

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.
701 East 60th Street North, Sioux Falls, SD
Plaintiff
v.

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

: NO. 2006-1813-CD

KAREN L WISE
1040 Schuckers Orchard Road
Luthersburg PA 15848-2316
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. Meholic
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
Telephone No. 814-765-2641 Ext. 5982

FILED pt \$85.00 AH
M/2:25cm KCSHft
NOV - 3 2006

William A. Shaw
Prothonotary/Clerk of Courts

C-10604



Burton Neil & Associates, P.C.
By: Burton Neil, Esquire, I.D. 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.
KAREN L WISE :
1040 Schuckers Orchard Road, Luthersburg 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 Karen L Wise, who resides at 1040 Schuckers Orchard Road, Luthersburg, 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.

Count I

4. Plaintiff furnished consumer credit to the defendant by means of a credit card with account number 5424180156939768 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 \$2,759.61 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 \$2,759.61, and the costs of this action.

Count II

9. Plaintiff furnished consumer credit to the defendant by means of a(n) AT&T Universal credit card with account number 5491130006951156 hereinafter referred to as the credit card account.

10. Plaintiff kept accurate running records of all debits and credits to the account.

11. Plaintiff mailed to defendant monthly statements for the account including the billing statement attached hereto as Exhibit B. The monthly statements accurately stated the previous balance, the debits and credits to the account for the prior billing period.

12. Before plaintiff mailed Exhibit B, defendant had for many months made payments on account of the billing statement or retained the statement without payment.

13. Defendant's actions as set forth above constituted an account stated between parties for the sum of \$18,713.40 which sum reflects the Exhibit B statement balance less credits, if any, which were applied subsequent to the date of Exhibit B.

Wherefore, plaintiff demands judgment against defendant for the sum of \$18,713.40, 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.

09/01/06 \$2759.61 \$206.69
 PMT DUE DATE NEW BALANCE MIN AMT DUE

SITE:KC-CL TM:CO-5000 ACID:ROB0554
 09/06/06 22:12:17:

KAREN L WISE
 1040 SCHUCKERS ORCHARD R
 LUTHERSBURG PA
 15848-2316000

CITI CARDS
 PO BOX 183054
 COLUMBUS, OH
 43218-3054

C-10604

Citi® Dividend Platinum Select® Card



Account Number
 5424 1801 5693 9768

Customer Service:

1-800-388-2200
 BOX 6500
 SIOUX FALLS, SD 57117
 Statement/Closing Date 08/08/2006
 Total Credit Line \$3330
 Available Credit Line \$0
 Amount Over Credit Line \$0.00 +
 Cash Advance Limit \$300
 Past Due \$125.79 +
 Available Cash Limit \$0
 Purch/Adv Minimum Due \$80.90 =
 New Balance \$2759.61
 Minimum Amount Due \$206.69

| Sale Date | Post Date | Reference Number | Activity Since Last Statement | Amount |
|-----------|-----------|------------------|--|------------|
| | 8/08 | | Standard Purch | |
| | 8/08 | | LATE FEE - JUL PAYMENT PAST DUE | 35.00 |
| | | | 66 0000 | 0000000000 |
| | | | PURCHASES*FINANCE CHARGE*PERIODIC RATE | 75.90 |
| | | | 84 0000 | 0000000000 |

Your account is two months past due and your credit privileges have been discontinued. Please call the toll-free number shown above, Monday - Friday, 7 am to 9 pm, or Saturday, 8 am to 5 pm, Central Time. If you have already sent us this payment, thank you.

EXHIBIT

A

| Account Summary | Previous Balance | (+) Purchases & Advances | (-) Payments & Credits | (+) FINANCE CHARGE | (=) New Balance |
|-----------------|------------------|--------------------------|------------------------|--------------------|-----------------|
| PURCHASES | \$2,648.71 | \$35.00 | \$0.00 | \$75.90 | \$2,759.61 |
| ADVANCES | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| TOTAL | \$2,648.71 | \$35.00 | \$0.00 | \$75.90 | \$2,759.61 |

Days This Billing Period: 32

| Rate Summary | Balance Subject to Finance Charge | Periodic Rate | Nominal APR | ANNUAL PERCENTAGE RATE |
|----------------|-----------------------------------|---------------|-------------|------------------------|
| PURCHASES | | | | |
| Standard Purch | \$2,685.30 | 0.08833%(D) | 32.240% | 32.240% |
| ADVANCES | | | | |
| Standard Adv | \$0.00 | 0.08833%(D) | 32.240% | 32.240% |

