

05-1310-CD
Citibank vs Darren L. Skaggs

Citibank, N.A. vs. Darren Skaggs
2005-1310-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

AUG 26 2005
m/w/10/05
William A. Shaw
Prothonotary/Clerk of Courts
I went to Shaw

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

: IN THE COURT OF COMMON PLEAS
: CLEARFIELD COUNTY, PENNSYLVANIA
: NO. 2005-1310-CD
DARREN L SKAGGS
314 S Church Street, Du Bois PA 15801-1961
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. Meholick
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830

Jan 23, 2006 Document
Reinstated/Reissued to Sheriff/Attorney Telephone No. 814-765-2641 Ext. 5982
for service.

C-6758 *William A. Shaw*
Deputy Prothonotary



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

701 East 60th Street North, Sioux Falls, SD

Plaintiff

: CLEARFIELD COUNTY, PENNSYLVANIA

v.

: NO.

DARREN L SKAGGS

314 S Church Street, Du Bois PA 15801-1961

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 Darren L Skaggs, who resides at 314 S Church Street, Du Bois, 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 5424181014218353 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.

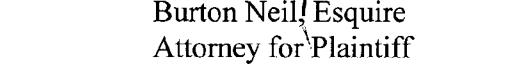
6. Plaintiff mailed defendant a written statement each month which accurately stated the debits and credits to the credit card account for the prior billing period.

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 \$6,739.21.

Wherefore, plaintiff demands judgment against defendant for the sum of \$6,739.21, 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.

04/21/05 \$6739.21 \$9999.99 SITE:KC-CL TM:CO-5000 ACID:KCB7150
 06/15/05 20:11:00: C-6758

DARREN L SKAGGS
 314 S CHURCH ST
 DU BOIS
 15801-1961000

PA

CITI CARDS
 PO BOX 183068
 COLUMBUS, OH
 43218-3068

Citi® Dividend Platinum Select® Card



Account Number
 5424 1810 1421 8353

Customer Service:

| 1-800-568-5000 | Total Credit Line | Available Credit Line | Cash Advance Limit | Available Cash Limit | New Balance |
|--------------------------------------|----------------------------|----------------------------|--------------------|--------------------------|-----------------------|
| BOX 6500 SIOUX FALLS, SD 57117 | \$6600 | \$0 | \$2000 | \$0 | \$6739.21 |
| | Statement/ Closing Date | Amount Over Credit Line | Past Due | Purch/Adv Minimum Due | Minimum Amount Due |
| | 03/28/2005 | \$139.21 + | \$709.55 | \$177.38 | \$6739.21 |

| Sale Date | Post Date | Reference Number | Activity Since Last Statement | Amount |
|-----------|-----------|------------------|---|------------------|
| 3/28 | | | Standard Purch LATE FEE - FEB PAYMENT PAST DUE 66 0000 | 39.00 |
| 3/28 | | | PURCHASES*FINANCE CHARGE*PERIODIC RATE 84 0000 | 0000000000 6.31 |
| 3/28 | | | Balance Transfer - Charged To Offer 5 PURCHASES*FINANCE CHARGE*PERIODIC RATE 84 0000 | 0000000000 20.30 |
| 3/28 | | | Balance Transfer - Charged To Offer 6 PURCHASES*FINANCE CHARGE*PERIODIC RATE 84 0000 | 0000000000 87.93 |
| 3/28 | | | Balance Transfer - Charged To Offer 8 PURCHASES*FINANCE CHARGE*PERIODIC RATE 84 0000 | 0000000000 29.00 |
| 3/28 | | | Balance Transfer - Charged To Offer 11 PURCHASES*FINANCE CHARGE*PERIODIC RATE 84 0000 | 0000000000 28.84 |

Your late fee was based on your account balance
 as of the payment due date (03/21/05), which was
 \$6,527.83.

