servicer of a credit card account issued by Citibank to the Defendant(s) herein, in accordance with a credit card agreement between Citibank and the Defendant.

2. Plaintiff, MarLyn Financial Services, LLC, is a limited liability company and is authorized to conduct business in the Commonwealth of Pennsylvania.

3. The Defendant(s), Patricia Lobb, is/are adult individual(s) residing at the address contained in the

above caption.

4. On sundry and various occasions, Defendant(s), with the use of a credit card(s) (#5424-1802-6171-2993) issued by Citibank pursuant to their credit card agreement(s), made various purchases of goods and/or merchandise with the use of the credit card(s) from authorized merchants.

5. The present outstanding balance which is due on the account(s) is \$14,107.03; and, although repeated requests and demands have been made upon the Defendant(s) to satisfy the same in accordance with the terms and conditions of the credit card agreement(s), the Defendant(s) has/have and still refuse(s) to pay the same.

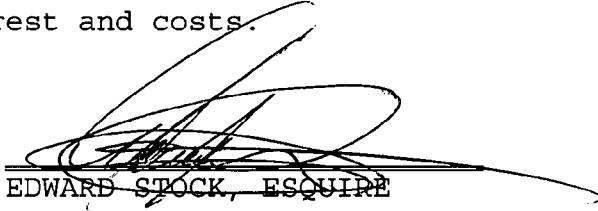
6. Plaintiff's investigation has determined that the Defendant(s) is not in the military service.

7. THIS COMMUNICATION IS FROM A DEBT COLLECTOR.
THIS IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

WHEREFORE, Plaintiff, MarLyn Financial Services, LLC, as the assignee and/or purchaser of the credit card account(s) with Citibank, demands Judgment against the Defendant(s), Patricia Lobb, in the sum

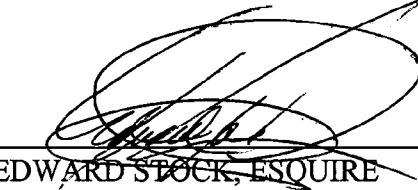
of \$14,107.03, with interest and costs.

DATE: 12/22/04


EDWARD STOCK, ESQUIRE

VERIFICATION

EDWARD STOCK, ESQUIRE, Attorney for Plaintiff herein, verifies that the statements made in this Pleading are true and correct and that he is authorized to make them on behalf of the Plaintiff. He understands that the statements herein are made subject to the penalties of 18 Pa. C.S.A. Sec. 4904, relating to unsworn falsification to authorities.



EDWARD STOCK, ESQUIRE

Department of Defense Manpower Data Center

DEC-03-2004 10:56:47



Military Status Report
Pursuant to the Servicemen's Civil Relief Act of 2003

Last Name	First	Middle	Begin Date	Active Duty Status	Service/Agency
LOBB	PATRICIA				
Currently not on Active Military Duty, based on the Social Security Number and last name provided.					

Upon searching the information data banks of the Department of Defense Manpower Data Center, the above is the current status of the Defendant(s), per the Information provided, as to all branches of the Military.

Robert J. Brandewie, Director
Department of Defense - Manpower Data Center
1600 Wilson Blvd., Suite 400
Arlington, VA 22209-2593

The Defense Manpower Data Center (DMDC) is an organization of the Department of Defense that maintains the Defense Enrollment and Eligibility Reporting System (DEERS) database which is the official source of data on eligibility for military medical care and other eligibility systems.

If you have information that makes you feel that the DMDC response is not correct, please fax your response to 703-696-4156 or call 703-696-6762 and further research will be done. For personal privacy reasons, SSNs are not available on this printed results page. Requesters submitting a SSN only receive verification that the SSN they submitted is a match or non-match.

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 1 of 1 Services

Sheriff Docket # **100051**

MARLYN FINANCIAL SERVICES, LLC

Case # 04-1946-CD

vs.

PATRICIA LOBB

SHERIFF RETURNS

NOW January 26, 2005 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT "NOT FOUND" AS TO PATRICIA LOBB, DEFENDANT. RESIDES IN BANGOR, PA. ph. (610-588-8840).

SERVED BY: /

Return Costs

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	MARLYN FINANCIAL	7022	10.00
SHERIFF HAWKINS	MARLYN FINANCIAL	7022	27.50

Sworn to Before me This

So Answers,

____ Day of _____ 2005


Chester A. Hawkins
Sheriff

01/27/2005
616
01/27/2005

2005
FBI - Pittsburgh Laboratory

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Attorney for Plaintiff

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COURT OF COMMON PLEAS
CLEARFIELD COUNTY
CIVIL ACTION-LAW

Plaintiff

vs.

PATRICIA LOBB
905 Don Street
Houtzdale, PA 16651

Defendant(s)

NO. 04-1946-0

I HEREBY CERTIFY THAT THE WRITTEN
TRUE AND CORRECT COPY OF THE
ORIGINAL FILED IN THIS MATTER

EDWARD STOCK

ATTORNEY FOR PLAINTIFF

CIVIL ACTION

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

DEC 06 2004

Attest.

W. A. R.
Patricia R.
Clerk of Courts

"AVISO"

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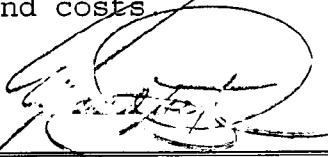
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DATE: 12-3-04


EDWARD STOCK, ESQUIRE

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EDWARD STOCK, ESQUIRE

Department of Defense Manpower Data Center

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CLEARFIELD COUNTY
CIVIL ACTION-LAW
NO. 04-1946-CD

Plaintiff

vs.

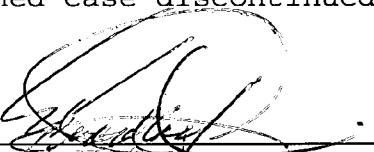
PATRICIA LOBB
905 Don Street
Houtzdale, PA 16651
Defendant(s)

PRAECIPE TO DISCONTINUE

TO THE PROTHONOTARY:

Kindly mark the above captioned case discontinued.

DATE: 3/21/05


EDWARD STOCK, ESQUIRE

FILED

MAR 28 2005

W/12151

William A. Shaw

Prothonotary/Clerk of Courts

1 CENS 4 DISG. 

ATTY

COPY TO C/R

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

MarLyn Financial Services, LLC
Citibank

Vs.
Patricia Wade Lobb

No. 2004-01946-CD

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 March 28, 2005, marked:

Discontinued

Record costs in the sum of \$85.00 have been paid in full by Atty. Stock.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 28th day of March A.D. 2005.

William A. Shaw, Prothonotary