

GREGG L. MORRIS, ESQ.
PATENAUDE & FELIX, A.P.C.
213 E. MAIN STREET
CARNEGIE, PA 15106
(412) 429-7675
FACSIMILE (412) 429-7679
PA ID#69006

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK

Plaintiff,

v.

DONNA M MONACO ,

Defendant(s).

)
)
) NO. 06-1508-CD
)
)
)
)
)
)
)

COMPLAINT IN CIVIL ACTION

Filed on behalf of:
TARGET NATIONAL BANK ,
Plaintiff

Counsel of Record for This Party:

Gregg L. Morris, Esquire
Pa I.D. #69006

Patenaude & Felix, A.P.C.
213 East Main Street
Carnegie, PA 15106
(412) 429-7675

FILED Atty pd. 85.00
M11:51/61
SEP 18 2006 ICC Shff

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK ,)	
)	
Plaintiff,)	NO.
)	
v.)	
)	
DONNA M MONACO ,)	
)	
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 are 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.

David S. Meholic
Court Administration
Clearfield County Courthouse
Clearfield, PA 16830
814-765-2641

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK ,)	
)	
Plaintiff)	NO.
)	
v.)	
)	
DONNA M MONACO ,)	
)	
Defendant.)	
)	

COMPLAINT IN CIVIL ACTION

AND NOW, comes Plaintiff, TARGET NATIONAL BANK , by and through its attorney, GREGG L. MORRIS, ESQUIRE and the law offices of PATENAUDE & FELIX, A.P.C. and files the following **Complaint in Civil Action**, and in support thereof aver as follows:

1. Plaintiff, TARGET NATIONAL BANK , is a corporation and for the purpose of this litigation, maintaining a place of business c/o Patenaude and Felix, A.P.C., 213 East Main Street, Carnegie, Pennsylvania 15106.
2. Defendant is DONNA M MONACO , an adult individual, believed to currently reside at 2 N 2ND ST , CLEARFIELD, PA 168302439.
3. Heretofore, the Defendant opened a TARGET NATIONAL BANK account with Plaintiff being Account No. 4352376695584409 , for the purchase of goods and services.
4. The Defendant has made or authorized a number of purchases and as of 06/19/06, Defendant owes \$1,842.79 on said account plus interest.

5. Plaintiff maintains accurate books of account recording all credits and debits for this account.

6. The Defendant has received monthly billing statements from Plaintiff setting forth the nature and amount of all charges made by Defendant, and the transactions between Plaintiff and Defendant give rise to an account stated, upon which Plaintiff has relied.

7. The Defendant made payments, but has refused to pay, and now refuses to pay the balance due and owing on the aforesaid account in the sum of \$1,842.79, plus interest and costs.

8. By failing to object or dispute to the statements including the statement attached hereto as Plaintiff's Exhibit "A", Defendant has assented to and agreed to the correctness of the balance due on the credit card account so as to constitute an account stated.

9. Despite repeated demands, Defendant has failed to make the required installment payments when due and therefore the full amount of the account is now due and payable.

WHEREFORE, Plaintiff demands Judgment in its favor, and against Defendant, in the amount of \$1,842.79, plus legal interest from the date of breach, with continuing interest at the legal rate thereon from the date of Judgment plus costs. The damages requested are less than the maximum amount for compulsory arbitration as set by the Court.

Respectfully Submitted:

Patenaude & Felix, A.P.C.



GREGG L. MORRIS, ESQUIRE

213 E. Main Street
Carnegie, PA 15106
(412) 429-7675



00000

Account Number: 4352-3766-9558-4409
DONNA M MONACO

Statement Closing Date: July 14, 2006
Page 1 of 1

Target Visa Account Summary

Total Credit Limit \$0
Cash Limit \$0
Available Credit \$0
Portion Available for Cash \$0
The Cash Limit is a portion of the Total Credit Limit

Previous Balance \$1,842.79
Payments & Credits 0.00
Purchases & Advances 0.00
Other Charges 0.00
FINANCE CHARGES 0.00

New Balance \$1,842.79

Amount Past Due \$1,842.79

Minimum Payment Due \$1,842.79
(includes any Amount Past Due)

Payment Due Date August 8, 2006

Questions? Call Us:

Target Credit Services 1-888-755-5856
TDD/TDY 1-800-347-5842
Outside the U.S. 11-612-307-8622 (Call Collect)

Calling will not preserve your billing-error rights

Payments & Credits

No payments or credits were received last month.

