

05-1630-CD  
Citibank vs. Debora E. Schloder

Citibank vs. Debora E. Schloder  
2005-1630-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 10CSaff  
m 11:05 21 Attypd.  
OCT 21 2005 85.00  
William A. Shaw  
Prothonotary/Clerk of Courts

CITIBANK (SOUTH DAKOTA) NA : IN THE COURT OF COMMON PLEAS  
701 East 60th Street North, Sioux Falls, SD  
Plaintiff : CLEARFIELD COUNTY, PENNSYLVANIA  
v. : NO. 05-1630-CD  
DEBORA E SCHLODER : CIVIL ACTION - LAW  
RR4 Box 495, Du Bois PA 15801-9513  
Defendant

**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

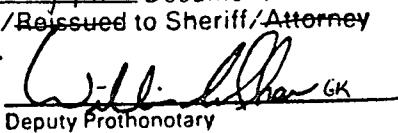
Clearfield County Courthouse

Clearfield, PA 16830

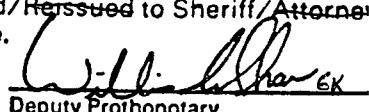
Telephone No. 814-765-2641 Ext. 5982

C-7475

February 6, 2006 Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.

  
Deputy Prothonotary

Feb 23, 2006 Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.

  
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) NA  
701 East 60th Street North, Sioux Falls, SD

Plaintiff

: IN THE COURT OF COMMON PLEAS

: CLEARFIELD COUNTY, PENNSYLVANIA

v.

: NO.

DEBORA E SCHLODER  
RR4 Box 495, Du Bois, PA  
Defendant

: CIVIL ACTION - LAW

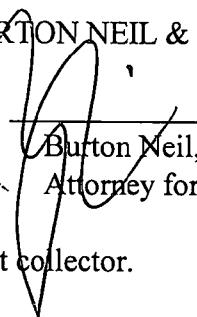
### **Complaint**

1. The plaintiff is Citibank (South Dakota) NA, with place of business located at 701 East 60th Street North, Sioux Falls, South Dakota.
2. The defendant is Debora E Schloder, who resides at RR4 Box 495, 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(n) AT&T Universal credit card with account number 5396478000519404 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 \$8,891.04.

Wherefore, plaintiff demands judgment against defendant for the sum of \$8,891.04, 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.

# Your AT&T Universal Card Statement

June 3 - July 5, 2005



# AT&T Universal Card

Page 1 of 4

DEBORA E SCHLODER  
Account 5396 4780 0051 9404  
Calling Card 8370663850 + PIN

## How To Reach Us

Visit: [www.universalcard.com](http://www.universalcard.com)  
Customer Service: 1 800 423-4343 or write  
Cardmember Services, PO Box 44167  
Jacksonville, FL 32231-4167

## Quick Reference

Minimum Payment Due..... \$879.32  
Due Date\*..... August 1, 2005  
\*Payment must be received by 1:00 pm local time on the payment due date.  
Amount Past Due..... \$603.73  
Credit Line..... \$22,900.00  
Available Credit..... \$14,008.00  
Cash Advance Limit..... \$8,000.00  
Available Cash Advance Limit..... \$8,000.00

Your late fee was based on your account balance as of the payment due date (06/29/05), which was \$8,620.45.

Your account is seriously past due and your credit privileges have been suspended. Please call the toll-free number shown above to learn about our special payment options.

## Account Summary

Previous Balance	8,620.45
Payments and Adjustments	0.00
MasterCard® Activity	270.59
Total AT&T Services	0.00
New Balance	\$8,891.04

Note: Detailed activity starts on page 3.

## Rewards

### ThankYou Redemptions Network

Total ThankYou Points..... 275

Log on to our website at [www.thankyouredemptions.com](http://www.thankyouredemptions.com) where rewarding yourself has never been easier. You can review your ThankYou Points balance, browse our redemption collection, and even redeem online!

date paid      amount paid      check #

Please follow payment instructions outlined in the "Important Instructions for Making Payments" section of the statement.

