

Discover Bank vs Andrew Campbell
2005-1068-CD

05-1068-CD
Discover Bank

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DISCOVER BANK : NO. 05-1068-CD
 ISSUER OF THE DISCOVER CARD :
 3311 MILL MEADOW DRIVE :
 HILLIARD, OH 43026 :
 Plaintiff :
 VS. : CIVIL ACTION - LAW
 ANDREW C CAMPBELL :
 514 S 2ND ST :
 CLEARFIELD PA 16830 :
 Defendant(s) :

FILED
 mla:38/01 Attypd
 JUL 25 2005 8500

William A. Shaw
 Prothonotary/Clerk of Courts

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 an 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 or any other claim or relief requested by the Plaintiff. You may lose money or property 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 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.

NOTICIA

Le han demandado a usted en la corte. Si usted quiere defensas de esas demandas expuestas en las páginas siguientes, usted tiene veinte (20) días de plazo al partir de la fecha de la demanda y la notificación. Usted debe presentar una apariencia escrita o en persona o por abogado y archivar en la corte en forma escrita sus defensas o sus objeciones a las demandas en corta de su persona. Se agradece que si usted no se defienda, la corte tomará medidas y pedirá entrar una orden contra usted sin previo aviso o notificación y por cualquier queja o alivio que es pedido en la petición de demanda. Usted puede perder dinero o sus propiedades o otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO IMMEDIATAMENTE. 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.

PA Lawyer Referral Service
 Pennsylvania Bar Assn.
 P.O. Box 186

Harrisburg
 800-692-7375

PA 17108

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DISCOVER BANK : NO.
ISSUER OF THE DISCOVER CARD :
3311 MILL MEADOW DRIVE :
HILLIARD, OH 43026 :
Plaintiff :
VS. : CIVIL ACTION - LAW
ANDREW C CAMPBELL :
514 S 2ND ST :
CLEARFIELD PA 16830 :
Defendant(s) :

COMPLAINT

Now comes the Plaintiff, DISCOVER BANK , by and through its attorneys, and the law firm of Wolpoff & Abramson, L.L.P., and files this Complaint and in support avers as follows:

1. Plaintiff, DISCOVER BANK
ISSUER OF THE DISCOVER CARD
3311 MILL MEADOW DRIVE
HILLIARD, OH 43026

is a business entity doing business within the Commonwealth of Pennsylvania and the other states of the United States.

2. Defendant, ANDREW C CAMPBELL , is an adult individual with a last known address of

514 S 2ND ST
CLEARFIELD PA 16830

COUNTY OF CLEARFIELD

3. It is averred that Defendant(s) was/were issued an open end credit card account.

4. At all relevant times material hereto, Defendant(s) has/have used said charge card for the purchase of products, goods and/or for obtaining services.

5. Plaintiff provided Defendant(s) with copies of the Statements of Account showing all debits and credits for transactions on the aforementioned credit card account to which there was no bona fide objection by Defendant(s). A true and correct copy of the Statement of Account is attached hereto, incorporated herein, and marked as Exhibit "A".

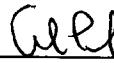
6. As of the date of this Complaint, the remaining balance due, owing and unpaid on Defendant's credit card account as a result of the charges made by said Defendant(s) and/or any authorized users is the sum of \$ 5662.76.

7. Despite reasonable and repeated demands for payment, Defendant(s) has/have refused and continue to refuse to pay all sums due and owing on the aforementioned account balance, all to the damage and detriment of the Plaintiff.

8. The amount in controversy is within the jurisdictional amount requiring compulsory arbitration.

WHEREFORE, Plaintiff respectfully requests this Honorable Court enter Judgment in favor of the Plaintiff and against Defendant(s) in the amount of \$ 5662.76, plus costs of this action and any other relief as this Court deems just and reasonable.

