

05-1068-CD  
Discover Bank vs Andrew Campbell

Discover Bank vs Andrew Campbell  
2005-1068-CD

## IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

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

NO. 05-1068-CD

**FILED** 1005HFF  
m/12:38/01 Amy pd  
JUL 25 2005.m 8500

Plaintiff

VS.

CIVIL ACTION - LAW

ANDREW C CAMPBELL

514 S 2ND ST  
CLEARFIELD PA 16830

Defendant(s)

## 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 paginas, siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Usted debe presentar una apariciencia escrita o en persona o por abogado y archivar en la corte en forma escrita sus defensas o sus objeciones a las demandas en corte de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y podria entrar una orden contra usted sin previo aviso o notificacion y por cualquier queja o alivio que es pedido en la peticion de demanda. Usted puede perder dinero o sus propiedades o otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION 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

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

: NO.

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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,

*Cell*

Amy F. Doyle	#87062
Daniel F. Wolfson	#20617
Bruce H. Cherkis	#18837
Philip C. Warholie	#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



---

Amy F. Doyle	#87062
Daniel F. Wolfson	#20617
Bruce H. Cherkis	#18837
Philip C. Warholic	#86341
Ronald M. Abramson	#94266
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Attorneys in the Practice of Debt Collection  
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(717) 303-6700

EXHIBIT "A"

12662

File Number 137568618

Media Number 05062000947

Account Number 601002900322595  
PROVIDER DISCOVER BANK/GOLD CARD

PAGE 1

CLIENT NO 001824 Discover Financial Services ACCT#601002900322595  
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-----

FIRST NAME--ANDREW C  
TITLE--

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

== == WORK INFORMATION == ==  
WORK PHONE#-000-0000 WK PH FLG-R  
EMPLOYER----

CITY/ST/CLEARFIELD PA 68302-0620

COUNTY-----

RECORD-TYPE-A

SEQ NO-----00

CUST TYPE---I

LOAN-TYPE GOLD

LENDING OFC--000001

USER FIELD --  
AGENCY CODE--2A35

ATTRNY CD --

CHG OFF RSN--0000

ACCT STATUS--433

DEALER CODE--

RECEIPT DATE-06/30/04

CONTRACTDATE-04/26/01

ASSDC COST---\$.00

ACC INTEREST--\$.00

COMMENT DATE-03/02/05

ADD: 9212 BERGER RD #100 COLUMBIA MD

PREV ATTY BERMAN 888-868-4490

NET PRIN---00056627F

NET ASSC COST-000000000{

NET INTER--000000000{

MTLHY PYMT---\$.00

MTLHY INCOME-\$\$.00

OTHER INCOME-\$\$.00

RCVRY SCORE--0151

OTHER OBLIG--\$.00

RENT CODE-----  
LSTPYMT DATE-11/26/03

LSTCONT DATE-

COMM RATE---2400

ADDR FLAG---Y

CUST ID-SSN--XXX-XX-3088

AGENCY CODE--2A35

FORMAT CODEA-B

PARNT ORG CD-MR01

U18-CAS-ADV OUT--000130627

U01 EXT STAT CD--Z

U25 CB RPT IND--1

BANK ACCT NO-----0000004230198552

U01 EXT STAT CD--Z

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: /

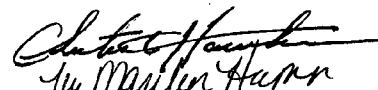
**Return Costs**

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

Sworn to Before me This

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

So Answers,

  
by Marilyn Harris  
Chester A. Hawkins  
Sheriff

**FILED**  
d4:0081  
DEC 02 2005

William A. Shaw  
Prothonotary/Clerk of Courts



## IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

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

: NO. 05-1068-CD

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Plaintiff

:

VS.

CIVIL ACTION - LAW

:

ANDREW C CAMPBELL

:

514 S 2ND ST  
CLEARFIELD PA 16830

:

:

Defendant(s)

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

JUL 25 2005

NOTICE

Attest.

