

06-1202-CD

MBNA America vs Holly Biggans

2006-1202-CD

MBNA America vs Holly Biggans

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

MBNA AMERICA BANK, N.A.

No. *06-1202-CD*

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

Plaintiff

Type of Case: Contract

VS.

HOLLY J BIGGANS
773 KNOX RUN RD
MORRISDALE PA 16858

Type of Pleading:

Filed on Behalf of: Plaintiff

Defendant(s)

Date: 7/20/06

C

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

FILED Atty pd. 85.00
7/27/06
JUL 27 2006 100 Shff

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

MBNA AMERICA BANK, N.A.	:No.
Plaintiff	:
VS	:
HOLLY J BIGGANS	:CIVIL ACTION - LAW
Defendant(s)	:
	:
	:
	:

NOTICE

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 or any other claim or relief requested by the Plaintiff. You may lose money or property 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 HELP. 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.

Clearfield County Courthouse
David S. Meholic, Court Administrator 230 East Market Street
Clearfield, PA 16830-
814-765-2641

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

MBNA AMERICA BANK, N.A. :No.
Plaintiff :
VS :
HOLLY J BIGGANS :CIVIL ACTION - LAW
Defendant(s) :
.

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 importantes 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
PROVEER INFORMACION ACERCA AGENCIAS. QUE PUEDAN OFRECER
SERVICIOS LEGAL A PERSONAS ELIGIBLE A UN HONORARIO REDUCIDO O
GRATIS

Clearfield County Courthouse
David S. Meholic, Court Administrator 230 East Market Street
Clearfield, PA 16830-
814-765-2641

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

MBNA AMERICA BANK, N.A.

Plaintiff

: No.

VS.

HOLLY J BIGGANS

Defendant(s)

: CIVIL ACTION - LAW

COMPLAINT

AND NOW, this 06 day of July, 2006, comes the Plaintiff, MBNA America Bank, N.A., by and through its attorneys, the law firm of Wolpoff & Abramson, L.L.P., and files the within Complaint and in support avers as follows:

1. Plaintiff, MBNA AMERICA BANK, N.A. , is a National Banking Association organized under the National Banking Act with principal place of business situated at P.O. BOX 15718, WILMINGTON, DELAWARE 19850.
2. Defendant, HOLLY J BIGGANS, is an adult individual with a last known address of 773 KNOX RUN RD, MORRISDALE, CLEARFIELD COUNTY, PA 16858.
3. It is averred that Defendant was issued an open-end credit card account by Plaintiff. This account was created through a written contract between Plaintiff and Defendant, accepted by Defendant when he signed and utilized the credit card account. A true and correct copy of the Credit Card Agreement governing this account is attached hereto as Exhibit "A."
4. The Credit Card Agreement contains a binding Arbitration provision providing that any claim or dispute between Defendant and Plaintiff would be subject to binding arbitration before the National Arbitration Forum (NAF). This Credit Card Agreement also recites that since the agreement involved an instrumentality of interstate commerce, that the Federal Arbitration Act, 9 U.S.C. §§1-16

(FAA) governed the Agreement and that following disposition through the NAF, judgment may be entered in any state court having jurisdiction.

5. At all relevant times material hereto, Defendant has been regular user of said charge card for the purchase of products, goods and/or for obtaining services and/or funds.

6. By virtue of Defendant's use and maintenance of this credit card in connection with his purchases of goods, and services, he became bound to all of its contractual terms, which clearly included an arbitration agreement. Therefore, there is a valid agreement to arbitrate and Defendant consented to the NAF having jurisdiction over this claim.

7. Defendant received monthly statements which accurately state all purchases and payments made during the month, interest charges imposed on the unpaid balance, and the amount due. A summary of the account showing the balance due and owing is incorporated herein and marked as Exhibit "B".

8. Defendant did not object to the summary of account.

9. Defendant has made sporadic and irregular payments, if any, which have been applied to the outstanding balance of this account.

10. As of the date of the within Complaint, the remaining balance due, owing and unpaid on Defendant's credit account, as a result of charges made by said Defendant and/or any authorized users is the sum of \$7,742.39.

11. Pursuant to the Credit Agreement and/or applicable Pennsylvania law, any unpaid and/or delinquent balances on said account shall continue to bear interest at the rate of 10 %.

12. The amount of interest which has accrued on the aforementioned account is the sum of \$165.45.

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

14. 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 balance, all to the damage and detriment of the Plaintiff.

