

06-341-CD
HSBC Bank Nevada vs Alfred

HSBS Bank vs Alfred Simmers
2006-341-CD

**COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA**

HSBC BANK NEVADA, N.A.
(Plaintiff)

CIVIL ACTION

C/O WOLPOFF & ABRAMSON, L.L.P.
4660 TRINDLE ROAD, 3rd FLOOR
CAMP HILL, PA 17011

2006-341-CD

Type of Case: Contract

VS.

Type of Pleading: COMPLAINT

Filed on Behalf of: Plaintiff

ALFRED P. SIMMERS

(Defendant)

4458 BEVERLY BOULEVARD
COALPORT, PA 16627

Andrew C. Spears, Esquire #87737
Wolpoff & Abramson, LLP/Counsel for Plaintiff
Attorney's in the Practice of Debt Collection
4660 Trindle Road, Third Floor
Camp Hill, PA 17011
(717) 303-6700


(Signature)

FILED
MAR 03 2006
W/4:00 PM
William A. Shaw
Prothonotary Clerk of Courts
1 CENT TO SHFR
1 CENT TO ATTY

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HSBC BANK NEVADA, N.A.
Plaintiff

NO. 2006-341-CV

vs.

CIVIL ACTION - LAW

ALFRED P. SIMMERS
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 is 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.

Lawyer Referral Service
Pennsylvania Bar Association
P.O. Box 186
Harrisburg, Pa 17108
(800) 692-7375

LAW OFFICES
WOLPOFF & ABRAMSON, L.L.P.
ATTORNEYS IN THE PRACTICE
OF DEBT COLLECTION
4660 TRINDE ROAD
THIRD FLOOR
CAMP HILL, PA 17011
717-303-6700

MAR 03 2006

William A. Shaw
Prothonotary Clerk of Court

EN LA CORTE DE ALEGATOS COMUN DEL CONDADO DE CLEARFIELD ,
PENNSYLVANIA

HSBC BANK NEVADA, N.A.

Plaintiff

NO.

vs.

CIVIL ACTION – LAW

ALFRED P. SIMMERS
Defendant

NOTICIA

USTED HA SIDO DEMANDADO/A EN LA CORTE. Si usted desea defender conta la demanda puestas en las siguientes paginas, usted tienen que tomar acción dentro veinte (20) dias después que esta Demanda y Aviso es servido, con entrando por escrito una apariencia personalmente o por un abogado y archivando por escrito con la Corte sus defensas o objeciones a las demandas puestas en esta contra usted. Usted es advertido que si falla de hacerlo el caso puede proceder sin usted y un juzgamiento puede ser entrado conta usted por la Corte sin mas aviso por cualquier dinero reclamado en la Demanda o por cualquier otro reclamo o alivio solicitado por Demandante. Usted puede perder dinero o propiedad o otros derechos importante para usted.

USTED DEBE LLEVAR ESTE PAPEL A SU ABOGADO ENSEGUIDA. SI USTED NO TIENE UN ABOGADO, VAYA O LLAME POR TELEFONO LA OFICINA FIJADA AQUI ABAJO. ESTA OFICINA PUEDE PROVEERE CON INFORMACION DE COMO CONSEGUIR UN ABOGADO.

SI USTED NO PUEDE PAGARLE A UN ABOGADO, ESTA OFICINA PUEDE PROVEERE INFORMACION ACERCA AGENCIAS. QUE PUEDAN OFRECER SERVICIOS LEGAL A PERSONAS ELIGIBLE A UN HONORARIO REDUCIDO O GRATIS.

SERVICIO DE REFERIDO A ABOGADO
COLEGIO DE ABOGADOS DEL CONDADO DE LEHIGH
ABOGACIA DEL CONDADO DE CLEARFIELD

Pennsylvania Bar Association
P.O. Box 186
Harrisburg, Pa 17108
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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

HSBC BANK NEVADA, N.A.

Plaintiff

NO.

vs.