Your AT&T Universal Card Statement

July 11 - August 10, 2006



Page 1 of 3

KAREN L WISE

Account 5491 1300 0695 1156

Calling Card + PIN

No Annual Fee/Platinum Card

How To Reach Us

Visit: www.universalcards.com

Customer Service: 1-800-423-4343 or write

Cardmember Services, PO Box 44167

Jacksonville, FL 32231-4167

Quick Reference

Minimum Payment Due..... \$18,713.40
Due Date..... September 5, 2006

*Payment must be received by 5:00 pm local time on the payment due date.

Amount Past Due..... \$1,838.01

Credit Line..... \$19,020.00

Available Credit..... \$0.00

Cash Advance Limit..... \$10,000.00

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.

Account Summary

Previous Balance..... 18,250.02

Payments and Adjustments..... 0.00

MasterCard® Activity..... 463.38

Total AT&T Services..... 0.00

New Balance..... \$18,713.40

Note: Detailed activity starts on page 3.

C-10609

date paid amount paid check #

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

05491130006951156999999999995914

Your Account Number

5491 1300 0695 1156

Please Enter Amount of Payment Enclosed

Payment Due Date

SEP 05 2006

Your Total Balance

\$18713.40

Minimum Amount Due

\$18713.40

\$

550N MC 32 R 1 AR7851447

|||||

KAREN L WISE

1040 SCHUCKERS

ORCHARD RD

LUTHERSBURG PA 15848

|||||

AT&T UNIVERSAL CARD

PO BOX 183056

COLUMBUS, OH 43218-3056

|||||

EXHIBIT

B

KAREN L WISE
Account 5491 1300 0885 1156
July 11 - August 10, 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.**

KAREN L WISE
Account 6491 1300 0696 1166
July 11 - August 10, 2006



Page 3 of 3

AT&T UNIVERSAL MASTERCARD ACTIVITY

Purchases..... 370.31
Cash Advances and Checks..... 58.07
Fees..... 35.00
Total MasterCard Activity..... \$463.38

PURCHASES

Total MasterCard Purchases..... \$370.31

Standard Purch

| Trans | Post | Description | Amount |
|----------------------|-------|---------------------------------|----------|
| | 08/10 | PURCHASES*FINANCE CHARGE*PERIOD | 370.31 |
| Total Standard Purch | | | \$370.31 |

CASH ADVANCES

Cash Advance Limit..... \$10,000.00* *This represents a portion of your total credit line.

Total Cash Advances..... \$58.07

Standard Adv

| Trans | Post | Description | Amount |
|--------------------|-------|--------------------------------|---------|
| | 08/10 | ADVANCES*FINANCE CHARGE*PERIOD | 58.07 |
| Total Standard Adv | | | \$58.07 |

FINANCE CHARGE INFORMATION

| | Nominal APR | Periodic Rate | Days in x Billing Period | Balance Subject to Finance Charge | = | Periodic FINANCE CHARGE | + Fee/FINANCE CHARGE | ANNUAL PERCENTAGE RATE |
|----------------------|----------------|------------------|--------------------------------|---|---|-------------------------------|-------------------------|------------------------------|
| PURCHASES | | | | | | | | |
| Standard Purch | 28.240% | .07737%(D) | x 30 | x \$15,854.21 | = | \$370.31 | + | \$0.00 |
| CASH ADVANCES | | | | | | | | |
| Standard Adv | 28.240% | .07737%(D) | x 30 | x \$2,502.04 | = | \$58.07 | + | \$0.00 |
| Total FINANCE CHARGE | | | | | | = | \$428.38 | |

FEES

Standard Purch

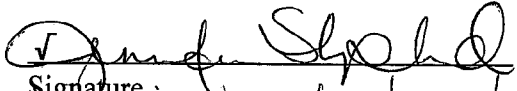
| Trans | Post | Description | Amount |
|------------|-------|---------------------------------|---------|
| | 08/10 | LATE FEE - JUL PAYMENT PAST DUE | 35.00 |
| Total Fees | | | \$35.00 |

