

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK,

Plaintiff

v.

LISA A. HAWKINS,

Defendant

)
) NO. 2005-1925-CV
)
)
)
)
)
)

**COMPLAINT IN CIVIL
ACTION**

Filed on behalf of:
Target National Bank,
Plaintiff

Counsel of Record for This
Party:

Gregg L. Morris, Esquire
Pa I.D. #69006

Patenaude & Felix, A.P.C.
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

tee

HAWKINS, LISA 2050.7076.wpd

FILED

DEC 12 2005

W.A. Shaw
William A. Shaw

Prothonotary/Clerk of Courts

1 cent to SHAN

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK,)
) NO.
Plaintiff)
)
v.)
)
LISA A. HAWKINS,)
)
Defendant)

NOTICE TO DEFEND

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 TWENTY (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 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 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, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. 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.

**David S. Meholick, Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
(814) 765-2641 Ext. 5982**

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK,)
) NO.
Plaintiff)
)
v.)
)
LISA A. HAWKINS,)
)
Defendant)

COMPLAINT IN CIVIL ACTION

AND NOW, comes Plaintiff, TARGET NATIONAL BANK, by and through its attorney, GREGG L. MORRIS, ESQUIRE and the law offices of PATENAUDE & FELIX, A.P.C. and files the following **Complaint in Civil Action**, and in support thereof aver as follows:

Count I
Account Stated

1. Plaintiff, TARGET NATIONAL BANK. is a corporation and for the purpose of this litigation, maintaining a place of business c/o Patenaude and Felix, A.P.C., 213 East Main Street, Carnegie, Pennsylvania 15106.

2. Defendant is Lisa A. Hawkins, an adult individual, believed to currently reside at 210 Cooper Avenue, Glen Hope, Pennsylvania 16645 and receive mail at P.O. Box 31, Glen Hope, Pennsylvania 16645.

3. Heretofore, the Defendant opened a Target National Bank account with Plaintiff being Account No. 4352373411443531, for the purchase of goods and services.

4. The Defendant has made or authorized a number of purchases and as of September 21, 2004, Defendant owes \$2,740.21 on said account plus interest.

5. Plaintiff maintains accurate books of account recording all credits and debits for this account.

6. The Defendant has received monthly billing statements from Plaintiff setting forth the nature and amount of all charges made by Defendant, and the transactions between Plaintiff and Defendant give rise to an account stated, upon which Plaintiff has relied.

7. The Defendant made payments, but has refused to pay, and now refuses to pay the balance due and owing on the aforesaid account in the sum of \$2,740.21, plus interest and costs.

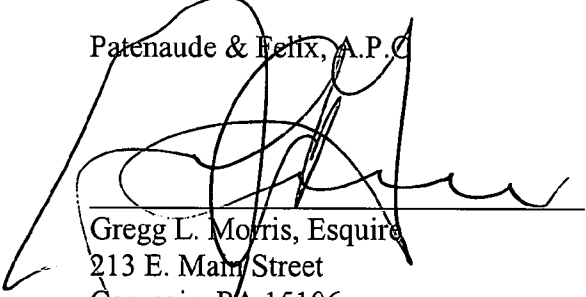
8. By failing to object or dispute to the statements including the statement attached hereto as Plaintiff's Exhibit "1", Defendant has assented to and agreed to the correctness of the balance due on the credit card account so as to constitute an account stated.

9. Despite repeated demands, Defendant has failed to make the required installment payments when due and therefore the full amount of the account is now due and payable.

WHEREFORE, Plaintiff demands Judgment in its favor, and against Defendant, in the amount of \$2,740.21, plus legal interest from the date of breach, with continuing interest at the legal rate thereon from the date of Judgment plus costs. The damages requested are less than the maximum amount for compulsory arbitration as set by the Court.

Respectfully Submitted:

Patenaude & Felix, A.P.C.



Gregg L. Morris, Esquire
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

Retailers National Bank
an affiliate of Target

Statement Closing Date: September 15, 2004
Page 1 of 2

2050.7076



Target.com

Account Number: 4352-3734-1144-3531
Lisa A Hawkins

Target Visa Account Summary

Total Credit Limit \$0
Cash Limit \$0
Available Credit \$0
Portion Available for Cash \$0
The Cash Limit is a portion of the Total Credit Limit

Previous Balance \$4,305.21
Payments & Credits 0.00
Purchases & Advances 0.00
Other Charges 35.00
FINANCE CHARGES 0.00
New Balance \$4,340.21

Questions? Call Us:

Target Credit Services 1-888-755-5856
TDD/TDY 1-800-347-5842
Outside the U.S. 11-612-307-8622 (Call Collect)
Calling will not preserve your billing-error rights

Amount Past Due \$733.00
Minimum Payment Due \$4,340.21
(includes any Amount Past Due)
Payment Due Date October 10, 2004

Important Messages

Retailers National Bank is now Target National Bank!

