



**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, 3<sup>rd</sup> FLOOR  
CAMP HILL, PA 17011

2006-341-CD

Type of Case: Contract

Type of Pleading: COMPLAINT

VS.


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/4.001  
William A. Shaw  
Prothonotary Clerk of Courts  
1 CENT to SHFF  
1 CENT to ATTY

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

HSBC BANK NEVADA, N.A.  
Plaintiff

NO. 2006-341-C0

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

MAR 03 2006

William A. Shaw  
Prothonotary Clerk of Court

LAW OFFICES  
WOLPOFF & ABRAMSON, L.L.P.  
ATTORNEYS IN THE PRACTICE  
OF DEBT COLLECTION

4660 TRINDLE ROAD  
THIRD FLOOR  
CAMP HILL, PA 17011  
717-303-6700

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 contra 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 contra 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. SIMMERS, 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.

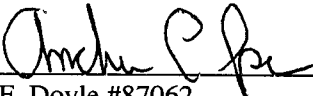
11. Plaintiff has retained the services of the law firm of Wolpoff & Abramson, L.L.P. in the collection of the amount due from Defendant.

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.

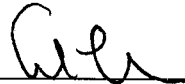
Respectfully submitted,

  
\_\_\_\_\_  
Amy F. Doyle #87062  
Daniel F. Wolfson #20617  
Philip C. Warholc #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., 3<sup>rd</sup> 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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Tonilyn M. Chippie #87852

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WOLPOFF & ABRAMSON, LLP

Attorneys in the Practice of Debt Collection

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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		
		*See reverse side for an explanation of these amounts.		FINANCE CHARGE	+ \$34.21
STATEMENT DATE	07/06/04			NEW BALANCE	= \$1,693.67

## TRANSACTION SUMMARY

TRAN DATE	POST DATE	TRANSACTION DESCRIPTION	REFERENCE NUMBER	AMOUNT CHARGES	CREDITS
07/0107/01		LATE CHARGE ASSESSMENT	10000001060000999800460	\$35.00	
06/1606/16		OVERLIMIT CHARGE ASSESSMENT	10000001060000999698970	\$29.00	
07/0607/06		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

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

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

090260 A 06

G

STMT36 D

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

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

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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	At Periodic Rate	FINANCE CHARGE Cash Advance Fees	Nominal Annual Percentage Rate	ANNUAL PERCENTAGE RATE
BALANCE TRANSFER	\$342.11	.06846%	30	\$7.03	\$0.00	24.99%	24.99%
CASH ADVANCES	\$1,013.66	.07120%	30	\$21.65	\$0.00	25.99%	25.99%
PURCHASES	\$269.23	.06846%	30	\$5.53	\$0.00	24.99%	24.99%

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

QUESTIONS?  
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TDD HEARING IMPAIRED: 1-800-395-9020  
Manage your account online at:  
[www.householdbank.com](http://www.householdbank.com)

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

090260 A 06 G STMT36 D  
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  
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

## 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		
				FINANCE CHARGE	+ \$36.45
STATEMENT DATE	08/06/04	*See reverse side for an explanation of these amounts.		NEW BALANCE	= \$1,691.21

## TRANSACTION SUMMARY

TRAN DATE	POST DATE	TRANSACTION DESCRIPTION	REFERENCE NUMBER	AMOUNT CHARGES	CREDITS
07/11	07/12	PAYMENT - THANK YOU	20711040200031261624601		\$82.00
07/16	07/16	OVERLIMIT CHARGE ASSESSMENT	10000001060000999675180	\$29.00	
08/06	08/06	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 in Billing Cycle	FINANCE CHARGE At Periodic Rate	Cash Advance Fees	Nominal Annual Percentage Rate	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%

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

QUESTIONS?  
24-HOUR CUSTOMER SERVICE  
ENGLISH/ESPA OL 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](http://www.householdbank.com)

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

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D

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

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 HEVERLY BLVD  
COALPORT PA 16627-9011

HOUSEHOLD CREDIT SERVICES  
PO BOX 17051  
BALTIMORE MD 21297-1051

543339000483656600022821001691212

HOUSEHOLD BANK MASTERCARD STATEMENT

ALFRED P SIMMERS

Page 1 of 2

ACCOUNT SUMMARY		PAYMENT SUMMARY		BALANCE SUMMARY	
ACCOUNT 5433-3900-0483-6566 NUMBER		OVERLIMIT AMOUNT	\$166.25	PREVIOUS BALANCE	\$1,691.21
TOTAL CREDIT LIMIT \$1,505		MINIMUM PAYMENT*	\$42.00	PAYMENTS/CREDITS -	\$100.00
TOTAL CREDIT LIMIT \$0 AVAILABLE		CURRENT PAYMENT DUE*	\$208.25	PURCHASES/DEBITS +	\$42.92
		PAYMENT DUE DATE	10/01/04		
CASH CREDIT LIMIT. \$602		PAST DUE AMOUNT	\$0.00		
CASH LIMIT AVAILABLE \$0				FINANCE CHARGE +	\$37.12
STATEMENT DATE 09/06/04		*See reverse side for an ex- planation of these amounts.		NEW BALANCE =	\$1,671.25