05396478000519404889104879325912

Your Account Number

5396 4780 0051 9404

Please Enter Amount of Payment Enclosed

\$

Payment Due Date  
AUG 01 2005

Your Total Balance  
\$8891.04

Minimum Amount Due  
\$879.32

636S PM 00 A 1 AR7051049

DEBORA E SCHLODER  
RR 4 BOX 495  
DU BOIS PA 15801-9513

AT&T UNIVERSAL CARD  
PO BOX 183052  
COLUMBUS, OH 43218-3052



EXHIBIT

A

DEBORA E SCHLODER  
Account 5396 4780 0051 9404  
June 3 - July 5, 2005



AT&T Universal Card

Page 2 of 4

**In the return envelope, please:**

- 1 Make your check payable to AT&T Universal Card.**
- 2 Enclose your check or money order. Include your account number and name on the front of your check or money order. Please, no cash or foreign currency.**
- 3 Enclose your payment coupon. Do not staple or tape it to your payment. Insert the payment coupon so that the entire AT&T Universal Card address appears through the window of your remittance envelope.**

DEBORA E SCHLÖDER  
Account 5396 4780 0051 9404  
June 3 - July 5, 2005



Page 3 of 4

## AT&T UNIVERSAL MASTERCARD ACTIVITY

Purchases.....	231.59
Cash Advances and Checks.....	0.00
Fees.....	39.00
<b>Total MasterCard Activity.....</b>	<b>\$270.59</b>

### PURCHASES

**Total MasterCard Purchases..... \$231.59**

#### Standard Purch

Trans	Post	Description	Amount
	07/05	PURCHASES*FINANCE CHARGE*PERIOD	122.48
<b>Total Standard Purch</b>			<b>\$122.48</b>

#### Balance Transfer - Charged To Offer 5

Trans	Post	Description	Amount
	07/05	PURCHASES*FINANCE CHARGE*PERIOD	20.43
<b>Total Balance Transfer - Charged To Offer 5</b>			<b>\$20.43</b>

#### Balance Transfer - Charged To Offer 7

Trans	Post	Description	Amount
	07/05	PURCHASES*FINANCE CHARGE*PERIOD	88.68
<b>Total Balance Transfer - Charged To Offer 7</b>			<b>\$88.68</b>

### CASH ADVANCES

Cash Advance Limit..... \$8,000.00\* \*This represents a portion of your total credit line.

### FINANCE CHARGE INFORMATION

	Nominal APR	Periodic Rate	Days in Billing Period	x	Balance Subject to Finance Charge	=	Periodic FINANCE CHARGE	+ Fee/ FINANCE CHARGE	ANNUAL PERCENTAGE RATE	
<b>PURCHASES</b>										
Standard Purch	30.250%	.08288%(D)	x	32	x	\$4,618.21	= \$122.48	+	\$0.00	30.250%
Offer 5	30.250%	.08288%(D)	x	32	x	\$770.33	= \$20.43	+	\$0.00	30.250%
Offer 7	30.250%	.08288%(D)	x	32	x	\$3,343.58	= \$88.68	+	\$0.00	30.250%
<b>CASH ADVANCES</b>										
Standard Adv	30.250%	.08288%(D)	x	32	x	\$0.00	= \$0.00	+	\$0.00	30.250%
							Total FINANCE CHARGE	=	\$231.59	

### FEES

#### Standard Purch

Trans	Post	Description	Amount
	07/05	LATE FEE - JUN PAYMENT PAST DUE	39.00
<b>Total Fees</b>			<b>\$39.00</b>

### AT&T SERVICES SUMMARY

AT&T Universal Calling Card Calls..... \$0.00

DEBORA E SCHLÖDER  
Account 5398 4780 0051 9404  
June 3 - July 5, 2005



Page 4 of 4

## REWARDS

### \*\*\*\*ThankYou Points Summary\*\*\*\*

Previous Statement Point Total.....	275
Base Points Earned.....	0
Total Points Earned This Period.....	0
Total ThankYou Points Available.....	275
Lifetime ThankYou Points Earned.....	289

Bonus Points may take one to two billing cycles to appear on your statement. Please refer to the specific terms and conditions pertaining to the promotion for further details.

Don't forget! Your AT&T Universal Card is the card that rewards you for all of your everyday purchases. Why use a card that doesn't give something back? See our website, [www.thankyouredemptions.com](http://www.thankyouredemptions.com) or call 1-877-7-REDEEM for more information!

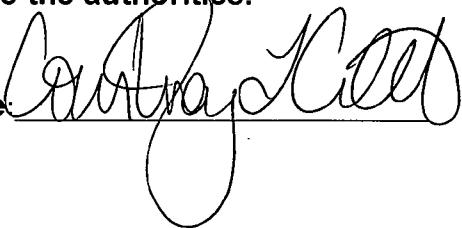
Verification

C-7475  
Schloder

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: 8/4/05

Signature:



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) NA  
701 East 60<sup>th</sup> Street N, Sioux Falls SD 57117  
Plaintiff

VS.

