

05-1833-CD

Discover Bank vs P. Angeletti et al

05-1833-CD
Discover Bank vs Philip Angeletti et al

ERIC M. BERMAN, P.C.

BY: Eric M. Berman, Esquire, I.D. 83698

BY: Robert M. Kline, Esquire, I.D. 56479

500 North Gulph Road, Suite 350

King of Prussia, PA 19406

(610) 265-7720

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COURT OF COMMON PLEAS
COUNTY OF CLEARFIELD

DISCOVER BANK

c/o ERIC M. BERMAN, P.C.

500 North Gulph Road, Suite 350

King of Prussia, PA 19406

vs.

: TRIAL DIVISION

: CIVIL ACTION

: ~~Term~~

:

PHILIP ANGELETTI

JANE K ANGELETTI

11 N 3RD ST

DU BOIS, PA 15801 3155

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FILED

No. 2005-1833-C NOV 23 2005
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William A. Shaw

Prothonotary/Clerk of Courts

NOTICE

You have been sued in court. If you wish to defend against ~~the court to~~ ^{20 days to} the claims set forth in the following pages, you must take action ^{5 days} within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing ~~1 case to~~ in writing with the court your defenses or objections to the claims ~~1 case to~~ set forth against you. You are warned that if you fail to do so the ~~case~~ ^{case} may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in this complaint or for any other claim or relief required 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 OR FIND OUT WHERE YOU CAN GET LEGAL HELP.

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plaza al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. A demas la corte puede decidir a favor del demandante y requiere que usted compla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATEMENTE. SI NO TIENE ABOGA O SO NO TIENE EL DINERO SUFFICIENTE 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.

LAWYER REFERRAL SERVICE, COUNTY OF CLEARFIELD BAR ASSOCIATION

Add.: P.O. BOX 186, HARRISBURG, PA 17108 Tel.: 800-692-7375

Our File No. 231430

ATTORNEYS FOR PLAINTIFF

ERIC M. BERMAN, P.C.

BY: Eric M. Berman, Esquire, I.D. 83698
BY: Robert M. Kline, Esquire, I.D. 56479
500 North Gulph Road, Suite 350
King of Prussia, PA 19406
(610) 265-7720

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DISCOVER BANK : COURT OF COMMON PLEAS
c/o ERIC M. BERMAN, P.C. : COUNTY OF CLEARFIELD
500 North Gulph Road, Suite 350 : CIVIL ACTION
King of Prussia, PA 19406 : Term _____
: No. .
vs. :
: .

PHILIP ANGELETTI
JANE K ANGELETTI
11 N 3RD ST
DU BOIS, PA 15801 3155

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COMPLAINT

1. Plaintiff, DISCOVER BANK ,
is a DELAWARE STATE BANK
authorized to do business in the Commonwealth of Pennsylvania with
its place of business at 3311 MILL MEADOW DRIVE, HILLIARD, OH 43026.

2. The Defendant(s), PHILIP ANGELETTI JANE K ANGELETTI ,
resides at 11 N 3RD ST , DU BOIS, PA 15801-3155.

3. There is due from the Defendant(s) the sum of \$6,057.08 for
credit extended by Plaintiff to Defendant(s), acct. no. 6011002404501256,
and which such credit was drawn and used by the Defendant(s).
Defendant(s) is in default for failure to make payments for such use.

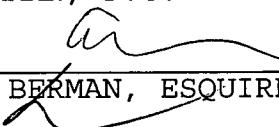
4. The Plaintiff has made demand upon the Defendant(s) for payment
of monies in the sum of \$6,057.08 advanced to Defendant(s) through
Defendant(s) use of the above-referenced credit account, but Defendant(s)
has failed and refused to pay the said sum or any part thereof.

5. All applicable credits, if any, have been duly applied to
Defendant(s) credit account.

WHEREFORE, Plaintiff claims of the Defendant(s) the sum of \$6,057.08
plus interest, attorneys fees and costs which are justly due and
owing from the Defendant(s) to the Plaintiff.

ERIC M. BERMAN, P.C.