15. Any and all conditions precedent to the bringing of this action have been performed by Plaintiff.

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

WHEREFORE, Plaintiff, MBNA America Bank, N.A., respectfully requests this Honorable Court enter judgment in favor of Plaintiff and against Defendant, in the amount of \$7,742.39, interest in the amount of \$165.45, plus costs of this action and any other relief as this Court deems proper and just.

Respectfully submitted,

Date: 7/20/04



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 N. Polas, Jr. #201259
Bruce H. Cherkis #18837 / Ronald S. Canter #94000
Ronald M. Abramson #94266
WOLPOFF & ABRAMSON, L.L.P.
Attorneys in the Practice of Debt Collection
4660 Trindle Road, 3rd Floor
Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

VERIFICATION

The undersigned hereby states that he/she is the attorney for the Plaintiff, MBNA America Bank, 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 take 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. Section 4904, relating to unsworn falsification to authorities.

Date: 7/20/04



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Telephone: (717) 303-6700
Counsel for Plaintiff

Exhibit "A"

Credit Card Agreement

Additional Terms and Conditions

Privacy Notice

Credit Reporting

Selected Sections

YOUR CONTRACT WITH US

Your Credit Card Agreement with us consists of these Additional Terms and Conditions and the document called the Required Federal Disclosure or the Initial Disclosure. You agree to the terms and conditions of this Agreement. For the purpose of the Privacy Notice, we will use the definitions contained in the third paragraph of the Privacy Notice. For the remainder of the Agreement, we will use the definitions described under the section heading *Words Used Only in This Agreement*.

Privacy Notice

Your privacy is important to us. At MBNA, we are committed to providing you with the finest financial products and services backed by consistently top-quality service. And while information about you is fundamental to our ability to do this, we fully recognize the importance of keeping personal and account information secure.

To offer you the widest range of products and services, MBNA may share information about you both within MBNA and outside of MBNA with other companies. This allows us to offer you products and services that may interest you and best meet your needs, whether they are available directly from MBNA or through our relationships with other companies. We want you to understand our information safeguards, what information we collect, what information we share, and the benefits you receive when we share information about you.

This notice describes the privacy practices of MBNA Corporation and all MBNA affiliates, including MBNA America Bank, N.A., MBNA America (Delaware), N.A., Canadian Travel Services, Inc., MBNA Hallmark, Information Services, Inc., MBNA Marketing Systems, Inc., and MBNA Insurance Agency, Inc. (collectively, "MBNA"), for financial products and services governed by the laws of the United States of America. This notice explains MBNA's information collection and sharing practices and lets you choose whether or not within MBNA or outside of MBNA with other companies

Our Security Procedures: MBNA understands the importance of protecting and securing information and using it appropriately. Access to information about you is restricted to the people of MBNA who require it to provide products or services to you. We maintain physical, electronic, and procedural safeguard that comply with federal standards for the security of information.

When MBNA shares information about you with companies outside of MBNA, we require them to impose safeguards, use it only for a permitted purpose and to return it to us or destroy it once that purpose is served. We limit the amount of information shared to what is appropriate to offer a product or service efficiently. MBNA requires any company receiving information from MBNA to sign a Confidentiality Agreement containing these requirements and obligating that company to protect the information as we would.

Information We Collect: MBNA collects and uses nonpublic personal information about you to conduct our business and to consistently deliver the top-quality customer service you expect from us. Sources of this information include the following:

- Information we receive from you on applications and other forms or through your correspondence or communication with us, including through the mail, by telephone, or over the Internet;
- Information we receive from third parties, such as consumer reporting agencies, to verify statements you've made to us, or regarding your employment, credit, or other relationships; and

• Information about your transactions with MBNA and with other companies outside of MBNA.

Information We Share Within MBNA: We may share all of the information we collect about you with financial service companies within MBNA to offer additional products or services that may interest you and best meet your needs. We believe this is convenient for you and may save you both time and money. To do so, we share identification information (such as name and address), transaction and experience information (such as purchases and payments), credit eligibility information (such as credit reports and applications), and other information. The decision to purchase any such products or services is yours alone. You may tell us not to share credit eligibility information about you within MBNA, but please understand this does not prohibit us from offering you additional products and services or from sharing transaction and experience information, identification, and other information within MBNA.

