

07-76-CD
Discover Bank vs Molly Wilson

Discover Bank vs Molly Wilson
2007-76-CD

Our File No. 243487
ATTORNEYS FOR PLAINTIFF
ERIC M. BERMAN, P.C.
BY: Eric M. Berman, Esquire, I.D. 83698
BY: Robert M. Kline, Esquire, I.D. 56479
500 North Gulph Road, Suite 350
King of Prussia, PA 19406
(610) 265-7720

COURT OF COMMON PLEAS
COUNTY OF CLEARFIELD

DISCOVER BANK

c/o ERIC M. BERMAN, P.C. : TRIAL DIVISION
500 North Gulph Road, Suite 350 : CIVIL ACTION
King of Prussia, PA 19406 :
VS. : No. 07-76-CD

MOLLY WILSON

FILED *Att'y pd.*
MAY 24 2007 20.00
JUN 11 2007 *cc: 111*

William A. Shaw to Def.
Prothonotary/Clerk of Courts

Statement
to Atty
(GK)

PRAECIPE TO ENTER DEFAULT JUDGMENT

TO THE PROTHONOTARY:

Please enter a default judgment in favor of Plaintiff,
DISCOVER BANK,
and against Defendant, MOLLY WILSON ,
for failure to answer or otherwise respond to the Complaint - Civil
Action.

The Complaint was served upon Defendant on 01/18/2007, by the Sheriff's Office of COUNTY OF CLEARFIELD County.

A copy of the Notice of Intention to Take Default served upon the Defendant by regular mail on May 25, 2007 is attached hereto as Exhibit B.

I certify that written notice of the intention to file this Praeclipe was mailed or delivered to the party against whom judgment is to be entered after the default occurred and at least ten days prior to the date of the filing of this Praeclipe. Copies are attached. R.C.P.237.1.

Assess damages in the principal amount of \$3,816.54, being the amount demanded in the Complaint, together with attorneys fees and court costs.

ERIC M. BERMAN, P.C.
Attorneys for Plaintiff
By: Eric M. Berman, Esquire

ERIC M. BERMAN, P.C.
Attorneys for Plaintiff
By: Robert M. Kline, Esquire

SPACEJUB - ZH

Our File No. 243487
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COURT OF COMMON PLEAS
COUNTY OF CLEARFIELD

DISCOVER BANK

c/o ERIC M. BERMAN, P.C. : TRIAL DIVISION
500 North Gulph Road, Suite 350 :
King of Prussia, PA 19406 : CIVIL ACTION
vs. : No. 07-76

MOLLY WILSON

-X

NOTICE OF INTENTION TO TAKE DEFAULT JUDGMENT

TO: MOLLY WILSON
1217 S MAIN ST
DU BOIS, PA 15801-1129

DATE OF NOTICE: May 25, 2007

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 NOTICE 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.

COUNTY OF CLEARFIELD BAR ASSOCIATION
P.O. BOX 186
HARRISBURG, PA 17108
800-692-7375


ERIC M. BERMAN, P.C.
Attorneys for Plaintiff
By: Eric M. Berman, Esquire


ERIC M. BERMAN, P.C.
Attorneys for Plaintiff
By: Robert M. Kline, Esquire

SPACEJUD-ZH

Our File No. 243487
ATTORNEYS FOR PLAINTIFF
ERIC M. BERMAN, P.C.

By: Eric M. Berman, Esquire, I.D. 8369
By: Robert M. Kline, Esquire, I.D. 5647
500 North Gulph Road, Suite 350
King of Prussia, PA 19406
(610) 265-7720

-----X-----
DISCOVER BANK : COURT OF COMMON PLEAS
: COUNTY OF CLEARFIELD
c/o ERIC M. BERMAN, P.C. : TRIAL DIVISION
500 North Gulph Road, Suite 350 : CIVIL ACTION
King of Prussia, PA 19406 :
: vs. : No. 07-76
: :
MOLLY WILSON :
-----X-----

CERTIFICATION OF NON-MILITARY SERVICE

I am one of Plaintiff's attorneys and am authorized to make this certification on Plaintiff's behalf.

The above named Defendant(s) is (are) over 18 years of age and reside at 1217 S MAIN ST , DU BOIS, PA 15801 1129.

The occupation of the Defendant(s) is (are) unknown.