Help is available! 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.
 Please give us the opportunity to assist you.

| Account Summary | Previous Balance | (+) Purchases & Advances | (-) Payments & Credits | (+) FINANCE CHARGE | (=) New Balance |
|-----------------|------------------|--------------------------|------------------------|--------------------|-----------------|
| PURCHASES | \$6,527.83 | \$39.00 | \$0.00 | \$172.38 | \$6,739.21 |
| ADVANCES | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| TOTAL | \$6,527.83 | \$39.00 | \$0.00 | \$172.38 | \$6,739.21 |

Days This Billing Period: 32

| Rate Summary | Balance Subject to Finance Charge | Periodic Rate | Nominal APR | ANNUAL PERCENTAGE RATE |
|----------------|-----------------------------------|---------------|-------------|------------------------|
| PURCHASES | | | | |
| Standard Purch | \$242.11 | 0.08148%(D) | 29.740% | 29.740% |
| Offer 5 | \$778.50 | 0.08148%(D) | 29.740% | 29.740% |
| Offer 6 | \$3,372.26 | 0.08148%(D) | 29.740% | 29.740% |
| Offer 8 | \$1,112.16 | 0.08148%(D) | 29.740% | 29.740% |
| Offer 11 | \$1,105.91 | 0.08148%(D) | 29.740% | 29.740% |
| ADVANCES | | | | |
| Standard Adv | \$0.00 | 0.08148%(D) | 29.740% | 29.740% |

EXHIBIT A

C-6758

Verification

I, Courtney Gilbert 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: 6/17/05

Signature: Courtney Gilbert

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 1 of 1 Services

Sheriff Docket # **100765**

CITIBANK SOUTH DAKOTA, N.A.

Case # **05-1310-CD**

vs.

DARREN L. SKAGGS

TYPE OF SERVICE COMPLAINT

SHERIFF RETURNS

NOW December 27, 2005 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT "NOT FOUND" AS TO DARREN L. SKAGGS, DEFENDANT. ATTEMPTED NOT HOME.

SERVED BY: /

FILED
013:30 PM
DEC 27 2005
William A. Shaw
Prothonotary/Clerk of Courts

Return Costs

| PURPOSE | VENDOR | CHECK # | AMOUNT |
|-----------------|--------|---------|--------|
| SURCHARGE | NEIL | 13420 | 10.00 |
| SHERIFF HAWKINS | NEIL | 13419 | 50.86 |

Sworn to Before me This

So Answers,

____ Day of _____ 2005

*Chester A. Hawkins
by Marilyn Harris*
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.
701 East 60th Street North, Sioux Falls, SD
Plaintiff
v.

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

: NO. 2005-1310-C0

DARREN L SKAGGS
314 S Church Street, Du Bois PA 15801-1961
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.

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**LAWYER REFERENCE AND
INFORMATION SERVICE**

David S. Meholic
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
Telephone No. 814-765-2641 Ext. 5982

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

AUG 26 2005

Attest.

William B. Brown
Prothonotary/
Clerk of Courts

C-6758



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.

DARREN L SKAGGS

314 S Church Street, Du Bois PA 15801-1961

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 Darren L Skaggs, who resides at 314 S Church Street, Du Bois, Clearfield County, Pennsylvania.
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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.

C-6758

Verification

I, Courtney Gilbert 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: 6/17/05

Signature: Courtney Gilbert

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 N, Sioux Falls, SD
Plaintiff

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

VS.

DARREN L SKAGGS
314 S Church Street, Du Bois PA 15801-1961
Defendant

: NO. 2005-1310-CD
: CIVIL ACTION - LAW

Praecept to Reinstate

To the Prothonotary:

Please reinstate the Complaint.

BURTON NEIL & ASSOCIATES, P.C.

BY: 

Burton Neil, Esquire
Attorney for Plaintiff

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

C-6758

FILED Atty pd.
M 13:44 PM 7-00
JAN 23 2006

William A. Shaw
Prothonotary/Clerk of Courts

1 Compl. Reinstated
to Shff

(GK)



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101194
NO: 05-1310-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: CITIBANK SOUTH DAKOTA, N.A.
vs.
DEFENDANT: DARREN L. SKAGGS

SHERIFF RETURN

NOW, February 07, 2006 AT 2:24 PM SERVED THE WITHIN COMPLAINT ON DARREN L. SKAGGS DEFENDANT AT 314 S. CHURCH ST., DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO KRISTINE SKAGGS, WIFE A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DEHAVEN /

FILED
0190931
APR 10 2006
WM
William A. Shaw
Prothonotary/Clerk of Courts

| PURPOSE | VENDOR | CHECK # | AMOUNT |
|-----------------|--------|---------|--------|
| SURCHARGE | NEIL | 18496 | 10.00 |
| SHERIFF HAWKINS | NEIL | 18496 | 42.82 |

Sworn to Before Me This

____ Day of _____ 2006

So Answers,

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

CITIBANK SOUTH DAKOTA N.A.
701 East 60th Street N, Sioux Falls, SD 57117
Plaintiff

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

VS.

