

06-1752-CD
Citibank vs Brad Hoover

Citibank vs Brad Hoover
2006-1752-CD

Burton Neil & Associates, P.C.
By: Burton Neil, Esquire ID. NO. 11348
1060 Andrew Drive, Suite 170
West Chester, PA 19380
(610) 696-2120
Attorney for Plaintiff

CITIBANK (SOUTH DAKOTA) N.A. : IN THE COURT OF COMMON PLEAS
701 East 60th Street North, Sioux Falls, SD :
Plaintiff : CLEARFIELD COUNTY, PENNSYLVANIA
v. : NO. 2006-1752-CD

BRAD HOOVER
Rr 225, Penfield PA 158490161
Defendant : CIVIL ACTION - LAW

Complaint - 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 (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 claim 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. 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 REFERENCE AND INFORMATION SERVICE

David S. Meholick
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
Telephone No. 814-765-2641 Ext. 5982

C-10710

FILED pd \$85.00 A14
M/11:55 am ICC Shff
OCT 26 2006 (S)

William A. Shaw
Prothonotary/Clerk of Courts



Burton Neil & Associates, P.C.
By: Burton Neil, Esquire, I.D. No. 11348
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Attorney for Plaintiff

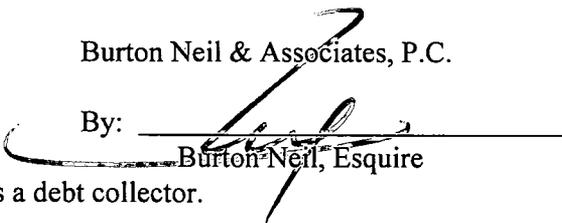
CITIBANK (SOUTH DAKOTA) N.A. : IN THE COURT OF COMMON PLEAS
701 East 60th Street North, Sioux Falls, SD
Plaintiff : CLEARFIELD COUNTY, PENNSYLVANIA
v. : NO.
BRAD HOOVER :
Rr 225, Penfield, PA Defendant : CIVIL ACTION - LAW

Complaint

1. Plaintiff is CITIBANK (SOUTH DAKOTA) N.A., with place of business located at 701 East 60th Street North, Sioux Falls, South Dakota.
2. Defendant is Brad Hoover, who resides at Rr 225, Penfield, Clearfield County, Pennsylvania.
3. Plaintiff is a national banking association, engaged in various types of banking business including consumer lending through the issuance of credit cards.
4. Plaintiff furnished consumer credit to the defendant by means of a(n) AT&T Universal credit card with account number 5491130377121181 hereinafter referred to as the credit card account.
5. Plaintiff kept accurate running records of all debits and credits to the account.
6. Plaintiff mailed to defendant monthly statements for the account including the billing statement attached hereto as Exhibit A. The monthly statements accurately stated the previous balance, the debits and credits to the account for the prior billing period.
7. Before plaintiff mailed Exhibit A, defendant had for many months made payments on account of the billing statement or retained the statement without payment.
8. Defendant's actions as set forth above constituted an account stated between parties for the sum of \$2,912.25 which sum reflects the Exhibit A statement balance less credits, if any, which were applied subsequent to the date of Exhibit A.

Wherefore, plaintiff demands judgment against defendant for the sum of \$2,912.25, and the costs of this action.

Burton Neil & Associates, P.C.

By: 
Burton Neil, Esquire

The law firm of Burton Neil & Associates, P.C. is a debt collector.

Your AT&T Universal Card Statement

July 25 - August 24, 2008



Page 1 of 3

BRAD HOOVER
Account 5491 1303 7712 1181
Calling Card + PIN
No Annual Fee/Platinum Card

How To Reach Us
Visit: www.universalcard.com
Customer Service: 1-800-423-4343 or write
Cardmember Services, PO Box 44167
Jacksonville, FL 32231-4167

Quick Reference

Minimum Payment Due..... **\$2,912.25**
Due Date*..... **September 19, 2008**
*Payment must be received by 5:00 pm local time on the payment due date.
Amount Past Due..... **\$474.69**
Amount Over Limit..... **\$712.25**
Credit Line..... **\$2,200.00**
Available Credit..... **\$0.00**
Cash Advance Limit..... **\$700.00**
Available Cash Advance Limit..... **\$0.00**

Help is available! Please call the toll-free number shown above to learn about our special payment options. Please give us the opportunity to assist you.