*William L. Shaw*  
Prothonotary/  
Clerk of Courts

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ANDREW C CAMPBELL

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514 S 2ND ST

CLEARFIELD PA 16830

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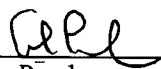
WOLPOFF & ABRAMSON, L.L.P. / Counsel for Plaintiff  
 Attorneys in the Practice of Debt Collection  
 4660 Trindle Road, 3rd Floor, Camp Hill, PA 17011  
 (717) 303-6700

## 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

  
\_\_\_\_\_  
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

2.

EXHIBIT "A"

12663  
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 == == ==  
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/ST/CLEARFIELD PA 68302-0620 COUNTY-----  
RECORD-TYPE-A SEQ NO-----00 CUST TYPE--I  
LOAN-TYPE GOLD LENDING OFC--000001 USER FIELD --  
ATTRNY CD -- CHG OFF RSN--0000 AGENCY CODE--2A35  
DEALER CODE-- RECEIPT DATE-06/30/04 ACCT STATUS--433  
ASSOC COST--\$.00 ACC INTREST--\$.00 CONTRACTDATE-04/26/01

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-000000000{ PREV ATTY BERMAN 888-868-4490  
SECOND NAME-- MTHLY INCOME-\$ .00  
MTHLY PYMT---\$.00 OTHER OBLIG--\$.00  
RCVRY SCORE--0151 COMM RATE---2400  
LSTCONT DATE- AGENCY CODE--2A35  
CUST ID-SSN--XXX-XX-3088 U18-CAS-ADV OUT--000130627 U01 EXT STAT CD--Z  
PARNT ORG CD-MR01 BANK ACCT NO-----0000004230198552  
U20 CRD LIMIT--000350000  
U25 CB RPT IND--1  
TERM LEVEL BRAND TYPE---14DC

## Notice of Proposed Termination of Court Case

March 2, 2012

RE: 2005-01068-CD

Discover Bank

Vs.

Andrew C. Campbell

FILED  
MAR 02 2012  
William A. Shaw  
Prothonotary/Clerk of Courts OK

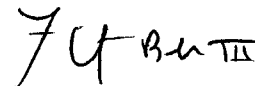
To All Parties and Counsel:

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

2005-1068-CD

FILED

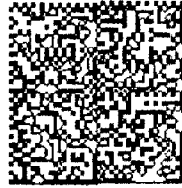
MAK 06 2012

W/23/2012

Prothonotary/Clerk of Courts  
William A. Shaw

UTX

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



Hasler

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03/02/2012

Mailed From 16830

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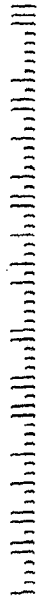
152 SE 1

00 03/05/12

RETURN TO SENDER  
NOT DELIVERABLE AS ADDRESSED  
UNABLE TO FORWARD

EC: 158300054949 \*2343-00227-02-39

1583000549





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

2005-8701-5002  
FILED  
MAR 23 2012  
Prothonotary/Clerk of Courts

UTX

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

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\$00.45  
03/02/2012  
Mailed From 16830  
US POSTAGE



Hasler

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RETURN TO SENDER  
NOT DELIVERABLE AS ADDRESSED  
UNABLE TO FORWARD

EC: 16830054949 \*2043-00227-02-39

1683000549



## Notice of Proposed Termination of Court Case

March 2, 2012

RE: 2005-01068-CD

Discover Bank

Vs.

Andrew C. Campbell

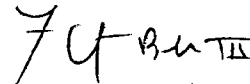
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By the Court,

A handwritten signature in black ink, appearing to read "F. Cortez Bell, III".

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

\* NO. 2005-1068-CD  
\*  
\*  
\*  
\*  
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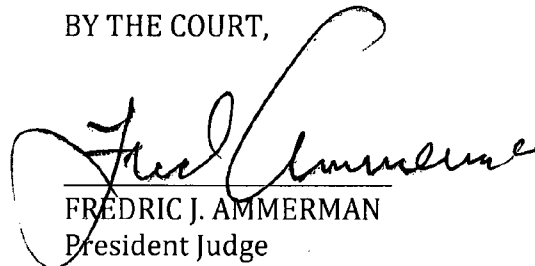
9 FILED

Z MAR 18 2013  
01:00/WAS  
William A. Shaw  
Prothonotary/Clerk of Courts

**ORDER**

NOW, this 15<sup>th</sup> 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,

  
FREDRIC J. AMMERMAN  
President Judge