CIVIL ACTION – LAW

ALFRED P. SIMMERS
Defendant

COMPLAINT

AND NOW, TO WIT, comes the Petitioner/Plaintiff, HSBC BANK NEVADA, N.A., by and through its attorneys, and the law firm of Wolpoff & Abramson, LLP, and hereby avers as follows:

1. Plaintiff, HSBC BANK NEVADA, N.A., is a corporation doing business within the Commonwealth of Pennsylvania, and the other states of the United States, with its principal place of business situated at 1111 TOWN CENTER DRIVE, LAS VEGAS, NV 89134.
2. Defendant, ALFRED P. SJMMERS, is an adult individual with a last known address of 4458 BEVERLY BOULEVARD, CLEARFIELD County, COALPORT, PA 16627.
3. It is averred that Defendant was issued an open ended credit account by Plaintiff (hereinafter “Account”).
4. Defendant, by using the Account, agreed to pay Plaintiff for all charges made to the Account.
5. At all relevant times material hereto, Defendant has been a regular user of said Account for the purchase of products, goods and/or for obtaining services and/or funds.
6. Defendant has been provided with copies of statements accurately showing all debits and credits for transactions on the aforementioned Account.
7. Defendant did not object to the above-mentioned statements submitted by Plaintiff and/or its assignors to Defendant. True and correct copies of the monthly

statements are attached herein as Exhibit "A" and incorporated by reference as if set forth in full below.

8. As of the date of filing the within Complaint, the principal due and payable by Defendant to Plaintiff as a result of charges made by said Defendant and/or any authorized users is the sum of One Thousand Nine Hundred Nine Dollars and Sixty-Six Cents, (\$1,909.66).

9. The amount of pre-judgment interest which has accrued from the charge off date is the sum of Four Hundred Thirty-Five Dollars and Nine Cents, (\$435.09).

10. Despite reasonable and repeated demands for payment, Defendant has failed, refused and continues to refuse to pay all sums due and owing on the aforementioned Account to the detriment of Plaintiff.

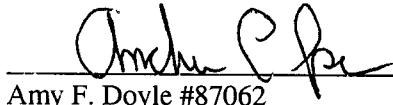
11. Plaintiff has retained the services of the law firm of Wolpoff & Abramson, L.L.P. in the collection of the amount due from Defendant.

12. Plaintiff performed any and all conditions precedent to the bringing of this action.

13. The amount in controversy is within the jurisdictional amount requiring compulsory arbitration.

WHEREFORE, Plaintiff HSBC BANK NEVADA, N.A., respectfully requests this Honorable Court enter judgment in its favor and against Defendant ALFRED P. SIMMERS for One Thousand Nine Hundred Nine Dollars and Sixty-Six Cents, (\$1,909.66) plus pre-judgment interest in the amount of Four Hundred Thirty-Five Dollars and Nine Cents, (\$435.09), plus costs of suit and such other relief as the Court deems proper and just.

Respectfully submitted,



Amy F. Doyle #87062
Daniel F. Wolfson #20617
Philip C. Warholic #86341
Andrew C. Spears #87737
David R. Galloway #87326
Tonilyn M. Chippie #87852
Sarah E. Ehasz #86469
Robert E. Polas, Jr. #201259
Ronald M. Abramson #94266
Ronald S. Canter #94000
Bruce H. Cherkis #18837
WOLPOFF & ABRAMSON, LLP
Attorneys in the Practice of Debt Collection
4660 Trindle Rd., 3rd Floor
Camp Hill, PA 17011
(717) 303-6700

VERIFICATION

The undersigned hereby states that he/she is the attorney for Plaintiff, HSBC BANK NEVADA, N.A., who is located outside of this jurisdiction and in order to file the within document in an expedient and timely manner, he/she is authorized to execute this verification on behalf of said Plaintiff in the within action and verifies that the statements made in the foregoing Complaint are true and correct to the best of his/her 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. § 4904, relating to unsworn falsification to authorities.