The Defendant(s) is (are) not in the Military Service of the United States, nor any State or Territory thereof or its allies as defined in the Soldiers' and Sailors' Civil Relief Act of 1940 and the amendments thereto.

I verify that the statements made in the foregoing certification are true and correct to the best of my knowledge, information and belief, and I understand that the statements in said certification are made subject to the penalties of Pa.C.S. 4904 relating to unsworn falsification to authorities.



ERIC M. BERMAN, ESQUIRE
ATTORNEY FOR PLAINTIFF
SPACEJUB-ZK



ROBERT M. KLINE, ESQUIRE
ATTORNEY FOR PLAINTIFF

Our File No. 243487
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BY: Eric M. Berman, Esquire, I.D. 8369
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500 North Gulph Road, Suite 350
King of Prussia, PA 19406
(610) 265-7720

COURT OF COMMON PLEAS
COUNTY OF CLEARFIELD

DISCOVER BANK

c/o ERIC M. BERMAN, P.C. : TRIAL DIVISION
500 North Gulph Road, Suite 350 : CIVIL ACTION
King of Prussia, PA 19406 :
vs. : NO. 07-76

MOLLY WILSON

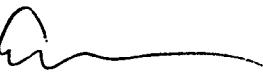
-----X

CERTIFICATION OF ADDRESSES

TO THE PROTHONOTARY:

The address of the Plaintiff, Judgment Creditor, is c/o
Eric M. Berman, P.C., 500 North Gulph Road, Suite 350, King of
Prussia, PA 19406.

The last known address of the Defendant, Judgment Debtor, is
1217 S MAIN ST , DU BOIS, PA 15801 1129.


Eric M. Berman, P.C.
Attorneys for Plaintiff
By: Eric M. Berman, Esquire
SPACEJUB-ZH


Eric M. Berman, P.C.
Attorneys for Plaintiff
By: Robert M. Kline, Esquire

Our File No. 243487
ATTORNEYS FOR PLAINTIFF
ERIC M. BERMAN, P.C.
By: Eric M. Berman, Esquire, I.D. 83698
By: Robert M. Kline, Esquire, I.D. 56479
500 North Gulph Road, Suite 350
King of Prussia, PA 19406
(610) 265-7720

COPY

-----X-----
DISCOVER BANK : COURT OF COMMON PLEAS
c/o ERIC M. BERMAN, P.C. : COUNTY OF CLEARFIELD
500 North Gulph Road, Suite 350 : TRIAL DIVISION
King of Prussia, PA 19406 : CIVIL ACTION
VS. : No. 07-76-CD
MOLLY WILSON :
-----X-----

TO: MOLLY WILSON
1217 S MAIN ST
DU BOIS, PA 15801-1129

NOTICE

Pursuant to Rule 236 of the Supreme Court of Pennsylvania, you are hereby notified that a JUDGMENT BY DEFAULT has been entered against you in the above proceeding and that enclosed herewith is a copy of all the (record) documents filed in support of the said JUDGMENT.

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE, PLEASE CALL:
ERIC M. BERMAN, P.C., Attorneys at Law.

Attention: Eric M. Berman, Esquire, or Robert M. Kline, Esquire,
at this telephone number. 1-610-265-7720.

Willie M. Shar 6/11/07
PROTHONOTARY

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

Discover Bank
Plaintiff(s)

No.: 2007-00076-CD

COPY

Real Debt: \$3,816.54

Atty's Comm: \$

Vs.

Costs: \$

Molly Wilson
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: June 11, 2007

Expires: June 11, 2012

Certified from the record this 11th day of June, 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

Our File No. 243487
ATTORNEYS FOR PLAINTIFF
ERIC M. BERMAN, P.C.
BY: Eric M. Berman, Esquire, I.D. 83698
BY: Robert M. Kline, Esquire, I.D. 56479
500 North Gulph Road, Suite 350
King of Prussia, PA 19406
(484) 690-3900

FILED Atty pd 85.00
MTI:48761 JAN 16 2007 ICC Sheriff
JAN 16 2007 ICC Atty
William A. Shaw
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS
COUNTY OF CLEARFIELD

DISCOVER BANK

c/o ERIC M. BERMAN, P.C.
500 North Gulph Road, Suite 350
King of Prussia, PA 19406

: TRIAL DIVISION
: CIVIL ACTION

vs.