Finance Charges

Days in Billing Period: 30

Balance Type	Daily Periodic Rate	Corresponding Annual Percentage Rate	Average Daily Balance	Periodic FINANCE CHARGE	Transaction FINANCE CHARGE
Purchases	0.00000%	0.00%	\$0.00	\$0.00	\$0.00
Cash	0.00000%	0.00%	\$0.00	\$0.00	\$0.00
Total FINANCE CHARGES:					\$0.00
Actual ANNUAL PERCENTAGE RATE:					0.00%

Target National Bank, an affiliate of Target Stores

NOTICE: SEE REVERSE SIDE FOR IMPORTANT INFORMATION

INCLUDE THIS PORTION WITH YOUR PAYMENT MADE PAYABLE TO TARGET NATIONAL BANK



Account Number 4352-3766-9558-4409
New Balance \$1,842.79
Minimum Payment Due \$1,842.79
Payment Due Date August 8, 2006

NEW PHONE, HOME OR
E-MAIL ADDRESS?
PLEASE UPDATE ON
REVERSE SIDE.



TARGET NATIONAL BANK
P.O. BOX 59317
MINNEAPOLIS, MN 55459-0317

Amount
Enclosed \$

OFFICE COPY

STATEMENT PAGE NOT PRINTED

DONNA M MONACO
2 N 2ND ST
CLEARFIELD, PA 16830-2439



exhibit "A"
2050-11743

2000500184279018427990435237669558440971

In _____ Court

_____ Judicial (Circuit/District)

Original Creditor Name: TARGET NATIONAL BANK

Debtor Name: MONACO, DONNA M

Co-Debtor Name:

Account Number: 4352376695584409

AFFIDAVIT OF ACCOUNT

STATE OF MINNESOTA

COUNTY OF HENNEPIN

ss:

The undersigned, CHRISTIE COMES states that:

1. I am a representative of TARGET NATIONAL BANK and am authorized to Verify current balances due and owing to TARGET NATIONAL BANK on credit card accounts.
2. As of the date of this affidavit I have reviewed the records of the above listed person and account, and that the amount due and owing to TARGET NATIONAL BANK on this account, over and above all known legal set offs is \$1842.79.
3. That reasonable inquiry has been made to determine if the defendant is in the military service of the United States of America, and to the best of my knowledge that defendant is not in such military service and is therefore not entitled to the rights and privileges provided under the Soldiers and Sailors Civil Relief Act of 1940, as amended.

That the above information is true to the best of my knowledge, information and belief, and based upon the books and business records of TARGET NATIONAL BANK.



Authorized Agent of TARGET NATIONAL BANK

Subscribed and sworn to before

Me on 18th day of July, 2006


Notary public

My commission expires: 1/31/08

4352376695584409

A144 PATENAUDE & FELIX, A.P.C



2050.11743

The undersigned does hereby verify subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities, that she is, Christie Comes, Assistant Secretary, of Target National Bank, Plaintiff Herein, that she is duly authorized to make this Declaration, and hat the facts set forth in the foregoing Complaint in Civil Action are true and correct to the best of her knowledge, information and belief.

A handwritten signature in black ink, appearing to read 'Christie Comes', written over a horizontal line.

Christie Comes
Authorized Agent of Target National Bank/Target Visa

4352376695584409
A144
PATENAUDE & FELIX, A.P.C

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101937
NO: 06-1508-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: TARGET NATIONAL BANK
vs.
DEFENDANT: DONNA M. MONACO

SHERIFF RETURN

NOW, October 04, 2006 AT 9:00 AM SERVED THE WITHIN COMPLAINT ON DONNA M. MONACO DEFENDANT AT 4 N 2ND ST., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO DONNA M. MONACO, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: HUNTER / DEHAVEN

FILED

DEC 13 2006

William A. Shaw
Prothonotary/Clerk of Courts

FILED

DEC 13 2006

William A. Shaw
Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	PATENAUDE	8411	10.00
SHERIFF HAWKINS	PATENDAUDE	8411	20.00

FILED

DEC 13 2006

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

_____ Day of _____ 2006

So Answers,

Chester A. Hawkins
Liz Marilyn Hawkins

Chester A. Hawkins
Sheriff

GREGG L. MORRIS, ESQ.
PATENAUDE & FELIX, A.P.C.
213 E. MAIN STREET
CARNEGIE, PA 15106
(412) 429-7675
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PA ID#69006

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK

Plaintiff,

v.

DONNA M MONACO ,

Defendant(s).