We've changed our name to better reflect our focus on Target cardholders like you. Only the name has changed, though--all of the great features of your Target Visa have stayed exactly the same.

Payments & Credits

No payments or credits were received last month.

Other Charges

Sep. 9 LATE PAYMENT FEE

\$35.00
Total Other Charges \$35.00

NOTICE: SEE REVERSE SIDE FOR IMPORTANT INFORMATION.

INCLUDE THIS PORTION WITH YOUR PAYMENT MADE PAYABLE TO TARGET NATIONAL BANK.

Target National Bank an affiliate of



NEW PHONE, HOME OR
E-MAIL ADDRESS?
PLEASE UPDATE ON REVERSE SIDE.

TARGET NATIONAL BANK
P.O. BOX 59317
MINNEAPOLIS, MN 55459-0317

Account Number 4352-3734-1144-3531
New Balance \$4,340.21
Minimum Payment Due \$4,340.21
Payment Due Date October 10, 2004

Amount
Enclosed

\$

OFFICE COPY

STATEMENT PAGE NOT PRINTED



LISA A HAWKINS
PO BOX 31
GLEN HOPE, PA 16645-0031



1001070434021043402190435237341144353171

Exhibit "1"



Target.com

Account Number: 4352-3734-1144-3531
Lisa A Hawkins

Finance Charges

Days In Billing Period: 31

Balance Type	Daily Periodic Rate	Corresponding Annual Percentage Rate	Average Daily Balance	Periodic FINANCE CHARGE	Transaction FINANCE CHARGE
Purchases	0.06821%	24.90%	\$0.00	\$0.00	\$0.00
Cash	0.06821%	24.90%	\$0.00	\$0.00	\$0.00

Total FINANCE CHARGES: \$0.00
Actual ANNUAL PERCENTAGE RATE: 0.00%

Target Rewards Status

Use your Target Visa every time and everywhere you shop and you'll soon earn big savings! Each time you accumulate 1000 points by shopping with your Target Visa, you earn a Target Rewards certificate good for 10%* savings on one full day of Target Store purchases charged on your Target Visa. You currently have 920 Rewards points and need only 80 additional points to earn your next Target Rewards certificate.

Previous Rewards Points Balance	920
Earned This Month	+ 0
New Balance	920

*Subject to Rewards Program rules. Limit one Target Rewards certificate per billing period; excess points carry forward to next billing period. Expiration date applies to Target Rewards certificate.

Use your Target Visa and Reap the Rewards

Remember to use your Target Visa whenever you shop at Target or everywhere else Visa credit cards are accepted. You'll see how rewarding it can be.

As a valued Target Visa cardholder, you'll always be the first to know.

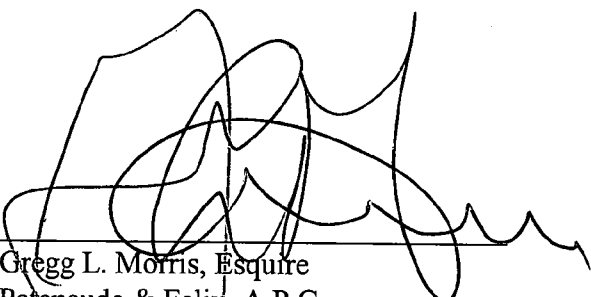
Like to get the scoop on exclusive promotions, savings and updates? Simply write your e-mail address on the back of this bill and mail it in with your payment. Whenever we've got something new to share, you'll be the first to hear about it.

VERIFICATION

AND NOW, Gregg L. Morris, verifies the statements made in this Complaint that are true and correct to the best of his knowledge, information and belief. I understand that false statements herein are made subject to the penalties of Pa.C.S. Section 4904, relating to unsworn falsification to authorities.

By virtue of the fact that the Plaintiff is outside the jurisdiction of the Court and the verification cannot be obtained within the time allowed for the filing of this pleading, the pleading is submitted by counsel having sufficient knowledge, information and belief based upon the information provided to him by the Plaintiff. The verification of the party will be provided if requested.

Date: 12/9/05



Gregg L. Morris, Esquire
Patenaude & Felix, A.P.C
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK,

Plaintiff

v.

LISA A. HAWKINS,

Defendant

)
) NO. 2005-1925-CD
)
)
)
)
)
)
)

**PRAECIPE TO SETTLE
AND DISCONTINUE
WITH PREJUDICE**

Filed on behalf of
Target National Bank,
Plaintiff

Counsel of Record for This
Party:

Gregg L. Morris, Esquire
Pa I.D. #69006

Patenaude & Felix, A.P.C.
213 E. Main Street
Carnegie, PA 15106
(412)429-7675

HAWKINS, LISA 2050.7076.wpd

FILED

m/11:43 am
JAN 11 2006

NoCC

Cent of disc to
Atty Morris

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK,

Plaintiff

v.

