

06-425-CD  
Discover Bank vs Brandi N Dodd

Discover Bank vs Brandi Dodd  
2006-425-CD

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

DISCOVER BANK

Plaintiff

vs.

BRANDI N DODD

Defendant

No: *06-425-CD*

COMPLAINT IN CIVIL ACTION

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. 85.00*  
*m 13:22/31*  
**MAR 20 2006** *iccs hf*  
*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 s 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 .

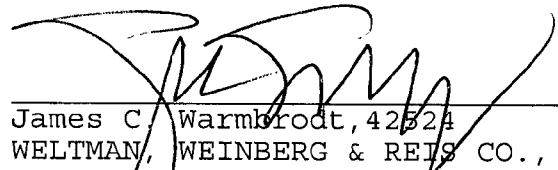
5. Defendant is in default by failing to make payments when due.

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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FAX: 412-338-7130  
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.



new balance  
\$0.00

minimum payment due  
\$391.00

account number 6011 2986 3007 5269  
enter amount enclosed below

payment due date  
January 30, 2006

\$

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

Closing Date: December 30, 2005 page 1 of 1

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

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

**EXHIBIT**

**A**

### Cashback Bonus®

Cashback Bonus® Anniversary  
Date: April 19

Opening Cashback Bonus Balance	\$ 0.00
New Cashback Bonus Earned	+ 0.00
<b>Cashback Bonus Balance</b>	<b>\$ 0.00</b>
<b>Available to Redeem</b>	<b>\$ 0.00</b>

### Transactions

	trans. date	post date		
Payments and Credits	Dec 31	Dec 31	INTERNAL CHARGE-OFF	\$ -2,542.76

Average  
Daily  
Balances

Daily  
Periodic  
Rates

Nominal  
ANNUAL  
PERCENTAGE  
RATES

ANNUAL  
PERCENTAGE  
RATES

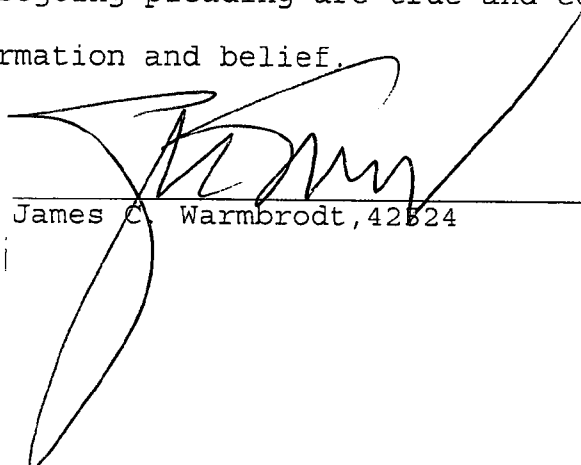
Periodic  
FINANCE  
CHARGES

Transaction  
Fee  
FINANCE  
CHARGES

current billing period: 12 days

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

04476276 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  
9/11/40  
APR 25 2006  
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

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

So Answers,

  
Chester A. Hawkins  
Sheriff



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

DISCOVER BANK

Plaintiff

vs.

BRANDI N DODD

Defendant

No. 06-425-CD

PRAECIPE TO SETTLE, DISCONTINUE  
AND END

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** rec'd 1 Cert of  
9/11:30am disc issued to  
JUL 19 2006 Ally Warmbrodt  
(m)

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

BRANDIN 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

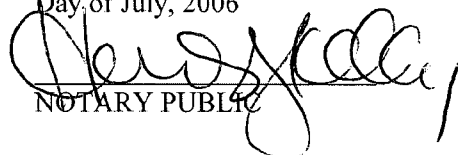
(412) 434-7955

WWR#04976270

Sworn to and subscribed

Before me the 10

Day of July, 2006

  
NOTARY PUBLIC

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal  
Jodi J. Kelly, Notary Public  
Pittsburgh, Allegheny  
Commission Expires Nov  
Pennsylvania Association of Notaries

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

**CIVIL DIVISION**

**Discover Bank**

**Vs.  
Brandi N. Dodd**

**No. 2006-00425-CD**

COPY

**CERTIFICATE OF DISCONTINUATION**

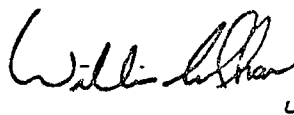
Commonwealth of PA  
County of Clearfield

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