BY:


ERIC M. BERMAN, ESQUIRE

BY:


ROBERT M. KLINE ESQUIRE

VERIFICATION

Eric M. Berman, Esquire, being duly sworn according to law, deposes and says that he is the Principal attorney of Eric M. Berman, P.C., attorneys for the Plaintiff, and/or Robert M. Kline, Esquire, being duly sworn according to law, deposes and says that he is an associate attorney with said firm, and as said attorney, is authorized to take this verification on its behalf, and that the facts in the Complaint as set forth therein are true and correct to the best of his knowledge, information and belief.

I verify that the statements made in the within instrument are true and correct. I understand that false statements are subject to the penalties of 18 Pa C.S.A. Section 4904 relating to unsworn falsifications to authorities.



ERIC M. BERMAN, ESQUIRE



ROBERT M. KLINE, ESQUIRE

Dated: OCTOBER 27, 2005

SPACEBNW-ZN

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101032
NO: 05-1833-CD
SERVICE # 1 OF 2
COMPLAINT

PLAINTIFF: DISCOVER BANK
vs.
DEFENDANT: PHILIP ANGELETTI and JANE K. ANGELETTI

SHERIFF RETURN

NOW, December 16, 2005 AT 11:40 AM SERVED THE WITHIN COMPLAINT ON PHILIP ANGELETTI DEFENDANT AT 11 N 3RD ST., DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO PHILIP ANGELETTI, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: COUDRIET / DEHAVEN

FILED
01/22/2006
MAR 02 2006
WAS
William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101032
NO: 05-1833-CD
SERVICE # 2 OF 2
COMPLAINT

PLAINTIFF: DISCOVER BANK
vs.
DEFENDANT: PHILIP ANGELETTI and JANE K. ANGELETTI

SHERIFF RETURN

NOW, December 16, 2005 AT 11:40 AM SERVED THE WITHIN COMPLAINT ON JANE K. ANGELETTI DEFENDANT AT 11 N 3RD ST., DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO PHILIP ANGELETTI, HUSBAND A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: COUDRIET / DEHAVEN

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101032
NO. 05-1833-CD
SERVICES 2
COMPLAINT

PLAINTIFF: DISCOVER BANK
vs.
DEFENDANT: PHILIP ANGELETTI and JANE K. ANGELETTI

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	BERMAN	24025	20.00
SHERIFF HAWKINS	BERMAN	24025	80.00

Sworn to Before Me This

____ Day of _____ 2006

So Answers,

Chester A. Hawkins
by Marilyn Harr
Chester A. Hawkins
Sheriff

Our File No. 231430
ERIC M. BERMAN, P.C.
By: Robert M. Kline, Esquire
Identification No. 56479
500 N. Gulph Road, Suite, 350
King of Prussia, PA 19406

Attorneys for Plaintiff

DISCOVER BANK :
c/o Eric M. Berman, P.C.
500 N. Gulph Road, Suite 335
King of Prussia, PA 19406 :
Vs. :
PHILLIP ANGELETTI :
JANE K ANGELETTI

COURT OF COMMON PLEAS
CLEARFIELD COUNTY
CIVIL ACTION

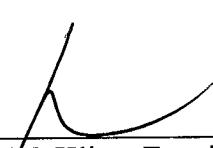
CASE NO.: 2005-1833

PRAECIPE TO SETTLE, DISCONTINUE AND END

TO THE PROTHONOTARY:

Please mark this action Settled, Discontinued and Ended.

Dated: December 2, 2008



Robert M. Kline, Esquire
Attorney for Plaintiff

FILED NO CC
MJD:SLB/BN
DEC 08 2008 GAC
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William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

COPY

CIVIL DIVISION

Disocver Bank

Vs. No. 2005-01833-CD
Philip Angeletti
Jane K. Angeletti

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 December 8, 2008, marked:

Settled, Discontinued and Ended

Record costs in the sum of \$85.00 have been paid in full by Eric M. Berman, P.C.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 8th day of December A.D. 2008.



William A. Shaw, Prothonotary