2/28/06



Amy F. Doyle #87062
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*ATTORNEYS IN THE PRACTICE
OF DEBT COLLECTION*
4660 TRINdle ROAD
THIRD FLOOR
CAMP HILL, PA 17011
717-303-6700

EXHIBIT "A"

HOUSEHOLD BANK MASTERCARD STATEMENT

ALFRED P SIMMERS

Page 1 of 2

ACCOUNT SUMMARY		PAYMENT SUMMARY		BALANCE SUMMARY	
ACCOUNT NUMBER	5433-3900-0483-6566	OVERLIMIT AMOUNT	\$188.67	PREVIOUS BALANCE	\$1,581.35
TOTAL CREDIT LIMIT	\$1,505	MINIMUM PAYMENT*	\$42.00	PAYMENTS/CREDITS	- \$0.00
TOTAL CREDIT LIMIT AVAILABLE	\$0	CURRENT PAYMENT DUE*	\$230.67	PURCHASES/DEBITS	+ \$78.11
		PAYMENT DUE DATE	07/30/04		
		PAST DUE AMOUNT	\$40.00		
STATEMENT DATE	07/06/04	*See reverse side for an explanation of these amounts.		FINANCE CHARGE	+ \$34.21
				NEW BALANCE	= \$1,693.67

TRANSACTION SUMMARY

TRAN DATE	POST DATE	TRANSACTION DESCRIPTION	REFERENCE NUMBER	AMOUNT CHARGES	AMOUNT CREDITS
07/01/07/01		LATE CHARGE ASSESSMENT	10000001060000999800460	\$35.00	
06/16/06/16		OVERLIMIT CHARGE ASSESSMENT	10000001060000999698970	\$29.00	
07/06/07/06		ACCOUNTSECURE PLUS 800-690-1532		\$14.11	

PROTECT YOUR CREDIT RATING. YOUR ACCOUNT IS PAST DUE. CALL 800-395-0500 TODAY TO MAKE YOUR PAYMENT. THANK YOU.

MAIL PAYMENTS TO:
 HOUSEHOLD CREDIT SERVICES
 PO BOX 17051
 BALTIMORE MD 21297-1051
 090260 A 06
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 To Assure Proper Credit Please Write Your Account Number On Your Check

QUESTIONS?
 24-HOUR CUSTOMER SERVICE
 ENGLISH/ESPAOL 1-800-477-6000
 OUTSIDE USA, COLLECT: 1-757-523-3880
 TDD HEARING IMPAIRED: 1-800-395-9020
 Manage your account online at:
 www.householdbank.com

MAIL INQUIRIES TO:
 HOUSEHOLD CREDIT SERVICES
 PO BOX 81622
 SALINAS CA 93912-1622

Account Number 5433-3900-0483-6566

New Balance \$1,693.67
 Payment Due Date 07/30/04 Current Payment Due \$230.67

Make checks payable to HOUSEHOLD CREDIT SERVICES. Please write your account number on your check. Do not fold, staple or clip. Do not send cash. Please send your payment 7 days prior to the payment due date to ensure timely delivery.

Amount
 Enclosed

ALFRED P SIMMERS
 4458 HEVERLY BLVD
 COALPORT PA 16627-9011

HOUSEHOLD CREDIT SERVICES
 PO BOX 17051
 BALTIMORE MD 21297-1051

543339000483656600023067001693670

132092435

ALFRED P SIMMERS

Page 2 of 2

FINANCE CHARGE CALCULATION
This is a grace account. Grace period information on back.

Average Daily Balance	Daily Periodic Rate	Days In Billing Cycle	FINANCE CHARGE At Periodic Rate	Nominal Annual Percentage	ANNUAL PERCENTAGE RATE
BALANCE TRANSFER \$342.11	.06846%	30	\$7.03	\$0.00	24.99%
CASH ADVANCES \$1,013.66	.07120%	30	\$21.65	\$0.00	25.99%
PURCHASES \$269.23	.06846%	30	\$5.53	\$0.00	24.99%

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TDD HEARING IMPAIRED: 1-800-395-9020
Manage your account online at:
www.householdbank.com
G STMT36 D

MAIL INQUIRIES TO:
HOUSEHOLD CREDIT SERVICES
PO BOX 81622
SALINAS CA 93912-1622

Account Number	5433-3900-0483-6566
New Balance	\$1,693.67
Payment Due Date	07/30/04
	Current Payment Due \$230.67