Respectfully submitted,



Amy F. Doyle	#87062
Daniel F. Wolfson	#20617
Bruce H. Cherkis	#18837
Philip C. Warholic	#86341
Ronald M. Abramson	#94266
Ronald S. Canter	#94000
Donald P. Shiffer	#89451
Andrew C. Spears	#87737
WOLPOFF & ABRAMSON, L.L.P. / Counsel for Plaintiff	
Attorneys in the Practice of Debt Collection	
4660 Trindle Road, 3rd Floor, Camp Hill, PA 17011	
(717) 303-6700	

ATTORNEY VERIFICATION

I hereby state that I am the attorney for the Plaintiff, who is located outside of this jurisdiction and in order to file the within document in an expedient and timely manner, am authorized to take this verification on behalf of said Plaintiff in this action and verify that the statements made in the foregoing Complaint are true and correct to the best of my knowledge, information, and belief, based upon information provided by the Plaintiff.

The undersigned understands that false statements herein are made subject to the penalties of 18 Pa.C.S. Section 4904, relating to unsworn falsification to authorities.

Date: 7/14/05

Will

Amy F. Doyle	#87062
Daniel F. Wolfson	#20617
Bruce H. Cherkis	#18837
Philip C. Warholic	#86341
Ronald M. Abramson	#94266
Ronald S. Canter	#94000
Donald P. Shiffer	#89451
Andrew C. Spears	#87737
WOLPOFF & ABRAMSON, L.L.P. / Counsel for Plaintiff	
Attorneys in the Practice of Debt Collection	
4660 Trindle Road, 3rd Floor, Camp Hill, PA 17011	
(717) 303-6700	

92579

EXHIBIT "A"

12662

File Number 137568618 Media Number 05062000947

Account Number 6011002900322595
PROVIDER DISCOVER BANK/GOLD CARD

PAGE 1

CLIENT NO 001824 Discover Financial Services ACCT#6011002900322595
ACCOUNT#---60CHG OFF AMT-\$5,662.76 CHG OFF DATE-06/30/04
INT RATE---0000 LAST INT DATE-
CHG OFF RSN---0000 ACCT STATUS--433
***** PRIMARY DEBTOR *****
LAST NAME---CAMPBELL FIRST NAME--ANDREW C
DOB--- TITLE--
== HOME INFORMATION == == == WORK INFORMATION == == ==
HOME PHONE#-000-0000 HM PH FLG-R WORK PHONE#-000-0000 WK PH FLG-R
HOME ADDR1---514 S 2ND ST EMPLOYER---
ADDR2 CITY/STCLEARFIELD PA 68302-0620 COUNTY-----
RECORD-TYPE-A SEQ NO-----00
LOAN-TYPE GOLD LENDING OFC---000001
ATTNY CD -- CHG OFF RSN---0000
DEALER CODE-- RECEIPT DATE-06/30/04
ASSOC COST---\$..00 ACC INTREST---\$..00
CUR BAL---\$5,662.76
COMMENT DATE-03/02/05
LST COMMENT--
ADD: 9212 BERGER RD #100 COLUMBIA MD
NET PRIN---00056627F NET ASSC COST-00000000{ PREV ATTY BERMAN 888-868-4490
SECOND NAME-- MTHLY INCOME-\$..00 OTHER INCOME-\$..00
MTHLY PYMT---\$..00 OTHER OBLIG---\$..00 RENT CODE---
RCVRY SCORE---0151 LSTPYMT DATE-11/26/03
LSTCONT DATE- COMM RATE---2400 ADDR FLAG----Y
CUST ID-SSN---XXX-XX-3088
PARNT ORG CD-MRO1 AGENCY CODE--2A35 FORMAT CODEA-B
U20 CRD LIMIT---000350000 U18-CAS-ADV OUT---000130627 U01 EXT STAT CD--Z
U25 CB RPT IND---1 BANK ACCT NO---0000004230198552
TERM LEVEL BRAND TYPE---14DC

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 1 of 1 Services

Sheriff Docket # 100666

DISCOVER BANK

Case # 05-1068-CD

vs.

ANDREW C. CAMPBELL

TYPE OF SERVICE COMPLAINT

SHERIFF RETURNS

NOW December 02, 2005 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT "NOT FOUND" AS TO ANDREW C. CAMPBELL, DEFENDANT. MOVED, LEFT NO FORWARDING ADDRESS.