Information We Share With Others: From time to time, we may allow companies outside of MBNA to offer you their products and services that may interest you. These products and services may be offered by financial service providers (such as banks, loan brokers, account aggregators, insurance agents, insurance companies, mortgage bankers, and securities broker-dealers), by nonfinancial companies (such as retailers, direct mail, brokers, communications companies, Internet service providers, manufacturers, service companies, travel agents, cruise lines, car rental agencies, hotels, airlines, publishers, and organizations endorsing MBNA financial products or services), and others (such as nonprofit organizations). Subject to applicable law, we may share all the information we collect with these companies outside of MBNA, unless you tell us not to.

Additionally, we may share all the information we collect with companies that perform marketing or other services on our behalf or to other financial institutions with which we have joint marketing agreements. We are also permitted by law to share information about you with other companies in certain circumstances. For instance, we may share all of the information we collect with companies assisting us in servicing your loan or account, with companies that endorse our products and services through affinity agreements, with government entities in response to subpoenas or

Exhibit "B"

CLIENT NO 001730 MBNA ACCT#4264297168069735 BALANCE -- 7,742.39
***** PRIMARY DEBTOR ***** C/O DATE 01/01/69 LSTPY DT 03/18/06
*M-ACCT-NO *M-REC-TYPE*M-CUST-TYPE*M-LAST-NAME
4264297168069735 A BIGGANS
*M-FIRST-NAME *M-ADDR-1 *M-ADDR-2
HOLLY J C/O THE ROLL LAW OFC PLLC PO BOX 2410
*M-CITY *M-COUNTY *M-STATE*M-ZIP *M-HOME-PH
TEMPE AZ 852802410 8888178787
*M-WORK-PH *M-DOB *M-POE-NAME
0000000000
*M-POE-ADDR *M-LOAN-TYPE*M-LENDING-OFFICER
LV01 OV0001
*M-BANK-CODE*M-BRANCH-CODE*M-CALL-CODE*M-RECOVERER-CODE*M-DEALER-CODE
ATTY
*M-CO-RSN*M-ACCT-STATUS*M-INT-RATE*M-RECEIPT-DATE*M-CONTACT-DATE*M-CO-DATE
PQP 0000 04/17/06 11/30/01 01/01/69
*M-LAST-PYMT-DATE*M-CO-AMT *M-ASSOC-COST*M-ACCRUED-INT*M-CUR-BAL
03/18/06 7,742.39 .00 .00 7,742.39
*M-NET-PRIN *M-NET-COST *M-NET-INT *M-COMMENT-1
7,742.39 .00 .00 M121223456777
*M-COMMENT-2
001 20060417 0000065
*M-COMMENT-3 *M-COMMENT-DATE
04/17/06
*M-2ND-NAME *M-MONTHLY-INCOME*M-OTHER-INCOME
.00 .00
*M-MONTHLY-PYMT*M-OTHER-PYMT*M-OWN-RENT-CODE*M-RECOVERY-SCORE*M-NEXT-PAY-DATE
.00 .00 R 0000
*M-LAST-INT-DATE*M-LAST-CONTACT-DATE*M-COMM-RATE*M-HOME-PH-FLAG*M-WORK-PH-FLAG
0000
*M-ADDR-FLAG*M-SSN *M-MIO*M-AG

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101765
NO. 06-1202-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: MBNA AMERICA BANK, N.A.
vs.
DEFENDANT: HOLLY J. BIGGANS

SHERIFF RETURN

NOW, July 31, 2006 AT 2:49 PM SERVED THE WITHIN COMPLAINT ON HOLLY J. BIGGANS DEFENDANT AT SHERIFF'S OFFICE, 1 N. 2ND ST., SUITE 116, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO HOLLY J. BIGGANS, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: NEVLING / HUNTER

FILED
0/3/10 cm
AUG 10 2006

William A. Shaw
Prothonotary

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	WOLPOFF	33211	10.00
SHERIFF HAWKINS	WOLPOFF	33211	30.96

Sworn to Before Me This

____ Day of _____ 2006

So Answers,

Chester A. Hawkins
by Marilyn Haskins
Chester A. Hawkins
Sheriff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

MBNA AMERICA BANK, N.A.

No. 06-1202- CD

Plaintiff

VS

CIVIL ACTION - LAW

HOLLY J BIGGANS

Defendant(s)

PRAECLPICE FOR JUDGMENT

Please enter Judgment in favor of Plaintiff and against Defendant(s), HOLLY J BIGGANS , for failure to answer the Complaint.