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Amount
Enclosed

ALFRED P SIMMERS
4458 HEVERLY BLVD
COALPORT PA 16627-9011

HOUSEHOLD CREDIT SERVICES
PO BOX 17051
BALTIMORE MD 21297-1051

543339000483656600023067001693670

HOUSEHOLD BANK MASTERCARD STATEMENT

ALFRED P SIMMERS

Page 1 of 1

ACCOUNT SUMMARY		PAYMENT SUMMARY		BALANCE SUMMARY	
ACCOUNT NUMBER	5433-3900-0483-6566	OVERLIMIT AMOUNT	\$186.21	PREVIOUS BALANCE	\$1,693.67
TOTAL CREDIT LIMIT	\$1,505	MINIMUM PAYMENT*	\$42.00	PAYMENTS/CREDITS	- \$82.00
TOTAL CREDIT LIMIT AVAILABLE	\$0	CURRENT PAYMENT DUE*	\$228.21	PURCHASES/DEBITS	+ \$43.09
		PAYMENT DUE DATE	08/31/04		
		PAST DUE AMOUNT	\$0.00		
STATEMENT DATE	08/06/04	*See reverse side for an explanation of these amounts.		FINANCE CHARGE	+ \$36.45
				NEW BALANCE	= \$1,691.21

TRANSACTION SUMMARY

TRAN	POST	TRANSACTION	REFERENCE	AMOUNT	
DATE	DATE	DESCRIPTION	NUMBER	CHARGES	CREDITS
07/11	07/12	PAYMENT - THANK YOU	20711040200031261624601		
07/1607/16		OVERLIMIT CHARGE ASSESSMENT	10000001060000999675180	\$29.00	\$82.00
08/0608/06		ACCOUNTSECURE PLUS 800-690-1532		\$14.09	

FINANCE CHARGE CALCULATION

This is a grace account. Grace period information on back.

Average Daily Balance	Daily Periodic Rate	Days Billing Cycle	FINANCE CHARGE At Periodic Rate	FINANCIAL CHARGE	Nominal Annual Percentage	ANNUAL PERCENTAGE RATE
BALANCE TRANSFER \$339.93	.06915%	31	\$7.29	\$0.00	25.24%	25.24%
CASH ADVANCES \$1,006.59	.07189%	31	\$22.43	\$0.00	26.24%	26.24%
PURCHASES \$313.92	.06915%	31	\$6.73	\$0.00	25.24%	25.24%

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 BALTIMORE MD 21297-1051

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 OUTSIDE USA, COLLECT: 1-757-523-3880
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Account Number 5433-3900-0483-6566

New Balance	\$1,691.21
Payment Due Date	08/31/04
Current Payment Due \$228.21	

Make checks payable to HOUSEHOLD CREDIT SERVICES. Please write your account number on your check. Do not fold, staple or clip. Do not send cash. Please send your payment 7 days prior to the payment due date to ensure timely delivery.

Amount
Enclosed

ALFRED P SIMMERS
 4458 EVERLY BLVD
 COALPORT PA 16627-9011

HOUSEHOLD CREDIT SERVICES
 PO BOX 17051
 BALTIMORE MD 21297-1051

HOUSEHOLD BANK MASTERCARD STATEMENT

ALFRED P SIMMERS

Page 1 of 2

TRANSACTION SUMMARY

DATE	DATE	DESCRIPTION	KEY/REF/EX	NUMBER	AMOUNT	
					CHARGES	CREDITS
08/21	08/21	PAYMENT - THANK YOU		20821040390031151665801		\$100.00
08/16	08/16	OVERLIMIT CHARGE ASSESSMENT		10000001060000999672320	\$29.00	
09/06	09/06	ACCOUNTSECURE PLUS 800-690-1532			\$13.92	

MAIL PAYMENTS TO: **HOUSEHOLD CREDIT SERVICES** 24-HOUR CUSTOMER SERVICE
PO BOX 88000 ENGLISH/ESPA OL 1-800-477-6000
BALTIMORE MD 21288-0001 OUTSIDE USA, COLLECT: 1-757-523-3880
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QUESTIONS?
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www.householdbank.com

MAIL INQUIRIES TO:
HOUSEHOLD CREDIT SERVICES
PO BOX 81622
SALINAS CA 93912-1622

Account Number 5433-3900-0483-6566

New Balance \$1,671.25
Payment Due Date 10/01/04 Current Payment Due \$208.25

Make checks payable to HOUSEHOLD CREDIT SERVICES . Please write your account number on your check. Do not fold, staple or clip. Do not send cash. Please send your payment 7 days prior to the payment due date to ensure timely delivery.