DEBORA E SCHLODER  
RR4 Box 495, Du Bois PA 15801-9513  
Defendant

: IN THE COURT OF COMMON PLEAS  
: CLEARFIELD COUNTY, PENNSYLVANIA  
: NO. 05-1630-CD  
: CIVIL ACTION - LAW

**Praecipe 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.

FILED NO CC  
m 12:05 PM  
FEB 06 2006 Atty pd. 7.00

William A. Shaw  
Prothonotary/Clerk of Courts

1 Compl. reinstated  
to Shiff

GK

C-7475



**In The Court of Common Pleas of Clearfield County, Pennsylvania**

Service # 1 of 1 Services

**Sheriff Docket # 100927**

**CITIBANK (SOUTH DAKOTA) NA**

**Case # 05-1630-CD**

vs.

**DEBORA E. SCHLODER**

**TYPE OF SERVICE COMPLAINT**

**SHERIFF RETURNS**

NOW February 07, 2006 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT "NOT FOUND" AS TO DEBORA E. SCHLODER, DEFENDANT. ATTEMPTED, NOT HOME.

SERVED BY: /

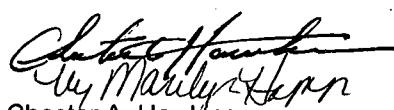
**Return Costs**

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	NEIL	14996	10.00
SHERIFF HAWKINS	NEIL	14995	46.23

Sworn to Before me This

\_\_\_\_ Day of \_\_\_\_\_ 2006

So Answers,

  
Chester A. Hawkins  
Sheriff

**FILED**  
09:54 AM  
FEB 08 2006

William A. Shaw  
Prothonotary/Clerk of Courts

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

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

OCT 21 2005

Attest.

*W. B. Ober*  
Prothonotary/  
Clerk of Courts

CITIBANK (SOUTH DAKOTA) NA  
701 East 60th Street North, Sioux Falls, SD  
Plaintiff

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

v.

: NO. 05-1630-CD

DEBORA E SCHLODER  
RR4 Box 495, Du Bois PA 15801-9513  
Defendant

: CIVIL ACTION - LAW

**COMPLAINT  
NOTICE**

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**LAWYER REFERENCE AND  
INFORMATION SERVICE**

David S. Meholick

Court Administrator

Clearfield County Courthouse

Clearfield, PA 16830

Telephone No. 814-765-2641 Ext. 5982

C-7475



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) NA

701 East 60th Street North, Sioux Falls, SD

Plaintiff

: IN THE COURT OF COMMON PLEAS

: CLEARFIELD COUNTY, PENNSYLVANIA

v.

: NO.

DEBORA E SCHLODER

RR4 Box 495, Du Bois, PA

Defendant

: CIVIL ACTION - LAW

### **Complaint**

1. The plaintiff is Citibank (South Dakota) NA, with place of business located at 701 East 60th Street North, Sioux Falls, South Dakota.

2. The defendant is Debora E Schloder, who resides at RR4 Box 495, 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(n) AT&T Universal credit card with account number 5396478000519404 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 \$8,891.04.

Wherefore, plaintiff demands judgment against defendant for the sum of \$8,891.04, 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.

THE SIGNATURE ABOVE CERTIFIES THAT THIS IS A  
TRUE AND CORRECT COPY OF THE ORIGINAL FILE IN THIS CAUSE.

# Your AT&T Universal Card Statement

June 3 - July 5, 2005



# AT&T Universal Card

Page 1 of 4

DEBORA E SCHLODER  
Account 5396 4780 0051 9404  
Calling Card 8370663850 + PIN

## How To Reach Us

Visit: [www.universalcard.com](http://www.universalcard.com)  
Customer Service: 1 800 423-4343 or write  
Cardmember Services, PO Box 44167  
Jacksonville, FL 32231-4167

## Quick Reference

Minimum Payment Due..... \$879.32  
Due Date\*..... August 1, 2005

\*Payment must be received by 1:00 pm local time on the payment due date.