SERVED BY: /

Return Costs

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	WOLPOFF	903877	10.00
SHERIFF HAWKINS	WOLPOFF	903877	16.37

Sworn to Before me This

So Answers,

____ Day of _____ 2005

*Chester A. Hawkins
by Marilyn Hawn*
Chester A. Hawkins
Sheriff

FILED
d400&L
DEC 02 2005

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DISCOVER BANK : NO. 05-1068-CD
 ISSUER OF THE DISCOVER CARD :
 3311 MILL MEADOW DRIVE :
 HILLIARD, OH 43026 :
 :
 Plaintiff :
 :
 VS. CIVIL ACTION - LAW :
 :
 ANDREW C CAMPBELL :
 514 S 2ND ST :
 CLEARFIELD PA 16830 :
 :
 Defendant(s) :
 NOTICE Attest.

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

JUL 25 2005

William B. Hause
 Prothonotary/
 Clerk of Courts

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 an 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 or any other claim or relief requested by the Plaintiff. You may lose money or property 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 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.

NOTICIA

Le han demandado a usted en la corte. Si usted quiere defensas de esas demandas expuestas en las páginas siguientes, usted tiene veinte (20) días de plazo al partir de la fecha de la demanda y la notificación. Usted debe presentar una apariencia escrita o en persona o por abogado y archivar en la corte en forma escrita sus defensas o sus objeciones a las demandas en corta de su persona. Sea avisado que si usted no se defiende, la corte tomará medidas y pedirá entrar una orden contra usted sin previo aviso o notificación y por cualquier queja o alivio que es pedido en la petición de demanda. Usted puede perder dinero o sus propiedades o otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO IMMEDIATAMENTE. 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.

PA Lawyer Referral Service
 Pennsylvania Bar Assn.
 P.O. Box 186

Harrisburg
 800-692-7375

PA 17108

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DISCOVER BANK : NO.
ISSUER OF THE DISCOVER CARD :
3311 MILL MEADOW DRIVE :
HILLIARD, OH 43026 :
Plaintiff :
VS. : CIVIL ACTION - LAW
ANDREW C CAMPBELL :
514 S 2ND ST :
CLEARFIELD PA 16830 :
Defendant(s) :

COMPLAINT

Now comes the Plaintiff, DISCOVER BANK , by and through its attorneys, and the law firm of Wolpoff & Abramson, L.L.P., and files this Complaint and in support avers as follows:

1. Plaintiff, DISCOVER BANK
ISSUER OF THE DISCOVER CARD
3311 MILL MEADOW DRIVE
HILLIARD, OH 43026

is a business entity doing business within the Commonwealth of Pennsylvania and the other states of the United States.

2. Defendant, ANDREW C CAMPBELL , is an adult individual with a last known address of

514 S 2ND ST
CLEARFIELD PA 16830

COUNTY OF CLEARFIELD

3. It is averred that Defendant(s) was/were issued an open end credit card account.

4. At all relevant times material hereto, Defendant(s) has/have used said charge card for the purchase of products, goods and/or for obtaining services.

5. Plaintiff provided Defendant(s) with copies of the Statements of Account showing all debits and credits for transactions on the aforementioned credit card account to which there was no bona fide objection by Defendant(s). A true and correct copy of the Statement of Account is attached hereto, incorporated herein, and marked as Exhibit "A".

6. As of the date of this Complaint, the remaining balance due, owing and unpaid on Defendant's credit card account as a result of the charges made by said Defendant(s) and/or any authorized users is the sum of \$ 5662.76.

7. Despite reasonable and repeated demands for payment, Defendant(s) has/have refused and continue to refuse to pay all sums due and owing on the aforementioned account balance, all to the damage and detriment of the Plaintiff.

8. The amount in controversy is within the jurisdictional amount requiring compulsory arbitration.

WHEREFORE, Plaintiff respectfully requests this Honorable Court enter Judgment in favor of the Plaintiff and against Defendant(s) in the amount of \$ 5662.76, plus costs of this action and any other relief as this Court deems just and reasonable.