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 29, 2006

Karen L Wise
5424180156939768

Documents for Filing

OUR FILE: C-10604
DATE: October 31, 2006

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

RE: CITIBANK (SOUTH DAKOTA) N.A. v. Karen L Wise

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

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102095
NO: 06-1813-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: CITIBANK (SOUTH DAKOTA) N.A.
vs.
DEFENDANT: KAREN L. WISE

SHERIFF RETURN

NOW, November 08, 2006 AT 1:30 PM SERVED THE WITHIN COMPLAINT ON KAREN L. WISE DEFENDANT AT 1040 SCHUCKERS ORCHARD ROAD, LUTHERSBURG, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO GLENN QUICK, HUSBAND 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 | 27034 | 10.00 |
| SHERIFF HAWKINS | NEIL | 27034 | 33.13 |

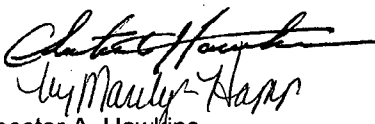
FILED
92:202m
FEB 06 2007

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

_____ Day of _____ 2007

So Answers,


Chester A. Hawkins
Sheriff

CITIBANK (SOUTH DAKOTA) N.A.
701 East 60th Street N, Sioux Falls, SD 57117
Plaintiff

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

v.

: NO. 2006-1813-CD

KAREN L WISE
1040 Schuckers Orchard Road
Luthersburg PA 15848-2316
Defendant

: CIVIL ACTION - LAW

FILED
FEB 20 2007
m/225/lls
William A. Shaw
Prothonotary/Clerk of Courts
NOTED TO DEPT

Praecept for Default Judgment

To the Prothonotary:


Please enter judgment by default for want of an answer in the above case in favor of the plaintiff and against the defendant, and assess damages as follows:

| | |
|-----------------------|--------------------|
| Principal - Count I: | \$2,759.61 |
| Principal - Count II: | \$18,713.40 |
| TOTAL | \$21,473.01 |

Understanding that false statements herein made are subject to penalty under 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities, I verify that:

1. The above are the precise last-known addresses of the judgment debtor and creditor.
2. The annexed notice of intention to file this praecipe was mailed to all parties against whom judgment is to be entered and to their record attorneys, if any, after the default occurred, and at least ten days prior to the date of the filing of this praecipe.
3. Pursuant to Section 201(b)(1)(A) of the Servicemembers Civil Relief Act of 2003 (SCRA), the defendant is not in the military service of the United States based on information received from the defendant and/or the Department of Defense website.

**JUDGMENT BY DEFAULT ENTERED
AND DAMAGES ASSESSED AS ABOVE.
NOTICE GIVEN UNDER P.A.R.CIV.P. 236**



Pro Prothonotary

Burton Neil & Associates, P.C.

By: 

Burton Neil, Esquire
Attorney for Plaintiff
I.D. #11348
1060 Andrew Drive, Suite 170
W. Chester, PA 19380

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

C-10604

CITIBANK (SOUTH DAKOTA) N.A.

: IN THE COURT OF COMMON PLEAS

Plaintiff

: CLEARFIELD COUNTY, PENNSYLVANIA

v.

: NO. 2006-1813-CD

KAREN L WISE

Defendant

: CIVIL ACTION - LAW

Notice of Intention to File Praecipe for Default Judgment

TO: Karen L Wise
1040 Schuckers Orchard Road
Luthersburg PA 15848-2316

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 obligations to the claims set forth against you. Unless you act within ten (10) 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 your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the following office 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

DATE OF NOTICE: January 31, 2007

Burton Neil & Associates, P.C.

By: Burton Neil, Esquire
Attorney for Plaintiff

Identification No. 11348

1060 Andrew Drive, Suite 170

West Chester, PA 19380

(610) 696-2120

In making this communication, we advise our office is a
debt collector.



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.
Plaintiff

v.

KAREN L WISE
Defendant

: IN THE COURT OF COMMON PLEAS
:
: CLEARFIELD COUNTY, PENNSYLVANIA
:
: NO. 2006-1813-CD
:
: CIVIL ACTION - LAW

Rule of Civil Procedure NO. 236 (Revised)

Notice is given that a JUDGMENT in the above captioned matter has been entered against you on

FEB. 20, 2007

Prothonotary

By: 

~~Deputy~~

If you have any questions concerning the above, please contact:

Burton Neil, Esquire
Attorney for Party Filing
1060 Andrew Drive, Suite 170
West Chester, PA 19380
Phone: 610-696-2120

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