)
)
) NO. 06-1508-CD
)
)
)
)
)
)
)

**P R A E C I P E F O R
D E F A U L T J U D G M E N T**

Filed on behalf of:
TARGET NATIONAL BANK ,
Plaintiff

Counsel of Record for This Party:

Gregg L. Morris, Esquire
Pa I.D. #69006

Patenaude & Felix, A.P.C.
213 East Main Street
Carnegie, PA 15106
(412) 429-7675

FILED ⁵
m 11:11 AM
JAN 04 2007
Attg. pd. 20.00
ICC Notice
to Def.
Statement
to Attg.
William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK ,)	
)	
Plaintiff)	NO. 06-1508-CD
)	
v.)	
)	
DONNA M MONACO ,)	
)	
Defendant(s))	
)	

PLAINTIFF'S PRAECIPE FOR DEFAULT JUDGMENT

TO: PROTHONOTARY

Please enter a judgment against the Defendant(s), above named, for failure to file an Answer to Plaintiff's complaint.

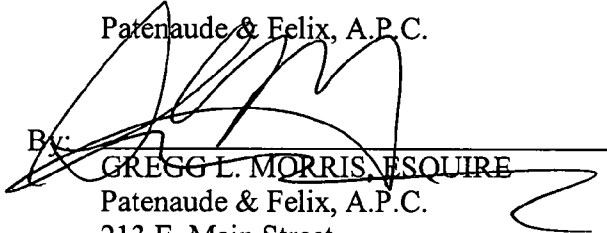
Amount claimed in Complaint	\$1,842.79
Interest from June 19, 2006	\$0.00
Attorney's fees	\$0.00
TOTAL	<u>\$1,842.79</u>

With continuing interest on the principal amount of \$1,842.79, with interest at the legal rate, plus costs of suit.

I hereby certify that a written notice of intention to file this praecipe was mailed to the Defendant(s) and Defendant(s) counsel (if known), after the default had occurred and at least ten (10) days prior to the date of the filing of this praecipe. A copy of the Notice is attached.

Patenaude & Felix, A.P.C.

By:


GREGG L. MORRIS, ESQUIRE
Patenaude & Felix, A.P.C.
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

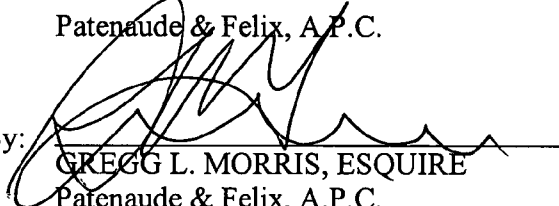
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

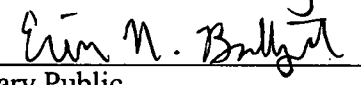
TARGET NATIONAL BANK ,)	
)	
Plaintiff)	NO. 06-1508-CD
)	
v.)	
)	
DONNA M MONACO ,)	
)	
Defendant(s))	
)	

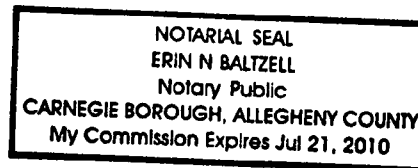
**PLAINTIFF'S AFFIDAVIT OF NON-MILITARY SERVICE AND MAILING OF
NOTICE PURSUANT TO PA.R.C.P. 1037(b)**

COMMONWEALTH OF PENNSYLVANIA)
COUNTY OF ALLEGHENY)

Before me, the undersigned authority, a Notary Public in and for said County and State, Personally appeared Gregg L. Morris, Attorney for and authorized representative of Plaintiff, who being duly sworn according to law, deposes and states that the Defendant(s), DONNA M MONACO , is not in the military service of the United States of America to the best of his knowledge, information and belief and certifies that Notice of Intent to take Default Judgment was mailed in accordance with Pa.R.C.P. 237.1, as evidenced by the attached copy.

Patenaude & Felix, A.P.C.
By: 
GREGG L. MORRIS, ESQUIRE
Patenaude & Felix, A.P.C.
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

Sworn to and subscribed before me
this 2 day of January 2007.

Notary Public



GREGG L. MORRIS, ESQ.
PATENAUE & FELIX, A.P.C.
213 E. MAIN STREET
CARNEGIE, PA 15106
(412) 429-7675
FACSIMILE (412) 429-7679
PA ID#69006

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK,

Plaintiff,

V.

DONNA M MONACO,

Defendant(s).