Respectfully submitted,



Amy F. Doyle	#87062
Daniel F. Wolfson	#20617
Bruce H. Cherkis	#18837
Philip C. Warholic	#86341
Ronald M. Abramson	#94266
Ronald S. Canter	#94000
Donald P. Shiffer	#89451
Andrew C. Spears	#87737
WOLPOFF & ABRAMSON, L.L.P. / Counsel for Plaintiff	
Attorneys in the Practice of Debt Collection	
4660 Trindle Road, 3rd Floor, Camp Hill, PA 17011	
(717) 303-6700	

ATTORNEY VERIFICATION

I hereby state that I am the attorney for the Plaintiff, who is located outside of this jurisdiction and in order to file the within document in an expedient and timely manner, am authorized to take this verification on behalf of said Plaintiff in this action and verify that the statements made in the foregoing Complaint are true and correct to the best of my knowledge, information, and belief, based upon information provided by the Plaintiff.

The undersigned understands that false statements herein are made subject to the penalties of 18 Pa.C.S. Section 4904, relating to unsworn falsification to authorities.

Date: 7/14/05

Al

Amy F. Doyle	#87062
Daniel F. Wolfson	#20617
Bruce H. Cherkis	#18837
Philip C. Warholic	#86341
Ronald M. Abramson	#94266
Ronald S. Canter	#94000
Donald P. Shiffer	#89451
Andrew C. Spears	#87737
WOLPOFF & ABRAMSON, L.L.P. / Counsel for Plaintiff	
Attorneys in the Practice of Debt Collection	
4660 Trindle Road, 3rd Floor, Camp Hill, PA 17011	
(717) 303-6700	

92578

EXHIBIT "A"

12663 File Number 137568618 Media Number 05062000947 Account Number 6011002900322595 PROVIDER DISCOVER BANK/GOLD CARD

CLIENT NO 001824 Discover Financial Services ACCT#6011002900322595
ACCOUNT#---60CHG OFF AMT-\$5,662.76 CHG OFF DATE-06/30/04
INT RATE---0000 LAST INT DATE-
CHG OFF RSN---0000 ACCT STATUS--433

***** PRIMARY DEBTOR *****
LAST NAME---CAMPBELL

DOB---
== HOME INFORMATION == == ==

HOME PHONE#-000-0000 HM PH FLG-R
HOME ADDR1---514 S 2ND ST
ADDR2

CITY/STCLEARFIELD PA 68302-0620 COUNTY-----
RECORD-TYPE-A SEQ NO-----00
LOAN-TYPE GOLD LENDING OFC---000001
ATTNY CO --
DEALER CODE--

ASSOC COST---\$..00 CHG OFF RSN---0000
CUR BAL---\$5,662.76 RECEIPT DATE-06/30/04
ACC INTREST---\$..00
COMMENT DATE-03/02/05
LST COMMENT--

CITY/STCLEARFIELD PA 68302-0620 COUNTY-----
RECORD-TYPE-A SEQ NO-----00
LOAN-TYPE GOLD LENDING OFC---000001
ATTNY CO --
DEALER CODE--

ASSOC COST---\$..00 CHG OFF RSN---0000
CUR BAL---\$5,662.76 RECEIPT DATE-06/30/04
ACC INTREST---\$..00
COMMENT DATE-03/02/05
LST COMMENT--

ADD: 9212 BERGER RD #100 COLUMBIA MD
NET PRIN---00056627F NET ASSC COST-00000000{
SECOND NAME-- MTHLY INCOME-\$..00
MTHLY PYMT---\$..00 OTHER OBLIG---\$..00
RCVRY SCORE--0151
LSTCONT DATE-
CUST ID-SSN--XXX-XX-3088
PARNT ORG CD-MRO1
U20 CRD LIMIT---000350000
U25 CB RPT IND--1
TERM LEVEL BRAND TYPE---14DC

PREV ATTY BERMAN 888-868-4490

NET INTER---00000000{
OTHER INCOME-\$..00
RENT CODE---
LSTPYMT DATE-11/26/03
ADDR FLAG----Y

COMM RATE---2400
AGENCY CODE--2A35
U18-CAS-ADV OUT---000130627
BANK ACCT NO---0000004230198552

Notice of Proposed Termination of Court Case

March 2, 2012

RE: 2005-01068-CD

Discover Bank

Vs.