**Amount
Enclosed**

ALFRED P SIMMERS
9212 BERGER RD STE 100
COLUMBIA MD 21046-2321

HOUSEHOLD CREDIT SERVICES
PO BOX 88000
BALTIMORE MD 21288-0001

ALFRED P SIMMERS

Page 2 of 2

FINANCE CHARGE CALCULATION
This is a grace account. Grace period information on back.

Average Daily Period In Billing	Days At Periodic	FINANCE CHARGE	Nominal Annual	ANNUAL PERCENTAGE RATE	
Balance	Rate	Cycle	Cash Advance Fees	Rate	
BALANCE TRANSFER \$344.36	.06983%	31	\$7.45	\$0.00 25.49%	25.49%
CASH ADVANCES \$1,019.89	.07257%	31	\$22.94	\$0.00 26.49%	26.49%
PURCHASES \$310.81	.06983%	31	\$6.73	\$0.00 25.49%	25.49%

MAIL PAYMENTS TO:
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BALTIMORE MD 21288-0001
090260 A 06
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SALINAS CA 93912-1622

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Account Number	5433-3900-0483-6566
New Balance	\$1,671.25
Payment Due Date	10/01/04
Current Payment Due	\$208.25

Amount
Enclosed

ALFRED P SIMMERS
9212 BERGER RD STE 100
COLUMBIA MD 21046-2321

HOUSEHOLD CREDIT SERVICES
PO BOX 88000
BALTIMORE MD 21288-0001

543339000483656600020825001671258

HOUSEHOLD BANK MASTERCARD STATEMENT

ALFRED P SIMMERS

Page 1 of 2

ACCOUNT SUMMARY		PAYMENT SUMMARY		BALANCE SUMMARY	
ACCOUNT NUMBER	5433-3900-0483-6566	OVERLIMIT AMOUNT	\$282.30	PREVIOUS BALANCE	\$1,671.25
TOTAL CREDIT LIMIT	\$1,505	MINIMUM PAYMENT*	\$45.00	PAYMENTS/CREDITS	- \$0.00
TOTAL CREDIT LIMIT AVAILABLE	\$0	CURRENT PAYMENT DUE*	\$327.30	PURCHASES/DEBITS	+ \$78.89
CASH CREDIT LIMIT.	\$602	PAYMENT DUE DATE	10/29/04		
CASH LIMIT AVAILABLE	\$0	PAST DUE AMOUNT	\$42.00		
STATEMENT DATE	10/06/04	*See reverse side for an explanation of these amounts.		FINANCE CHARGE	+ \$37.16
				NEW BALANCE	= \$1,787.30

.Cash Credit Limit is a portion of the Total Credit Limit

TRANSACTION SUMMARY

TRAN DATE	POST DATE	TRANSACTION DESCRIPTION	REFERENCE NUMBER	AMOUNT CHARGES	AMOUNT CREDITS
10/01/04		LATE CHARGE ASSESSMENT	10000001060000999781550	\$35.00	
09/16/04		OVERLIMIT CHARGE ASSESSMENT	10000001060000999682360	\$29.00	
10/06/04		ACCOUNTSECURE PLUS 800-690-1532		\$14.89	

PROTECT YOUR CREDIT RATING. YOUR ACCOUNT IS PAST DUE. CALL 800-395-0500 TODAY TO MAKE YOUR PAYMENT. THANK YOU.