)
)
) NO. 06-1508-CD
)
)
)
)
)
)
)
)

IMPORTANT NOTICE

Filed on behalf of:
TARGET NATIONAL BANK ,
Plaintiff

Counsel of Record for This Party:

Gregg L. Morris, Esquire
Pa I.D. #69006

Patenaude & Felix, A.P.C.
213 East Main Street
Carnegie, PA 15106
(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK ,)	
)	
Plaintiff)	NO. 06-1508-CD
)	
v.)	
)	
DONNA M MONACO ,)	
)	
Defendant(s))	
)	

To: DONNA M MONACO
2 N 2ND ST
CLEARFIELD, PA 168302439

Date of Notice: December 18, 2006

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 NOTICE TO A 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.

David S. Meholic
Court Administration
Clearfield County Courthouse
Clearfield, PA 16830
814-765-2641

Patenaude & Felix, A.P.C.

By:


GREGG L. MORRIS, ESQUIRE

Patenaude & Felix, A.P.C.

213 E. Main Street

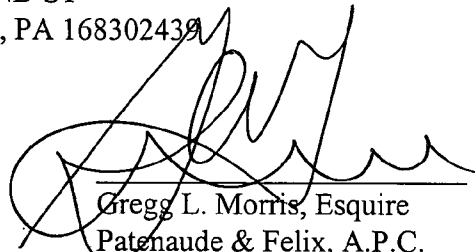
Carnegie, PA 15106

(412) 429-7675

I, GREGG L. MORRIS, attorney for Plaintiff, TARGET NATIONAL BANK ,
herby certify that a true and correct copy of the foregoing document was served this day
by US First Class Mail, postage prepaid upon the following:

DONNA M MONACO
2 N 2ND ST
CLEARFIELD, PA 168302439

Date: December 18, 2006

A handwritten signature in black ink, appearing to read 'Gregg L. Morris', is written over a horizontal line.

Gregg L. Morris, Esquire
Paternaude & Felix, A.P.C.
Attorneys for Plaintiff
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

FILED

JAN 04 2007

William A. Shaw
Prothonotary/Clerk of Courts

GREGG L. MORRIS, ESQ.
PATENAUE & FELIX, A.P.C.
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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK

Plaintiff,

V.

DONNA M MONACO,

Defendant(s).

)
)
)
)
)
)
)
)

NO. 06-1508-CD

**NOTICE OF ORDER,
DECREE OR JUDGMENT**

Filed on behalf of:
TARGET NATIONAL BANK ,
Plaintiff

Counsel of Record for This Party:

Gregg L. Morris, Esquire
Pa I.D. #69006

Patenaude & Felix, A.P.C.
213 East Main Street
Carnegie, PA 15106
(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

TARGET NATIONAL BANK ,

Plaintiff

v.

DONNA M MONACO ,

Defendant(s)

)
)
) NO. 06-1508-CD
)
)
)
)
)
)

COPIES

NOTICE OF ORDER, DECREE OR JUDGMENT

TO: () Plaintiff (X) Defendant () Garnishee () Additional Defendant

You are hereby notified that the following Order, Decree, or Judgment has been entered
against you on January 4, 2007

- () Decree Nisi in Equity
() Final Decree in Equity
(X) Judgment of () Confession () Verdict () Court Order
(X) Default () Non-suit
() Non-Pros () Arbitration Award

- (X) Judgment in the amount of \$1,842.79, plus cost.
() District Justice Transcript of Judgment in the amount of \$ _____,
plus costs.
() If not satisfied within sixty (60) days, your motor vehicle operator's license will be
suspended by the Department of Transportation.

Prothonotary

By William L. Hargis
Deputy

If you have questions concerning the above, please contact:

Name of Attorney: GREGG L. MORRIS, ESQUIRE
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

~~FILED~~

~~JAN 04 2007~~

~~William A. Shaw
Prothonotary/Clerk of Courts~~



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA
STATEMENT OF JUDGMENT

COY

Target National Bank
Plaintiff(s)

No.: 2006-01508-CD

Real Debt: \$1,842.79

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Donna M. Monaco
Defendant(s)

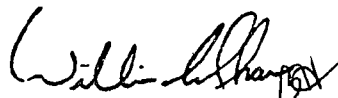
Entry: \$20.00

Instrument: Default Judgment

Date of Entry: January 4, 2007

Expires: January 4, 2012

Certified from the record this 4th day of January, 2007.



William A. Shaw, Prothonotary

SIGN BELOW FOR SATISFACTION

Received on _____, _____, of defendant full satisfaction of this Judgment,
Debt, Interest and Costs and Prothonotary is authorized to enter Satisfaction on the same.

Plaintiff/Attorney