

06425-CD
Discover Bank vs Brandi N Dodd

2006-425-CD
Discover Bank vs Brandi Dodd

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

DISCOVER BANK

Plaintiff No: D6-425-CD

vs.

COMPLAINT IN CIVIL ACTION

BRANDI N DODD

Defendant FILED ON BEHALF OF
Plaintiff

COUNSEL OF RECORD OF
THIS PARTY:

James C. Warmbrodt, 42524
WELTMAN, WEINBERG & REIS CO., L.P.A.
436 Seventh Avenue, Suite 2718
Pittsburgh, PA 15219
(412) 434-7955
FAX: 412-338-7130
04976270 C A Pit WLG

FILED *Any pd. \$5.00*
m 13/22/06 ICC SHF
MAR 20 2006
LM
William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

DISCOVER BANK

Plaintiff
vs. Civil Action No

BRANDI N DODD

Defendant

COMPLAINT AND 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 an 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 OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

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.

COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
230 EAST MARKET ST., SUITE 228
CLEARFIELD, PA 16830
(814) 765-2641, ext 1300-1301

COMPLAINT

1. Plaintiff, is a corporation with offices at 3311 MILL MEADOW DR. HILLIARD , OH 43026 .

2. Defendant is adult individual(s) residing at the address listed below:

BRANDI N DODD
103 HARPER RD
DU BOIS, PA 15801

3. Defendant applied for and received a credit card issued by Plaintiff bearing the account number 6011298630075269 . A copy of Plaintiff's Statement of Account is attached hereto, marked as Exhibit "A" and made a part hereof.

4. Defendant made use of said credit card and currently has a balance due and owing to Plaintiff, as of March 09, 2006 , in the amount of \$2542.76 .

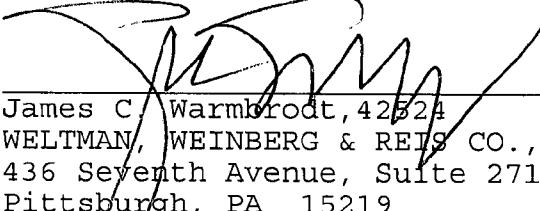
5. Defendant is in default by failing to make payments when due.

6. Plaintiff avers that the Agreement between the parties provides that Defendant will pay Plaintiff's attorneys' fees.

7. Plaintiff avers that such attorneys' fees will amount to \$500.00 .

8. Although repeatedly requested to do so by Plaintiff, Defendant has willfully failed and/or refused to pay the balance due to Plaintiff.

Wherefore, the Plaintiff prays for Judgment in its favor and against Defendant , BRANDI N DODD , INDIVIDUALLY , in the amount of \$2542.76 with interest at the legal rate of 6.000% per annum from date of judgment plus attorneys' fees of \$500.00 , and costs.


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04976270 C A Pit WLG

This law firm is a debt collector attempting to collect this debt for our client and any information obtained will be used for that purpose.

DISCOVER
CARD

new balance
\$0.00

minimum payment due
\$391.00

payment due date
January 30, 2006

account number **6011 2986 3007 5269**
enter amount enclosed below

\$

4976270

30 SDSN6A01 0007779
BRANDI DODD
103 HARPER RD
DU BOIS PA 15801-7411

To order Cash Access Checks, select
your P.I.N., or to find cash locations call
1-800-DISCOVER (1-800-347-2683) or
visit Discovercard.com.

PO BOX 15251 
WILMINGTON DE 19886-5251


Address or telephone change? Please print change in the space above,
or go to Discovercard.com.

0000060112986300752690000000000000000039100

Discover Card Account Summary

account number 6011 2986 3007 5269
payment due date January 30, 2006
minimum payment due \$391.00
credit limit \$1,500.00
credit available \$-1,042.00
cash credit limit \$400.00
cash credit available \$0.00

Closing Date: December 30, 2005 page 1 of 1

previous balance	\$2,542.76
payments and credits	- 2,542.76
purchases	+ 0.00
cash advances	+ 0.00
balance transfers	+ 0.00
FINANCE CHARGES	+ 0.00
new balance	= \$0.00

EXHIBIT

A

Cashback Bonus®

Cashback Bonus® Anniversary
Date: April 19

Opening Cashback Bonus Balance	\$ 0.00
New Cashback Bonus Earned	+ 0.00
Cashback Bonus Balance Available to Redeem	\$ 0.00
	\$ 0.00