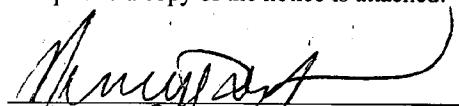
(X)	Amount due	\$7,907.84
	Less credits	\$
	TOTAL	\$7,907.84, plus interest and costs

(X) I certify that the foregoing assessment of damages is for specified amounts alleged to be due in the complaint and is calculable as a sum certain from the complaint.

(X) Pursuant to Pa.R.C.P. 237 (Notice of Praeclpice for final judgment or decree), I certify that a copy of this praecipe has been mailed to each other party who has appeared in the action or to his/her Attorney of Record.

(X) Pursuant to Pa.R.C.P. 237.1, I certify that written notice of the intention to file this praecipe was mailed or delivered to the party against whom judgment is to be entered and to his/her Attorney of Record, if any, after the default occurred and at least ten days prior to the date of the filing of this praecipe and a copy of the notice is attached.

Date: 9/25/06


Amy F. Doyle #87062 / Daniel F. Wolfson #20617
Philip C. Warholic #86341 / Andrew C. Spears #87737
David R. Galloway #87326 / Tonilyn M. Chippie #87852
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WOLPOFF & ABRAMSON, L.L.P.
Attorneys in the Practice of Debt Collection
4660 Trindle Road, Suite 300
Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

FILED

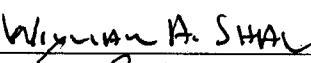
OCT 05 2006

W.A. Shaw
Prothonotary/Clerk of Courts

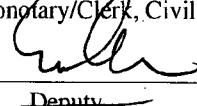
1 cent to Attn

1 cent to Derr,
W/Notch

NOW, Oct. 5, 2006, JUDGMENT IS ENTERED AS ABOVE.


William A. Shaw
Prothonotary/Clerk, Civil Division

By:


Deputy

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

MBNA AMERICA BANK, N.A.

No. 06-1202- CD

Plaintiff

VS

CIVIL ACTION - LAW

HOLLY J BIGGANS

Defendant(s)

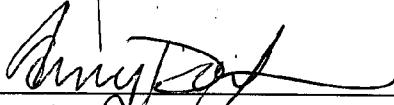
AFFIDAVIT OF NON-MILITARY SERVICE

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF CUMBERLAND

The undersigned counsel, being duly sworn according to law, depose and say that I am the Attorney for the Plaintiff in the above-captioned matter, and that to the best of my knowledge, information and belief Defendant, Holly J Biggans, above-named, is over 21 years of age; is last known to reside at 773 Knox Run Rd Morrisdale, County of Clearfield, Pennsylvania; is not in the military service of the United States or its Allies, or otherwise within the provisions of the Servicemembers Civil Relief Act and its Amendments.

Date: 9/25/06


Amy F. Doyle #87062 / Daniel F. Wolfson #20617
Philip C. Warholc #86341 / Andrew C. Spears #87737
David R. Galloway #87326 / Tonilyn M. Chippie #87852
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Attorneys in the Practice of Debt Collection
4660 Trindle Road, Suite 300
Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal

Kimberly L. Eisenhauer, Notary Public
Hampden Twp., Cumberland County
My Commission Expires Nov. 17, 2009

Member, Pennsylvania Association of Notaries

SWORN and SUBSCRIBED to before me this 25 day of

September, 2006


Kimberly L. Eisenhauer
Notary Public

W & A File No. 159544194

W&A File No. 159544194

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

MBNA AMERICA BANK, N.A.

No. 06-1202- CD

Plaintiff

VS

CIVIL ACTION - LAW

HOLLY J BIGGANS

Defendant(s)

CERTIFICATE OF RESIDENCE
PA. R.C.P. 236

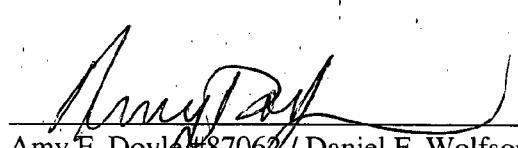
I hereby certify that the precise address of Plaintiff is:

Mbna America Bank, N.A.
655 Paper Mill Road
Mail Stop 1411
Wilmington DE 19884-1411

and certify that the last known address of the within Defendant(s) is:

Holly J Biggans
773 Knox Run Rd
Morrisdale PA 16858

Date: 9/25/06


Amy F. Doyle #87062 / Daniel F. Wolfson #20617
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4660 Trindle Road, Suite 300
Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