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

TRANSACTION SUMMARY

TRAN DATE	POST DATE	TRANSACTION DESCRIPTION	REFERENCE 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  
PO BOX 88000  
BALTIMORE MD 21288-0001

QUESTIONS?  
24-HOUR CUSTOMER SERVICE  
ENGLISH/ESPA OL 1-800-477-6000  
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PO BOX 81622  
SALINAS CA 93912-1622

090260 A 06 G STMT36 D  
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

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

543339000483656600020825001671258

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	At Periodic Rate	FINANCE CHARGE Cash Advance Fees	Nominal Annual Percentage Rate	ANNUAL PERCENTAGE 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%

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SALINAS CA 93912-1622

090260 A 06

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STMT36

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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

New Balance

\$1,671.25

Payment Due Date

10/01/04

Current Payment Due \$208.25

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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	CREDITS
10/0110/01		LATE CHARGE ASSESSMENT	10000001060000999781550	\$35.00	
09/1609/16		OVERLIMIT CHARGE ASSESSMENT	10000001060000999682360	\$29.00	
10/0610/06		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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SALINAS CA 93912-1622

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To Assure Proper Credit Please Write Your Account Number On Your Check

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  
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COLUMBIA MD 21046-2321

HOUSEHOLD CREDIT SERVICES  
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BALTIMORE MD 21297-1051

543339000483656600032730001787300

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	Cash Advance Fees	Nominal Annual 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%

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BALTIMORE MD 21297-1051

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HOUSEHOLD CREDIT SERVICES  
PO BOX 81622  
SALINAS CA 93912-1622

090260 A 06 G STMT36 D  
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
New Balance	\$1,787.30
Payment Due Date	10/29/04
Current Payment Due	\$327.30

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

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	CREDITS
10/2910/29		LATE CHARGE ASSESSMENT	10000001060000999893540	\$35.00	
10/1610/17		OVERLIMIT CHARGE ASSESSMENT	10000001060000999511300	\$29.00	
11/0611/07		ACCOUNTSECURE PLUS 800-690-1532		\$15.91	

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

QUESTIONS?  
24-HOUR CUSTOMER SERVICE  
ENGLISH/ESPA OL 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

090260 A 06 0000000106 G STMT36 D 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	
New Balance	\$1,909.66	
Payment Due Date	12/01/04	Current Payment Due \$452.66

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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	Cash Advance Fees	Nominal Annual Percentage Rate	ANNUAL PERCENTAGE RATE
BALANCE TRANSFER	\$362.15	.07052%	32	\$8.17	\$0.00	25.74%	25.74%
CASH ADVANCES	\$1,074.04	.07326%	32	\$25.18	\$0.00	26.74%	26.74%
PURCHASES	\$403.22	.07052%	32	\$9.10	\$0.00	25.74%	25.74%

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090260 A 06 0000000106 G STMT36 D 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  
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.

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543339000483656600045266001909664

HOUSEHOLD BANK MASTERCARD STATEMENT

ALFRED P SIMMERS

Page 1 of 2

ACCOUNT SUMMARY		PAYMENT SUMMARY		BALANCE SUMMARY	
ACCOUNT 5433-3900-0483-6566 NUMBER		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		PAYMENT DUE DATE	12/31/04		
CASH LIMIT AVAILABLE \$0		PAST DUE AMOUNT	\$135.00		
STATEMENT DATE 12/06/04		*See reverse side for an ex- planation of these amounts.		FINANCE CHARGE +	\$43.53
				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	CREDITS
12/0112/01		LATE CHARGE ASSESSMENT	10000001060000999799810	\$35.00	
11/1711/17		OVERLIMIT CHARGE ASSESSMENT	10000001060000999692590	\$29.00	
12/0612/06		ACCOUNTSECURE PLUS 800-690-1532		\$16.94	

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SALINAS CA 93912-1622

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	
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.

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543339000483656600058013002034132

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	Cash Advance Fees	Nominal Annual Percentage Rate	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.

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BALTIMORE MD 21297-1051

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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	
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.

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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

FILED  
019:40371  
MAR 18 2006  
A Shaw  
Clerk of Courts

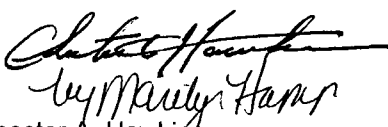
PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	WOLPOFF	155948	10.00
SHERIFF HAWKINS	WOLPOFF	155948	90.00

Sworn to Before Me This

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

\_\_\_\_\_

So Answers,

  
Chester A. Hawkins  
Sheriff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

HSBC BANK NEVADA, N.A.  
1111 TOWN CENTER DRIVE  
LAS VEGAS, NV 89134

: No. 2006-341-CD

:

:

:

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. Warholc #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

cc:

**FILED**

m/1.52cm  
MAY 8 2008  
6cc + 1 Cert of  
disc issued to  
Atty Spears

1cc + 1 Cert of  
William A. Shaw disc issued to debt  
Prothonotary (atty enclosed  
envelope)  
Copy to C/A

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