Amount Past Due..... \$603.73

Credit Line..... \$22,900.00  
Available Credit..... \$14,008.00  
Cash Advance Limit..... \$8,000.00  
Available Cash Advance Limit..... \$8,000.00

## Account Summary

Previous Balance	8,620.45
Payments and Adjustments	0.00
MasterCard® Activity	270.59
Total AT&T Services	0.00
New Balance	<b>\$8,891.04</b>

Note: Detailed activity starts on page 3.

Your late fee was based on your account balance as of the payment due date (06/29/05), which was \$8,620.45.

Your account is seriously past due and your credit privileges have been suspended. Please call the toll-free number shown above to learn about our special payment options.

## Rewards

### ThankYou Redemptions Network

Total ThankYou Points..... 275

Log on to our website at [www.thankyouredemptions.com](http://www.thankyouredemptions.com) where rewarding yourself has never been easier. You can review your ThankYou Points balance, browse our redemption collection, and even redeem online!

date paid      amount paid      check #

Please follow payment instructions outlined in the "Important Instructions for Making Payments" section of the statement.

05396478000519404889104879325912

Your Account Number

5396 4780 0051 9404

Please Enter Amount of Payment Enclosed

Payment Due Date	Your Total Balance	Minimum Amount Due	
AUG 01 2005	\$8891.04	\$879.32	\$

6365 PM 00 A 1 AR7051049

DEBORA E SCHLODER  
RR 4 BOX 495  
DU BOIS PA 15801-9513

AT&T UNIVERSAL CARD  
PO BOX 183052  
COLUMBUS, OH 43218-3052

EXHIBIT

A

DEBORA E SCHLÖDER  
Account 5396 4780 0051 9404  
June 3 - July 5, 2005



Page 2 of 4

**In the return envelope, please:**

- 1 Make your check payable to AT&T Universal Card.**
- 2 Enclose your check or money order. Include your account number and name on the front of your check or money order. Please, no cash or foreign currency.**
- 3 Enclose your payment coupon. Do not staple or tape it to your payment. Insert the payment coupon so that the entire AT&T Universal Card address appears through the window of your remittance envelope.**

DEBORA E SCHLODER  
Account 5396 4780 0051 9404  
June 3 - July 5, 2005



Page 3 of 4

## AT&T UNIVERSAL MASTERCARD ACTIVITY

Purchases.....	231.59
Cash Advances and Checks.....	0.00
Fees.....	39.00
<b>Total MasterCard Activity.....</b>	<b>\$270.59</b>

### PURCHASES

**Total MasterCard Purchases..... \$231.59**

#### Standard Purch

Trans	Post	Description	Amount
	07/05	PURCHASES*FINANCE CHARGE*PERIOD	122.48
<b>Total Standard Purch</b>			<b>\$122.48</b>

#### Balance Transfer - Charged To Offer 5

Trans	Post	Description	Amount
	07/05	PURCHASES*FINANCE CHARGE*PERIOD	20.43
<b>Total Balance Transfer - Charged To Offer 5</b>			<b>\$20.43</b>

#### Balance Transfer - Charged To Offer 7

Trans	Post	Description	Amount
	07/05	PURCHASES*FINANCE CHARGE*PERIOD	88.68
<b>Total Balance Transfer - Charged To Offer 7</b>			<b>\$88.68</b>

### CASH ADVANCES

Cash Advance Limit..... \$8,000.00\* \*This represents a portion of your total credit line.

### FINANCE CHARGE INFORMATION

	Nominal APR	Periodic Rate	x Days in Billing Period	x Balance Subject to Finance Charge	=	Periodic FINANCE CHARGE	+ Transaction Fee/ FINANCE CHARGE	ANNUAL PERCENTAGE RATE
<b>PURCHASES</b>								
Standard Purch	30.250%	.08288%(D)	x 32	x \$4,618.21	=	\$122.48	+	\$0.00
Offer 5	30.250%	.08288%(D)	x 32	x \$770.33	=	\$20.43	+	\$0.00
Offer 7	30.250%	.08288%(D)	x 32	x \$3,343.58	=	\$88.68	+	\$0.00
<b>CASH ADVANCES</b>								
Standard Adv	30.250%	.08288%(D)	x 32	x \$0.00	=	\$0.00	+	\$0.00
Total FINANCE CHARGE =								<b>\$231.59</b>

### FEES

#### Standard Purch

Trans	Post	Description	Amount
	07/05	LATE FEE - JUN PAYMENT PAST DUE	39.00
<b>Total Fees</b>			<b>\$39.00</b>

### AT&T SERVICES SUMMARY

AT&T Universal Calling Card Calls..... \$0.00

DEBORA E SCHLODER  
Account 5396 4780 0051 9404  
June 3 - July 5, 2005



Page 4 of 4

## REWARDS

### \*\*\*\*ThankYou Points Summary\*\*\*\*

Previous Statement Point Total.....	275
Base Points Earned.....	0
Total Points Earned This Period.....	0
Total ThankYou Points Available.....	275
Lifetime ThankYou Points Earned.....	289

Bonus Points may take one to two billing cycles to appear on your statement. Please refer to the specific terms and conditions pertaining to the promotion for further details.