MAIN OFFICE

TWO IRVINGTON CENTRE
702 KING FARM BLVD., ROCKVILLE, MD 20850

REGIONAL OFFICES

10805 JUDICIAL DR., BLDG. A-5, FAIRFAX, VA 22303
 1108 E. MAIN ST., STE. 1003, RICHMOND, VA 23216
 5122 GREENWICH RD., VIRGINIA BEACH, VA 23462
 919 N. MARKET ST., STE. 1300, WILMINGTON, DE 19899
 1 VALLEY BANK BLDG., BOX 1226, CLARKSBURG, WV 26302
 4660 TRINDE ROAD, 3RD FLOOR, CAMP HILL, PA 17011
 28632 ROADSIDE DR., STE. 265, AGOURA HILLS, CA 91301
 39500 HIGH POINTE BLVD., STE. 250, NOVI, MI 48375
 300 CANAL VIEW BLVD., ROCHESTER, NY 14623
 5215 N. O'CONNOR BLVD., STE. 1080, LAS COLINAS, TX 75039
 180 GLASTONBURY BLVD., GLASTONBURY, CT 06033
 210 INTERSTATE NORTH PKWY., STE. 700, ATLANTA, GA 30339
 301 CARLSON PKWY., STE. 303, MINNETONKA, MN 55435

LAW OFFICES
WOLPOFF & ABRAMSON, L.L.P.

Attorneys in the Practice of Debt Collection
 (A National Collection Attorney Network Firm)

4660 TRINDE ROAD
 SUITE 300
 CAMP HILL, PA 17011

717-303-6700

OUTSIDE THE CAMP HILL LOCAL AREA
 (TOLL FREE)

1-800-758-0675

FACSIMILE 717-737-9051

PLEASE DIRECT ALL INQUIRIES TO THE CAMP HILL OFFICE

September 08, 2006

NATIONAL COLLECTION ATTORNEY NETWORK**AFFILIATED FIRM LOCATIONS (NOT REGIONAL)**

OFFICES OF WOLPOFF & ABRAMSON, L.L.P.†
 BIRMINGHAM, ALABAMA CEDAR KNOLLS, NEW JERSEY
 ANCHORAGE, ALASKA RALEIGH, NORTH CAROLINA
 PHOENIX, ARIZONA FARGO, NORTH DAKOTA
 CABOT, ARKANSAS CLEVELAND, OHIO
 ENGLEWOOD, COLORADO OKLAHOMA CITY, OKLAHOMA
 FT. LAUDERDALE, FLORIDA EUGENE, OREGON
 HONOLULU, HAWAII PROVIDENCE, RHODE ISLAND
 BOISE, IDAHO COLUMBIA, SOUTH CAROLINA
 CHICAGO, ILLINOIS KNOXVILLE, TENNESSEE
 MERRILLVILLE, INDIANA SANDY, UTAH
 KANSAS CITY, KANSAS MILWAUKEE, WISCONSIN
 LEXINGTON, KENTUCKY RAWLINS, WYOMING

* The National Collection
 Attorney Network is an
 affiliation of separate law firms.

W&A Hours of Operation:
 8 a.m.-5:30 p.m. ET M-F

HOLLY J BIGGANS
773 KNOX RUN RD
MORRISDALE, PA 16858

W&A File No. 159544194

RE: MBNA AMERICA BANK, N.A.
vs. HOLLY J BIGGANS

Dear Holly J Biggans:

Enclosed herein please find a 10-Day Notice pursuant to Rule 237.1 of the Pennsylvania Rules of Civil Procedure.

Sincerely,

Amy F. Doyle #87062 / Daniel F. Wolfson #20617
 Philip C. Warholic #86341 / Andrew C. Spears #87737
 David R. Galloway #87326 / Tonilyn M. Chippie #87852
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WOLPOFF & ABRAMSON, L.L.P.
 Attorneys in the Practice of Debt Collection
 4660 Trindle Road, Suite 300
 Camp Hill, PA 17011
 Telephone: (717) 303-6700
 Counsel for Plaintiff

COPY

Enclosure

cc: Guy Roll
 Roll Law Office
 15300 N 90Th St Ste 900
 Scottsdale AZ 85260-0000

This is an attempt by a debt collector to collect a debt and any information obtained will
 be used for that purpose

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

MBNA AMERICA BANK, N.A.

NO. 06-1202- CD

Plaintiff

vs.