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 PO BOX 81622
 SALINAS CA 93912-1622

Account Number 5433-3900-0483-6566

New Balance \$1,787.30
Payment Due Date 10/29/04 Current Payment Due \$327.30

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ALFRED P SIMMERS
 9212 BERGER RD STE 100
 COLUMBIA MD 21046-2321

HOUSEHOLD CREDIT SERVICES
 PO BOX 17051
 BALTIMORE MD 21297-1051

ALFRED P SIMMERS

Page 2 of 2

FINANCE CHARGE CALCULATION
This is a grace account. Grace period information on back.

Average Daily Periodic Balance	Daily Billing Rate	Days In Cycle	FINANCE CHARGE At Periodic Rate	Annual Cash Advance Fees	Nominal Percentage Rate	ANNUAL PERCENTAGE RATE
BALANCE TRANSFER \$351.38	.07052%	30	\$7.43	\$0.00	25.74%	25.74%
CASH ADVANCES \$1,041.18	.07326%	30	\$22.88	\$0.00	26.74%	26.74%
PURCHASES \$323.77	.07052%	30	\$6.85	\$0.00	25.74%	25.74%

MAIL PAYMENTS TO:
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SALINAS CA 93912-1622

Account Number 5433-3900-0483-6566

New Balance \$1,787.30
Payment Due Date 10/29/04 Current Payment Due \$327.30

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ALFRED P SIMMERS
9212 BERGER RD STE 100
COLUMBIA MD 21046-2321

HOUSEHOLD CREDIT SERVICES
PO BOX 17051
BALTIMORE MD 21297-1051

543339000483656600032730001787300

HOUSEHOLD BANK MASTERCARD STATEMENT

ALFRED P SIMMERS

Page 1 of 2

ACCOUNT SUMMARY		PAYMENT SUMMARY		BALANCE SUMMARY	
ACCOUNT NUMBER	5433-3900-0483-6566	OVERLIMIT AMOUNT	\$404.66	PREVIOUS BALANCE	\$1,787.30
TOTAL CREDIT LIMIT	\$1,505	MINIMUM PAYMENT*	\$48.00	PAYMENTS/CREDITS	- \$0.00
TOTAL CREDIT LIMIT AVAILABLE	\$0	CURRENT PAYMENT DUE*	\$452.66	PURCHASES/DEBITS	+ \$79.91
CASH CREDIT LIMIT.	\$602	PAYMENT DUE DATE	12/01/04		
CASH LIMIT AVAILABLE	\$0	PAST DUE AMOUNT	\$87.00		
STATEMENT DATE	11/07/04	*See reverse side for an explanation of these amounts.		FINANCE CHARGE	+ \$42.45
				NEW BALANCE	= \$1,909.66

.Cash Credit Limit is a portion of the Total Credit Limit

TRANSACTION SUMMARY

TRAN DATE	POST DATE	TRANSACTION DESCRIPTION	REFERENCE NUMBER	AMOUNT CHARGES	AMOUNT CREDITS
10/29/04		LATE CHARGE ASSESSMENT	10000001060000999893540	\$35.00	
10/16/04		OVERLIMIT CHARGE ASSESSMENT	10000001060000999511300	\$29.00	
11/06/04		ACCOUNTSECURE PLUS 800-690-1532		\$15.91	

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 HOUSEHOLD CREDIT SERVICES
 PO BOX 81622
 SALINAS CA 93912-1622

Account Number	5433-3900-0483-6566
New Balance	\$1,909.66
Payment Due Date	12/01/04
Current Payment Due \$452.66	

Make checks payable to HOUSEHOLD CREDIT SERVICES. Please write your account number on your check. Do not fold, staple or clip. Do not send cash. Please send your payment 7 days prior to the payment due date to ensure timely delivery.

Amount
Enclosed

ALFRED P SIMMERS
 9212 BERGER RD STE 100
 COLUMBIA MD 21046-2321

HOUSEHOLD CREDIT SERVICES
 PO BOX 17051
 BALTIMORE MD 21297-1051

543339000483656600045266001909664

HOUSEHOLD BANK MASTERCARD STATEMENT

ALFRED P SIMMERS

Page 2 of 2

FINANCE CHARGE CALCULATION

This is a grace account. Grace period information on back.

