

05-784-CD

Citibank vs. Lisa Kalgren

2005-784-CD

Citibank v. Lisa Kalgren

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 1cc  
M 11:43 AM Sh ff  
JUN 01 2005 Atty 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 : CLEARFIELD COUNTY, PENNSYLVANIA  
v.

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

: NO. 05-784-CJ

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

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1060 Andrew Drive, Suite 170

West Chester, PA 19380

610-696-2120

Attorney for Plaintiff

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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.

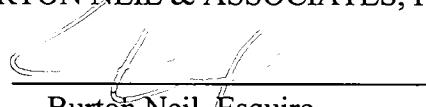
7. Defendant received the monthly statements from plaintiff for the credit card account including the statement attached hereto as Exhibit A statement without protest, dispute or objection.

8. Defendant 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 \$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 SITE:KC-CL TM:CO-5000 ACID:KCB7150  
 PREV. DUE: 06/14 NEW BALANCE: 06/13 MIN. AMT. DUE: 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	Total Credit Line	Available Credit Line	Cash Advance Limit	Available Cash Limit	New Balance
BOX 6500 SIOUX FALLS, SD 57117	\$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 66 0000	35.00 0000000000
6/17			OVER CREDIT LIMIT FEE 62 0000	35.00 0000000000
6/17			PURCHASES*FINANCE CHARGE*PERIODIC RATE 84 0000	38.31 0000000000
6/17			Standard Adv ADVANCES*FINANCE CHARGE*PERIODIC RATE 84 0000	22.21 0000000000
6/17			Balance Transfer - Charged To Offer 5 PURCHASES*FINANCE CHARGE*PERIODIC RATE 84 0000	50.29 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

FILED  
06/11/05  
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

So Answers,

\_\_\_\_ Day of \_\_\_\_\_ 2005

*Chester A. Hawkins*  
*by Marley Haskin*  
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. : IN THE COURT OF COMMON PLEAS  
Plaintiff : CLEARFIELD COUNTY, PENNSYLVANIA  
VS. : NO. 05-784-CD  
LISA M KALGREN : CIVIL ACTION - LAW  
Defendant

PRAECIPE TO DISCONTINUE

TO THE PROTHONOTARY:

Kindly discontinue the above-captioned action without prejudice.

BURTON NEIL & ASSOCIATES, P.C.

BY: 

Burton Neil, Esquire  
Attorney for Plaintiff

FILED <sup>(64)</sup>  
M 12 2005 NO CC  
JUL 18 2005 Cert. of Disc. to  
William A. Shaw  
Prothonotary/Clerk of Courts  
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

 COPY

CIVIL DIVISION

Citibank (South Dakota) N.A.

Vs.  
Lisa M. Kalgren

No. 2005-00784-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 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.

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William A. Shaw, Prothonotary