LISA A. HAWKINS,

Defendant

)
) NO. 2005-1925-CD
)
)
)
)
)
)
)

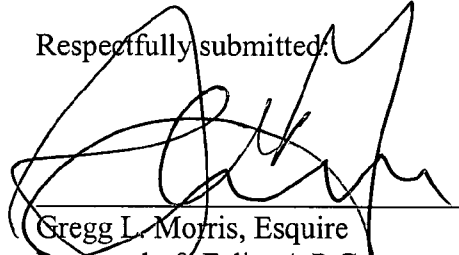
PRAECIPE TO SETTLE AND DISCONTINUE WITH PREJUDICE

TO: Prothonotary

Please settle and discontinue the matter captioned above with prejudice. Thank you.

Respectfully submitted:

Date: 1/9/06



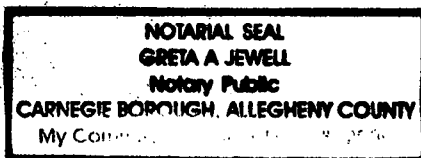
Gregg L. Morris, Esquire
Patehaude & Felix, A.P.C
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

Sworn to and subscribed before me

this 9th day of January 2006,



Notary Public

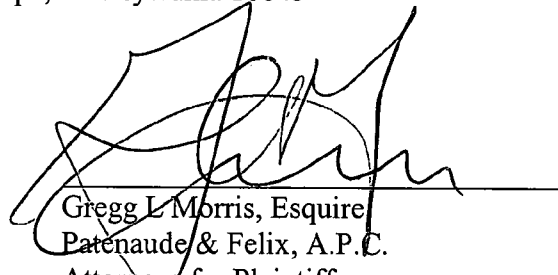


I, Gregg L Morris, attorney for Plaintiff, Target National Bank, hereby certify that a true and correct copy of the foregoing document was served this date by US First Class Mail, postage prepaid upon the following:

Lisa A. Hawkins
210 Cooper Avenue
Glen Hope, Pennsylvania 16645

Date: _____

1/9/06

A large, stylized handwritten signature in black ink, likely belonging to Gregg L. Morris, is written over a horizontal line.

Gregg L Morris, Esquire
Paternaude & Felix, A.P.C.
Attorneys for Plaintiff
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

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

CIVIL DIVISION

COPY

Target National Bank

Vs.

No. 2005-01925-CD

Lisa A. Hawkins

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 January 11, 2006, marked:

Settled and Discontinued, with prejudice

Record costs in the sum of \$85.00 have been paid in full by Patenaude & Felix.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 11th day of January A.D. 2006.

William A. Shaw, Prothonotary

☐ 4545 MURPHY CANYON ROAD, THIRD FLOOR
SAN DIEGO, CA 92123
TEL (858) 244-7600 (800) 832-7675
FAX (858) 836-0318

☒ 213 EAST MAIN STREET
CARNEGIE, PA 15106
TEL (412) 429-7675 (866) 772-7675
FAX (412) 429-7679

☐ 1771 EAST FLAMINGO ROAD, SUITE 112A
LAS VEGAS, NV 89119
TEL (702) 952-2031 (800) 867-3092
FAX (702) 992-6286

January 9, 2006

Prothonotary, Clearfield County
P. O. Box 549
Clearfield, PA 16830

Re: Target National Bank v. Lisa A. Hawkins
Docket Number: 2005-1925-CD
Our File Number: 2050.7076

To Whom It May Concern:

Enclosed you will find a Praecipe to Settle and Discontinue for filing in the above captioned matter. Once the original has been filed, please return a time-stamped copy of the face sheet to my office in the enclosed, self-addressed, stamped envelope. Your cooperation in doing so is greatly appreciated.

Thank you in advance for your anticipated cooperation in this matter.

Sincerely yours,


Gregg L. Morris, Esquire

GLM/enb
Enclosure

cc: Lisa A. Hawkins w/enclosure

THIS COMMUNICATION IS FROM A DEBT COLLECTOR.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101076
NO: 05-1925-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: TARGET NATIONAL BANK
vs.
DEFENDANT: LISA A. HAWKINS

SHERIFF RETURN

NOW, December 21, 2005 AT 1:10 PM SERVED THE WITHIN COMPLAINT ON LISA A. HAWKINS DEFENDANT AT SHERIFF'S OFFICE, 1 N. 2ND ST., SUITE 116, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO JAMES HAWKINS, HUSBAND A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DEHAVEN /

FILED
02:57 PM
MAR 07 2006
William A. Shaw
Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	PATENAUE	5693	10.00
SHERIFF HAWKINS	PATENADUE	5693	20.00

Sworn to Before Me This

_____ Day of _____ 2006

So Answers,

Chester A. Hawkins
by *Maury Harris*
Chester A. Hawkins
Sheriff