Average Daily Balance	Daily Periodic Rate	Days In Billing Cycle	FINANCE CHARGE At Periodic Rate	Nominal Annual Fees	ANNUAL PERCENTAGE RATE
BALANCE TRANSFER \$362.15	.07052%	32	\$8.17	\$0.00	25.74%
CASH ADVANCES \$1,074.04	.07326%	32	\$25.18	\$0.00	26.74%
PURCHASES \$403.22	.07052%	32	\$9.10	\$0.00	25.74%

MAIL PAYMENTS TO:
 HOUSEHOLD CREDIT SERVICES
 PO BOX 17051
 BALTIMORE MD 21297-1051

090260 A 06 0000000106 G
 PLEASE DETACH AND RETURN BOTTOM PORTION WITH YOUR PAYMENT:
 To Assure Proper Credit Please Write Your Account Number On Your Check

QUESTIONS?
 24-HOUR CUSTOMER SERVICE
 ENGLISH/ESPAOL 1-800-477-6000
 OUTSIDE USA, COLLECT: 1-757-523-3880
 TDD HEARING IMPAIRED: 1-800-395-9020
 Manage your account online at:
 www.householdbank.com

MAIL INQUIRIES TO:
 HOUSEHOLD CREDIT SERVICES
 PO BOX 81622
 SALINAS CA 93912-1622

Account Number 5433-3900-0483-6566
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HOUSEHOLD BANK MASTERCARD STATEMENT

ALFRED P SIMMERS

Page 1 of 2

ACCOUNT SUMMARY		PAYMENT SUMMARY		BALANCE SUMMARY	
ACCOUNT NUMBER	5433-3900-0483-6566	OVERLIMIT AMOUNT	\$529.13	PREVIOUS BALANCE	\$1,909.66
TOTAL CREDIT LIMIT	\$1,505	MINIMUM PAYMENT*	\$51.00	PAYMENTS/CREDITS	- \$0.00
TOTAL CREDIT LIMIT AVAILABLE	\$0	CURRENT PAYMENT DUE*	\$580.13	PURCHASES/DEBITS	+ \$80.94
CASH CREDIT LIMIT.	\$602	PAST DUE AMOUNT	\$135.00		
CASH LIMIT AVAILABLE	\$0	*See reverse side for an explanation of these amounts.		FINANCE CHARGE	+ \$43.53
STATEMENT DATE	12/06/04			NEW BALANCE	= \$2,034.13

. Cash Credit Limit is a portion of the Total Credit Limit

TRANSACTION SUMMARY

TRAN DATE	POST DATE	TRANSACTION DESCRIPTION	REFERENCE NUMBER	AMOUNT CHARGES	AMOUNT CREDITS
12/01/2/01		LATE CHARGE ASSESSMENT	10000001060000999799810	\$35.00	
11/17/1/17		OVERLIMIT CHARGE ASSESSMENT	10000001060000999692590	\$29.00	
12/06/2/06		ACCOUNTSECURE PLUS 800-690-1532		\$16.94	

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 HOUSEHOLD CREDIT SERVICES
 PO BOX 17051
 BALTIMORE MD 21297-1051

090260 N 06 0000000106 G
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MAIL INQUIRIES TO:
 HOUSEHOLD CREDIT SERVICES
 PO BOX 81622
 SALINAS CA 93912-1622

Account Number 5433-3900-0483-6566
 New Balance \$2,034.13
 Payment Due Date 12/31/04 Current Payment Due \$580.13
 Make checks payable to HOUSEHOLD CREDIT SERVICES. Please write your account number on your check. Do not fold, staple or clip. Do not send cash. Please send your payment 7 days prior to the payment due date to ensure timely delivery.

Amount
 Enclosed

ALFRED P SIMMERS
 9212 BERGER RD STE 100
 COLUMBIA MD 21046-2321

HOUSEHOLD CREDIT SERVICES
 PO BOX 17051
 BALTIMORE MD 21297-1051

HOUSEHOLD BANK MASTERCARD STATEMENT

ALFRED P SIMMERS

Page 2 of 2

FINANCE CHARGE CALCULATION

This is a grace account. Grace period information on back.