C-10710

Account Summary

Previous Balance..... **2,836.13**
Payments and Adjustments..... **0.00**
MasterCard® Activity..... **76.12**
Total AT&T Services..... **0.00**
New Balance..... **\$2,912.25**

Note: Detailed activity starts on page 3.

date paid amount paid check #

Please follow payment instructions outlined in the "Important Instructions for Making Payments" section of the statement.

05491130377121181291225999995917

Your Account Number
5491 1303 7712 1181

Payment Due Date
SEP 19 2006

Your Total Balance
\$2912.25

Minimum Amount Due
\$2912.25

Please Enter Amount of Payment Enclosed
\$

5115 MC 32 A 1 AR7051454

BRAD HOOVER
P.O. BOX 161
PENFIELD PA 15849-0161

AT&T UNIVERSAL CARD
PO BOX 183066
COLUMBUS, OH 43218-3066

EXHIBIT A

BRAD HOOVER
Account 5491 1303 7712 1181
July 25 - August 24, 2008



Page 2 of 3

In the return envelope, please:

- 1 Make your check payable to AT&T Universal Card.**
- 2 Enclose your check or money order. Include your account number and name on the front of your check or money order. Please, no cash or foreign currency.**
- 3 Enclose your payment coupon. Do not staple or tape it to your payment. Insert the payment coupon so that the entire AT&T Universal Card address appears through the window of your remittance envelope.**

BRAD HOOVER
 Account 5491 1303 7712 1181
 July 25 - August 24, 2006



AT&T UNIVERSAL MASTERCARD ACTIVITY

Purchases..... 76.12
 Cash Advances and Checks..... 0.00
Total MasterCard Activity..... \$78.12

PURCHASES

Total MasterCard Purchases..... \$76.12

Standard Purch

Trans	Post	Description	Amount
	08/24	PURCHASES*FINANCE CHARGE*PERIOD	9.78
Total Standard Purch			\$9.78

Purch/CashAdv 05/24/2005

Trans	Post	Description	Amount
	08/24	PURCHASES*FINANCE CHARGE*PERIOD	66.34
Total Purch/CashAdv 05/24/2005			\$66.34

CASH ADVANCES

Cash Advance Limit..... \$700.00* *This represents a portion of your total credit line.

FINANCE CHARGE INFORMATION

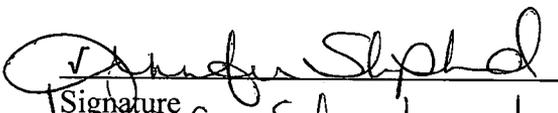
	Nominal APR	Periodic Rate	Days In Billing Period	x	Balance Subject to Finance Charge	=	Periodic FINANCE CHARGE	+	Transaction Fee/FINANCE CHARGE	=	ANNUAL PERCENTAGE RATE
PURCHASES											
Standard Purch	32.240%	.08833%(D)	x 30	x	\$369.20	=	\$9.78	+	\$0.00	=	32.240%
Purch/CashAdv thru 05/24/05	32.240%	.08833%(D)	x 30	x	\$2,503.56	=	\$66.34	+	\$0.00	=	32.240%
CASH ADVANCES											
Standard Adv	32.240%	.08833%(D)	x 30	x	\$0.00	=	\$0.00	+	\$0.00	=	32.240%
							Total FINANCE CHARGE	=	\$76.12		

AT&T SERVICES SUMMARY

AT&T Universal Calling Card Calls..... \$0.00

Verification

I, Jennifer Shepherd am an employee of Citicorp Credit Services, Inc., (USA) which is by contract the service provider for plaintiff CITIBANK (SOUTH DAKOTA) N.A. retained to perform services including but not primarily limited to collecting delinquent debt. I am authorized to make this verification as attorney-in-fact for plaintiff under powers of attorney from plaintiff to Citicorp Credit Services, Inc. (USA) and to me. The foregoing averments of fact in the within pleading are true and correct to the best of my knowledge, information and belief. I understand that the statements made herein are subject to the penalties of 18 Pa. C.S. Section 4904, relating to unsworn falsification to the authorities.