Andrew C. Campbell

3/2/2012
S 3/2/2012
William A. Gray
Prothonotary/Clerk of Courts
OK

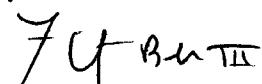
To All Parties and Counsel:

Please be advised that the Court intends to terminate the above captioned case without notice, because the Court records show no activity in the case for a period of at least two years.

You may stop the Court terminating the case by filing a Statement of Intention to Proceed. The Statement of Intention to Proceed must be filed with the **Prothonotary of Clearfield County, PO Box 549, Clearfield, Pennsylvania 16830**. The Statement of Intention to Proceed must be filed on or before **May 2, 2012**.

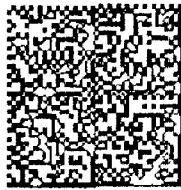
If you fail to file the required statement of intention to proceed within the required time period, the case will be terminated.

By the Court,


F. Cortez Bell, III, Esq.
Court Administrator

William A. Shaw
Prothonotary/Clerk of Courts
PO Box 549
Clearfield, PA 16830
2330/6
MAK 06 2012
FILED
6-8-01 - 5002

016H26524836
\$ 00.450
03/02/2012
Mailed From 16830
US POSTAGE
Harter



Andrew C. Campbell
514 S. 2nd Street
Clearfield PA 16830

152 SE 1 00 03/05/12
NOT DELIVERABLE TO SENDER
UNABLE TO FORWARD
RC : 16830054549 *2343-08227-02-39
168300549 [REDACTED]
168300549 [REDACTED]

William A. Shaw
Prothonotary/Clerk of Courts
PO Box 549
Clearfield, PA 16830

016H26524836
\$00.450
03/02/2012
Mailed From 16830
US POSTAGE



02-8701-5002

Andrew C. Campbell
514 S. 2nd Street
Clearfield PA 16830

Utility

NIXIE 152 SE 1 00 03/05/12
NOT DELIVERABLE TO SENDER
AS ADDRESSED
UNABLE TO FORWARD

EC: 168300054849 20343-06227-02-39
1683000549 [REDACTED]

Notice of Proposed Termination of Court Case

March 2, 2012

RE: 2005-01068-CD

Discover Bank

Vs.

Andrew C. Campbell

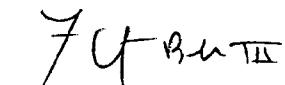
To All Parties and Counsel:

Please be advised that the Court intends to terminate the above captioned case without notice, because the Court records show no activity in the case for a period of at least two years.

You may stop the Court terminating the case by filing a Statement of Intention to Proceed. The Statement of Intention to Proceed must be filed with the **Prothonotary of Clearfield County, PO Box 549, Clearfield, Pennsylvania 16830**. The Statement of Intention to Proceed must be filed on or before **May 2, 2012**.

If you fail to file the required statement of intention to proceed within the required time period, the case will be terminated.

By the Court,



F. Cortez Bell, III, Esq.
Court Administrator

**IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION**

DISCOVER BANK
Plaintiff
vs.
ANDREW C. CAMPBELL
Defendant

ORDER

4 FILED

Z MAR 18 2013

0/9:00/WSAS

William A. Straw

William A. Shaw
Prothonotary/Clerk of Courts

NOW, this 15th day of March, 2013, upon the Court's review of the record, with the Court noting from the docket there has been no activity in the case since December 2, 2005, and that a Notice of Proposed Termination of Court Case had been mailed to the parties March 2, 2012 with no response having been received, pursuant to the provisions of Rule of Judicial Administration 1901 the case is hereby DISMISSED for inactivity. The Prothonotary shall code the case in Full Court as Z-1901A.

BY THE COURT,

FREDERIC J. AMMERMAN
President Judge

FREDRIC J. AMMERMAN
President Judge