Average Daily Balance	Daily Periodic Rate	Days In Billing Cycle	FINANCE CHARGE At Periodic Rate	Nominal Annual Fees	ANNUAL PERCENTAGE RATE
BALANCE TRANSFER \$373.45	.07668%	29	\$8.30	\$0.00	27.99% 27.990%
CASH ADVANCES \$1,108.05	.07668%	29	\$24.64	\$0.00	27.99% 27.990%
PURCHASES \$476.20	.07668%	29	\$10.59	\$0.00	27.99% 27.990%

IMPORTANT INFORMATION

Your AccountSecure protection has been canceled due to the status of your account.

MAIL PAYMENTS TO:	QUESTIONS?	MAIL INQUIRIES TO:
HOUSEHOLD CREDIT SERVICES	24-HOUR CUSTOMER SERVICE	HOUSEHOLD CREDIT SERVICES
PO BOX 17051	1-800-477-6000	PO BOX 81622
BALTIMORE MD 21297-1051	OUTSIDE USA, COLLECT: 1-757-523-3880	SALINAS CA 93912-1622
	TDD HEARING IMPAIRED: 1-800-395-9020	
	Manage your account online at:	
	www.householdbank.com	
090260 N 06 0000000106 G	STMTXX 2 C	
PLEASE DETACH AND RETURN BOTTOM PORTION WITH YOUR PAYMENT:		
To Assure Proper Credit Please Write Your Account Number On Your Check		

Account Number 5433-3900-0483-6566

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Payment Due Date 12/31/04 Current Payment Due \$580.13

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COLUMBIA MD 21046-2321

HOUSEHOLD CREDIT SERVICES
PO BOX 17051
BALTIMORE MD 21297-1051

543339000483656600058013002034132

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101314
NO: 06-341-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: HSBC BANK NEVADA, N.A.
vs.
DEFENDANT: ALFRED P. SIMMERS

SHERIFF RETURN

NOW, March 24, 2006 AT 10:23 AM SERVED THE WITHIN COMPLAINT ON ALFRED P. SIMMERS DEFENDANT AT 4458 BEVERLY BLVD., COALPORT, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO ALFRED P. SIMMERS, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DAVIS / MORGILLO

ED
919:4080
3/18/2006
✓ A. Shaw
Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	WOLPOFF	155948	10.00
SHERIFF HAWKINS	WOLPOFF	155948	90.00

Sworn to Before Me This

____ Day of _____ 2006

So Answers,

Chester A. Hawkins
by Marilyn Harris
Chester A. Hawkins
Sheriff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

HSBC BANK NEVADA, N.A.	:	No. 2006-341-CD
1111 TOWN CENTER DRIVE	:	
LAS VEGAS, NV 89134	:	
	:	
	:	
Plaintiff	:	
	:	
vs.	:	
	:	
KAREN E SIMMERS	:	
	:	
4458 BEVERLY BLVD	:	
COALPORT PA 16627	:	
Defendant(s)	:	

PRAECIPE TO SETTLE AND SATISFY

PLEASE MARK THE ABOVE-CAPTIONED ACTION AS SETTLED, SATISFIED AND DISCONTINUED.

Respectfully submitted,

By: 

Amy F. Doyle #87062 / Daniel F. Wolfson #20617
 Philip C. Warholic #86341 / Andrew C. Spears #87737
 David R. Galloway #87326 / Tonilyn M. Chippie #87852
 Ronald M. Abramson #94266 / Ronald S. Canter #94000
 Bruce H. Cherkis #18837
 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

FILED

7/15/2008 6cc & Cert of
 disc issued to
 MAY 8 2008 Atty Spears

1CC4 1Cert of
 William A. Shaw Disc issued to deft
 Prothonotary (atty enclosed
 envelope)
 Copy to C/A

cc:

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

COPY

HSBC Bank Nevada, N.A.

Vs. **No. 2006-00341-CD**
Alfred P. Simmers

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 May 8, 2006, marked:

Settled, satisfied and discontinued

Record costs in the sum of \$85.00 have been paid in full by Wolpoff & Abramson LLP.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 8th day of May A.D. 2006.



William A. Shaw, Prothonotary