Signature
Jennifer Shepherd
September 26, 2006

Brad Hoover
5491130377121181

Documents for Filing

OUR FILE: C-10710
DATE: October 20, 2006

TO: Clearfield County Prothonotary
1 North Second Street
Clearfield, PA 16830

RE: CITIBANK (SOUTH DAKOTA) N.A. v. Brad Hoover

The following is enclosed for filing: Complaint

- Please file the original
- Return a time-stamped copy to us in the envelope provided
- Forward all remaining documents to the Sheriff for processing.

Our check for your fee is enclosed.

Thank you,

Burton Neil & Associates, P.C.
1060 Andrew Drive, Suite 170
West Chester, PA 19380
610-696-2120

P \$85.00
S \$100.00

Burton Neil & Associates, P.C.
By: Burton Neil, Esquire ID. NO. 11348
1060 Andrew Drive, Suite 170
West Chester, PA 19380
610-696-2120
Attorney for Plaintiff

CITIBANK (SOUTH DAKOTA) N.A. : IN THE COURT OF COMMON PLEAS
Plaintiff : CLEARFIELD COUNTY, PENNSYLVANIA
v. :
BRAD HOOVER : NO. 2006-1752-CD
Defendant : CIVIL ACTION - LAW

Praecepte to Discontinue

To the Prothonotary:

Kindly discontinue the above-captioned action without prejudice.

Burton Neil & Associates, P.C.

By: 

Burton Neil, Esquire
Attorney for Plaintiff

FILED *1cc'd 1 cert
of disc issued
M/2:30pm to Atty*
JAN -8 2007 *(initials)*

The law firm of Burton Neil & Associates is a debt collector.

William A. Shaw
Prothonotary/Clerk of Courts

C-10710



Burton Neil
Edward J. O'Brien
Yale D. Weinstein
Derek C. Blasker
Brit J. Suttell
Neil Sarker

LAW OFFICES
BURTON NEIL & ASSOCIATES, P.C.
1060 ANDREW DRIVE, SUITE 170
WEST CHESTER, PENNSYLVANIA 19380
610-696-2120
Facsimile 610-696-4111
Email: Burton.Neil@burt-law.com
January 5, 2007

Refer to File #
C-10710

Clearfield County Prothonotary
1 North Second Street
Clearfield, PA 16830

RE: Citibank South Dakota, NA v. Brad Hoover
Docket No. 2006-1752-CD

Documents for Filing

Enclosed please find a Praecipe to Discontinue for filing. Please file the original and return a copy to our office in the enclosed envelope. A check for your fees is enclosed.

Burton Neil & Associates, P.C.

Enclosure
Check

The law firm of Burton Neil & Associates is a debt collector.

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

COPY

Citibank (South Dakota) N.A.

Vs.

No. 2006-01752-CD

Brad Hoover

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 January 8, 2007, marked:

Discontinued

Record costs in the sum of \$85.00 have been paid in full by Burton Neil Esq..

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 8th day of January A.D. 2007.



William A. Shaw, Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102069
NO: 06-1752-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: CITIBANK (SOUTH DAKOTA) N.A.
vs.
DEFENDANT: BRAD HOOVER

FILED
03:18 PM
FEB 02 2007
William A. Shaw
Prothonotary/Clerk of Courts

SHERIFF RETURN

NOW, November 01, 2006 AT 2:55 PM SERVED THE WITHIN COMPLAINT ON BRAD HOOVER DEFENDANT AT 52 IRVEN LN., PENFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO BECKY HOOVER, WIFE A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: NEVLING / COUDRIET

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	NEIL	26682	10.00
SHERIFF HAWKINS	NEIL	26682	32.24

Sworn to Before Me This

_____ Day of _____ 2007

So Answers,



Chester A. Hawkins
Sheriff