Don't forget! Your AT&T Universal Card is the card that rewards you for all of your everyday purchases. Why use a card that doesn't give something back? See our website, [www.thankyouredemptions.com](http://www.thankyouredemptions.com) or call 1-877-7-REDEEM for more information!

Verification

C-7475  
Schloder

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: 8/4/05

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) NA  
701 East 60<sup>th</sup> Street N, Sioux Falls SD 57117  
Plaintiff

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

VS.

DEBORA E SCHLODER  
78 Pine View, Du Bois PA 15801-4640  
Defendant

: NO. 05-1630-CD  
: CIVIL ACTION - LAW

**Praecipe 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.

FILED, Atty pd. 7.00  
m 10:22 AM  
FEB 23 2006 i Reinstate  
Compl. to Sheriff

William A. Shaw  
Prothonotary/Clerk of Courts (6K)

C-7475



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101236  
NO: 05-1630-CD  
SERVICE # 1 OF 1  
COMPLAINT

PLAINTIFF: CITIBANK (SOUTH DAKOTA) NA  
vs.  
DEFENDANT: DEBORA E. SCHLODER

**SHERIFF RETURN**

NOW, February 09, 2006 AT 2:40 PM SERVED THE WITHIN COMPLAINT ON DEBORA E. SCHLODER DEFENDANT AT 78 PINE VW, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO CLARENCE SCHLODER, HUSBAND A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DEHAVEN / COUDRIET

**FILED**  
01/09/09  
APR 10 2006  
JS

William A. Shaw  
Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	NEIL	19136	10.00
SHERIFF HAWKINS	NEIL	19136	43.21

Sworn to Before Me This

\_\_\_\_ Day of \_\_\_\_\_ 2006

So Answers,

*Chester A. Hawkins  
by Marley Hauer*  
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:

DEBORA E SCHLODER  
78 Pine View  
Du Bois PA 15801-4640

Defendant : CIVIL ACTION - LAW

**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: \$8,891.04

TOTAL \$8,891.04

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: Edward J. O'Brien

Edward J. O'Brien, Esquire  
Attorney for Plaintiff  
I.D. #32985  
1060 Andrew Drive, Suite 170  
W. Chester, PA 19380

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

FILED *Atty pd. 20.00*  
*12:15 PM* MAY 22 2006 ICC Notice to  
Def.

C-7475

William A. Shaw *Statement to C.R. Atty*  
Prothonotary/Clerk of Courts



CITIBANK (SOUTH DAKOTA) N.A.

: IN THE COURT OF COMMON PLEAS

Plaintiff

: CLEARFIELD COUNTY, PENNSYLVANIA

vs.

: NO. 05-1630-CD

DEBORA E SCHLODER

Defendant

: CIVIL ACTION - LAW

**Notice of Intention to File Praecipe for Default Judgment**

TO: Debora E Schloder  
78 Pine View  
Du Bois PA 15801-4640

**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: May 2, 2006

BURTON NEIL &amp; 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: Edward J. O'Brien, Esquire  
Identification No. 32985  
1060 Andrew Drive, Suite 170  
West Chester, PA 19380  
610-696-2120  
ATTORNEY FOR: Plaintiff

CC.

CITIBANK (SOUTH DAKOTA) N.A.  
Plaintiff

VS.

DEBORA E SCHLODER  
Defendant

: IN THE COURT OF COMMON PLEAS  
: CLEARFIELD COUNTY, PENNSYLVANIA  
: NO. 05-1630-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 22, 2006.

Prothonotary

By: \_\_\_\_\_

Deputy



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

Edward J. O'Brien, 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.: 2005-01630-CD

Real Debt: \$8,891.04

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Debora E. Schloder  
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: May 22, 2006

Expires: May 22, 2011

Certified from the record this 22nd 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