

05-784-CD
Citibank vs. Lisa Kalgren

Citibank v. Lisa Kalgren
2005-784-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

FILED ^{icc}
mjl:4384 Shff
JUN 01 2005 App. pd.
85.00
William A. Shaw
Prothonotary/Clerk of Courts

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

: IN THE COURT OF COMMON PLEAS

Plaintiff
v.

: CLEARFIELD COUNTY, PENNSYLVANIA

LISA M KALGREN
2895 Hickory Road, Penfield PA 15849-3513

: NO. 05-784-CD

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

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.

LISA M KALGREN
2895 Hickory Road, Penfield PA 15849-3513
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 Lisa M Kalgren, who resides at 2895 Hickory Road, Penfield, 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 5424180184936224 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 \$4,944.55.

Wherefore, plaintiff demands judgment against defendant for the sum of \$4,944.55, 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.

07/13/04 \$4944.55 \$879.41
 PMT DUE DATE NEW BALANCE MCR AND SUR

SITE:KC-CL TM:CO-5000 ACID:KCB7150
 02/09/05 01:48:16:

LISA M KALGREN
 2895 HICKORY RD
 PENFIELD
 15849-3513000

PA

CITI CARDS
 P.O. BOX 8112
 S HACKENSACK, NJ
 07606-8112

Citi® Platinum Select® Card



Account Number
 5424 1801 8493 6224

Customer Service:

1-800-950-5114

BOX 6500
 SIOUX FALLS, SD
 57117

Total Credit Line	Available Credit Line	Cash Advance Limit	Available Cash Limit	New Balance
\$4500	\$0	\$2300	\$0	\$4944.55
Statement/ Closing Date	Amount Over Credit Line	Past Due	Purch/Adv Minimum Due	Minimum Amount Due
06/17/2004	\$444.55 +	\$319.05 +	\$115.81 =	\$879.41

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
6/17			Standard Purch	
			LATE FEE - MAY PAYMENT PAST DUE	35.00
6/17			66 0000	0000000000
			OVER CREDIT LIMIT FEE	35.00
6/17			62 0000	0000000000
			PURCHASES*FINANCE CHARGE*PERIODIC RATE	38.31
			84 0000	0000000000
6/17			Standard Adv	
			ADVANCES*FINANCE CHARGE*PERIODIC RATE	22.21
			84 0000	0000000000
6/17			Balance Transfer - Charged To Offer 5	
			PURCHASES*FINANCE CHARGE*PERIODIC RATE	50.29
			84 0000	0000000000

Your account is now 3 MONTHS PAST DUE and currently closed. 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.

Our records show home phone 814-637-5509 and business phone 814-965-4114. Please update coupon if incorrect.

Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(-) New Balance
PURCHASES	\$3,808.83	\$70.00	\$0.00	\$88.60	\$3,967.43
ADVANCES	\$954.91	\$0.00	\$0.00	\$22.21	\$977.12
TOTAL	\$4,763.74	\$70.00	\$0.00	\$110.81	\$4,944.55

Days This Billing Period: 30


Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$1,665.38	0.07668%(D)	27.990%	27.990%
Offer 5	\$2,186.10	0.07668%(D)	27.990%	27.990%
ADVANCES				
Standard Adv	\$965.60	0.07668%(D)	27.990%	27.990%

EXHIBIT

Verification

I, Amanda Carter am an employee of Citicorp Credit Services, Inc., (USA) which is by contract the service provider for plaintiff CITIBANK (SOUTH DAKOTA) N.A. retained to perform services including but not primarily limited to collecting delinquent debt. I am authorized to make this verification as attorney-in-fact for plaintiff under powers of attorney from plaintiff to Citicorp Credit Services, Inc. (USA) and to me. The foregoing averments of fact in the within pleading are true and correct to the best of my knowledge, information and belief. I understand that the statements made herein are subject to the penalties of 18 Pa. C.S. Section 4904, relating to unsworn falsification to the authorities.

Date: 05/04/05


Signature

Lisa M Kalgren
5424180184936224
C-2973

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100518
NO: 05-784-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: CITIBANK (SOUTH DAKOTA) N.A.
vs.
DEFENDANT: LISA M. KALGREN

SHERIFF RETURN

NOW, June 09, 2005 AT 2:19 AM SERVED THE WITHIN COMPLAINT ON LISA M. KALGREN DEFENDANT AT 2895 HICKORY ROAD, PENFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO LISA KALGREN, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: COUDRIET / DEHAVEN

OK FILED
01/11:00 AM
JUN 13 2005



William A. Shaw
Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	NEIL	9170	10.00
SHERIFF HAWKINS	NEIL	9169	31.33

Sworn to Before Me This

_____ Day of _____ 2005

So Answers,


by 
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.
Plaintiff

VS.

LISA M KALGREN
Defendant

: IN THE COURT OF COMMON PLEAS
:
: CLEARFIELD COUNTY, PENNSYLVANIA
:
: NO. 05-784-CD
:
: CIVIL ACTION - LAW

PRAECIPE TO DISCONTINUE

TO THE PROTHONOTARY:

Kindly discontinue the above-captioned action without prejudice.

BURTON NEIL & ASSOCIATES, P.C.

BY: [Signature]
Burton Neil, Esquire
Attorney for Plaintiff

FILED ^{GP} NO CC
mjs:2051
JUL 18 2005
William A. Shaw
Prothonotary/Clerk of Courts
Cert. of Disc. to
Atty
Copy to CIA

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

C-2973



IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

 COPY

Citibank (South Dakota) N.A.

Vs.

No. 2005-00784-CD

Lisa M. Kalgren

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 July 18, 2005, marked:

Discontinued without Prejudice

Record costs in the sum of \$85.00 have been paid in full by Burton Neil, Esq.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 18th day of July A.D. 2005.

William A. Shaw, Prothonotary