DARREN L SKAGGS
314 S Church Street
Du Bois PA 15801-1961

Defendant : CIVIL ACTION - LAW

: NO. 2005-1310-CD

Praeclipe for Default Judgment

To the Prothonotary:

Please enter judgment by default for want of an answer in the above case in favor of the plaintiff and against the defendant, and assess damages as follows:

| | |
|--------------|-------------------|
| Principal: | \$6,739.21 |
| Credit: | -\$2,480.00 |
| TOTAL | \$4,259.21 |

Understanding that false statements herein made are subject to penalty under 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities, I verify that:

1. The above are the precise last-known addresses of the judgment debtor and creditor.
2. The annexed notice of intention to file this praecipe was mailed to all parties against whom judgment is to be entered and to their record attorneys, if any, after the default occurred, and at least ten days prior to the date of the filing of this praecipe.
3. Pursuant to Section 201(b)(1)(A) of the Servicemembers Civil Relief Act of 2003 (SCRA), the defendant is not in the military service of the United States based on information received from the defendant and/or the Department of Defense website.

**JUDGMENT BY DEFAULT ENTERED
AND DAMAGES ASSESSED AS ABOVE.
NOTICE GIVEN UNDER PA.R.CIV.P. 236**

William A. Shaw
Pro Prothonotary

BURTON NEIL & ASSOCIATES, P.C.

BY: William A. Shaw

Burton Neil, Esquire
Attorney for Plaintiff
I.D. #11348
1060 Andrew Drive, Suite 170
W. Chester, PA 19380

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

FILED
MAY 15 2006 C-6758
Amy pd 20.00
ICCR Notice to Def.
William A. Shaw
Prothonotary/Clerk of Courts Statement to Atty
(CR)



CITIBANK SOUTH DAKOTA N.A.

: IN THE COURT OF COMMON PLEAS

Plaintiff

: CLEARFIELD COUNTY, PENNSYLVANIA

vs.

: NO. 2005-1310-CD

DARREN L SKAGGS

Defendant

: CIVIL ACTION - LAW

Notice of Intention to File Praecipe for Default Judgment

TO: Darren L Skaggs
 314 S Church Street
 Du Bois PA 15801-1961

IMPORTANT NOTICE

You are in default because you have failed to enter a written appearance personally or by attorney and file in writing with the court your defenses or obligations to the claims set forth against you. Unless you act within ten (10) days from the date of this notice, a judgment may be entered against you without a hearing and you may lose your property or other important rights. You should take this notice to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the following office 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

DATE OF NOTICE: April 17, 2006

BURTON NEIL & ASSOCIATES, P.C.

By: _____

Burton Neil, Esquire
 Attorney for Plaintiff
 Identification No. 11348
 1060 Andrew Drive, Suite 170
 West Chester, PA 19380
 (610) 696-2120

In making this communication, we advise our office is a debt collector.



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.

DARREN L SKAGGS
Defendant

: IN THE COURT OF COMMON PLEAS
: CLEARFIELD COUNTY, PENNSYLVANIA
: NO. 2005-1310-CD
: CIVIL ACTION - LAW

RULE OF CIVIL PROCEDURE NO. 236 (REVISED)

Notice is given that a JUDGMENT in the above captioned matter has been entered against you on

May 15, 2006

Prothonotary

By: William Chan
Deputy

If you have any questions concerning the above, please contact:

Burton Neil, Esquire
Attorney for Party Filing
1060 Andrew Drive, Suite 170
West Chester, PA 19380
Phone: 610-696-2120

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

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA
STATEMENT OF JUDGMENT

Citibank (South Dakota) N.A.
Plaintiff(s)

No.: 2005-01310-CD

Real Debt: \$4,259.21

Atty's Comm: \$

Vs.

Costs: \$

Darren L. Skaggs
Defendant(s)

Int. From: \$

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: May 15, 2006

Expires: May 15, 2011

Certified from the record this 15th day of May, 2006.



William A. Shaw, Prothonotary

SIGN BELOW FOR SATISFACTION

Received on _____, _____, of defendant full satisfaction of this Judgment,
Debt, Interest and Costs and Prothonotary is authorized to enter Satisfaction on the same.

Plaintiff/Attorney