Transactions

trans. date post date

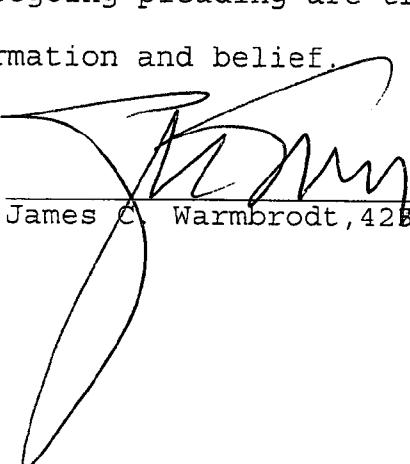
Payments and Credits Dec 31 Dec 31 INTERNAL CHARGE-OFF \$ -2,542.76

Current billing period: 12 days

Average Daily Balances	Daily Periodic Rates	Nominal ANNUAL PERCENTAGE RATES	ANNUAL PERCENTAGE RATES	Periodic FINANCE CHARGES	Transaction Fee FINANCE CHARGES
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VERIFICATION

The undersigned does hereby verify subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities, he/she is an attorney for the Plaintiff herein; makes this Verification based upon the facts as supplied to her by the Plaintiff and/or its agents and because the Plaintiff is outside the jurisdiction of the court and the Plaintiff's Verification cannot be obtained within the time allowed for filing of this pleading, and that the facts set forth in the foregoing pleading are true and correct to the best of her knowledge, information and belief.


James C. Warmbrodt, 42524

04476270 C A Pit KMJ

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101363
NO: 06-425-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: DISCOVER BANK

VS.

DEFENDANT: BRANDI N. DODD

SHERIFF RETURN

NOW, March 31, 2006 AT 2:05 PM SERVED THE WITHIN COMPLAINT ON BRANDI N. DODD DEFENDANT AT SHERIFF'S OFFICE, 1 N. 2ND ST., SUITE 116, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO BRANDI N. DODD, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: COUDRIET /

FILED
01/40/06
APR 25 2006
LSW

William A. Shaw
Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	WELTMAN	1992256	10.00
SHERIFF HAWKINS	WELTMAN	1992256	35.91

Sworn to Before Me This

So Answers,

____ Day of _____ 2006

Chester A. Hawkins
by Marilyn Hagan
Chester A. Hawkins
Sheriff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

DISCOVER BANK

Plaintiff No. 06-425-CD

vs. PRAECLPICE TO SETTLE, DISCONTINUE
AND END

BRANDI N DODD

Defendant

FILED ON BEHALF OF
Plaintiff

COUNSEL OF RECORD OF
THIS PARTY:

James C. Warmbrodt
PA I.D #42524
WELTMAN, WEINBERG & REIS CO., L.P.A.
2718 Koppers Building
436 Seventh Avenue
Pittsburgh, PA 15219
(412) 434-7955

WWR#04976270

FILED *cc & 1 Cert of
7/130cm disc issued to
JUL 19 2006 Atty Warmbrodt
(en)*

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

DISCOVER BANK

Plaintiff

vs.

Civil Action No. 06-425-CD

BRANDI N DODD

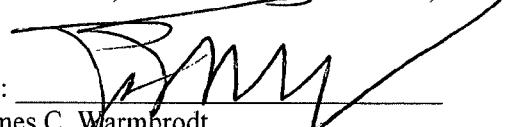
Defendant

PRAECIPE TO SETTLE DISCONTINUE AND END

TO THE PROTHONOTARY OF COUNTY:

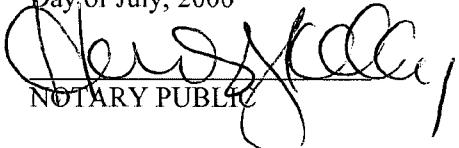
Settle, Discontinue and End the above-captioned matter upon the records of the Court and mark the costs paid.

WELTMAN, WEINBERG & REIS CO., L.P.A.

By: 
James C. Warmbrodt
PA I.D #42524
WELTMAN, WEINBERG & REIS CO., L.P.A.
2718 Koppers Building
436 Seventh Avenue
Pittsburgh, PA 15219
(412) 434-7955
WWR#04976270

Sworn to and subscribed

Before me the 10
Day of July, 2006


NOTARY PUBLIC

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal

Heidi J. Kelly, Notary Pub

Pittsburgh, Allegheny

Commission Expires Nov

2007

Pennsylvania Association of Notaries

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

copy

Discover Bank

Vs.
Brandi N. Dodd

No. 2006-00425-CD

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 July 19, 2006, marked:

Settled, discontinued and ended

Record costs in the sum of \$85.00 have been paid in full by James C. Warmbrodt Esq.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 19th day of July A.D. 2006.



William A. Shaw, Prothonotary