CIVIL ACTION - LAW

HOLLY J BIGGANS

Defendant(s)

TO: HOLLY J BIGGANS
773 KNOX RUN RD
MORRISDALE PA 16858

DATE OF NOTICE: September 08, 2006

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS.

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.

CLEARFIELD COUNTY COURTHOUSE
DAVID S. MEHOLICK, COURT ADMINISTRATOR 230 EAST MARKET STREET
CLEARFIELD, PA 16830
814-765-2641


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 N. Polas, Jr. #201259
Bruce H. Cherkis #18837 / Ronald S. Canter #94000
Ronald M. Abramson #94266
WOLPOFF & ABRAMSON, L.L.P.
Attorneys in the Practice of Debt Collection
4660 Trindle Road, Suite 300
Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

MBNA AMERICA BANK, N.A.

No. 06-1202-CD

) Plaintiff

VS

CIVIL ACTION - LAW

HOLLY J BIGGANS

Defendant(s)

NOTICE OF JUDGMENT

(x) Notice is hereby given that a Judgment in the above-captioned matter has been entered against you in the amount of \$7,907.84, plus interest, on OCT. 5, 2006.

(x) A copy of all documents filed with the Prothonotary in support of the within judgment is/are attached.

By: Lil

If you have any questions regarding this Notice, please contact the filing party.

Date: 7/05/06

Amy Doyle
Amy F. Doyle #87062 / Daniel F. Wolfson #20617
Philip C. Warholic #86341 / Andrew C. Spears #87737
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Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

This Notice is given in accordance with Pa.R.C.P. 236.)

NOTICE SENT TO: Holly J Biggans
773 Knox Run Rd
Morrisdale PA 16858

FILED
OCT 05 2006
William A. Shaw
Prothonotary/Clerk of Courts

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3241

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

MBNA AMERICA BANK, N.A.

: No. 06-1202- CD

Plaintiff

: CIVIL ACTION - LAW

vs.

HOLLY J BIGGANS

Defendant(s)

:

:

PRAECIPE TO SATISFY JUDGMENT

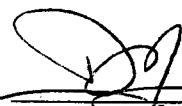
To the Prothonotary:

Please mark the judgment in the above-entitled cause as paid and satisfied.

Respectfully Submitted,

By:

Date: 2/6/07


David R. Galloway #87326/Philip C. Warholic #86341
Sarah E. Ehasz #86469/Robert N. Polas, Jr. #201259
Amy F. Doyle #87062
Mann Bracken LLP / Counsel for Plaintiff
The Successor by Merger to Wolpoff & Abramson, LLP
and Eskanos & Adler, P. C.
4660 Trindle Road, Suite 300, Camp Hill, PA 17011
Telephone: (717) 303-6700 Fax: (717) 737-9051

pd \$7.00 Atty
S FILED ^{2cc 4}
m/1:45pm 2 cont'd
MAR -2 2009 Set issued
to Atty
William A. Shaw
Prothonotary/Clerk of Courts
Galloway

FILED

MAR -2 2009

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

CERTIFICATE OF SATISFACTION OF JUDGMENT

No.: 2006-01202-CD

MBNA America Bank, N.A.

Debt: \$7907.84

Vs.

Atty's Comm.:

Holly J. Biggans

Interest From:

Cost: \$7.00

NOW, Monday, March 02, 2009 , directions for satisfaction having been received, and all costs having been paid, SATISFACTION was entered of record.

Certified from the record this 2nd day of March, A.D. 2009.



cm
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

MBNA AMERICA BANK, N.A.

: No. 06-1202- CD

Plaintiff

: CIVIL ACTION - LAW

vs.

HOLLY J BIGGANS

Defendant(s)

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the Praeclipe
 was served upon the individual(s) listed below by Regular Mail, Postage Pre-Paid on
 2/24/09

GUY ROLL
 15300 N. 90th St. Ste 900
 Scottsdale, AZ 85260

HOLLY J BIGGANS
 PO BOX 15
 LANSE PA 16849-0015

5 **FILED** *acc 444*
m/145cm Galloway
 MAR - 2 2009

William A. Shaw
 Prothonotary/Clerk of Courts

DJ
 David R. Galloway #87326/Philip C. Warholic #86341
 Sarah E. Ehasz #86469/Robert N. Polas, Jr. #201259
 Amy F. Doyle #87062
 Mann Bracken LLP / Counsel for Plaintiff
 The Successor by Merger to Wolpoff & Abramson, LLP
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