: _____ Term _____

MOLLY WILSON
1217 S MAIN ST
DU BOIS, PA 15801 1129

-----X No. 07-76-CD

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 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 this complaint or for any other claim or relief required 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 OR FIND OUT WHERE YOU CAN GET LEGAL HELP.

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plaza al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. A demas la corte puede decidir a favor del demandante y requiere que usted compla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATEMENTE. SI NO TIENE ABOGA O SO NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO. VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

LAWYER REFERRAL SERVICE, COUNTY OF CLEARFIELD BAR ASSOCIATION
Add.: P.O. BOX 186, HARRISBURG, PA 17108 Tel.: 800-692-7375

Our File No. 243487

ATTORNEYS FOR PLAINTIFF

ERIC M. BERMAN, P.C.

BY: Eric M. Berman, Esquire, I.D. 83698

BY: Robert M. Kline, Esquire, I.D. 56479

500 North Gulph Road, Suite 350

King of Prussia, PA 19406

(610) 265-7720

-----X COURT OF COMMON PLEAS

: COUNTY OF CLEARFIELD

DISCOVER BANK

c/o ERIC M. BERMAN, P.C.

500 North Gulph Road, Suite 350

King of Prussia, PA 19406

: CIVIL ACTION

Term _____

: NO.

vs.

: _____

MOLLY WILSON

1217 S MAIN ST

DU BOIS, PA 15801 1129

-----X

COMPLAINT

1. Plaintiff, DISCOVER BANK ,
is a DELAWARE STATE BANK

authorized to do business in the Commonwealth of Pennsylvania with
its place of business at 6500 NEW ALBANY ROAD, NEW ALBANY, OH 43054.

2. The Defendant(s), MOLLY WILSON ,
resides at 1217 S MAIN ST , DU BOIS, PA 15801-1129.

3. There is due from the Defendant(s) the sum of \$3,816.54 for
credit extended by Plaintiff to Defendant(s), acct. no. 6011002220559512,
and which such credit was drawn and used by the Defendant(s).
Defendant(s) is in default for failure to make payments for such use.

4. The Plaintiff has made demand upon the Defendant(s) for payment
of monies in the sum of \$3,816.54 advanced to Defendant(s) through
Defendant(s) use of the above-referenced credit account, but Defendant(s)
has failed and refused to pay the said sum or any part thereof.

5. All applicable credits, if any, have been duly applied to
Defendant(s) credit account.

WHEREFORE, Plaintiff claims of the Defendant(s) the sum of \$3,816.54
plus interest, attorneys fees and costs which are justly due and
owing from the Defendant(s) to the Plaintiff.

ERIC M. BERMAN, P.C.

Dated: DECEMBER 15, 2006

BY: _____

ERIC M. BERMAN, ESQUIRE

BY: _____

ROBERT M. KLINE ESQUIRE

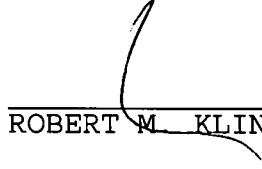
VERIFICATION

Eric M. Berman, Esquire, being duly sworn according to law, deposes and says that he is the Principal attorney of Eric M. Berman, P.C., attorneys for the Plaintiff, and/or Robert M. Kline, Esquire, being duly sworn according to law, deposes and says that he is an associate attorney with said firm, and as said attorney, is authorized to take this verification on its behalf, and that the facts in the Complaint as set forth therein are true and correct to the best of his knowledge, information and belief.

I verify that the statements made in the within instrument are true and correct. I understand that false statements are subject to the penalties of 18 Pa C.S.A. Section 4904 relating to unsworn falsifications to authorities.



ERIC M. BERMAN, ESQUIRE



ROBERT M. KLINE, ESQUIRE

Dated: DECEMBER 15, 2006

SPACEBNW-ZN

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102346
NO: 07-76-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: DISCOVER BANK
vs.
DEFENDANT: MOLLY WILSON

SHERIFF RETURN

NOW, January 18, 2007 AT 11:30 AM SERVED THE WITHIN COMPLAINT ON MOLLY WILSON DEFENDANT AT 1217 S. MAIN ST., DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO MOLLY WILSON, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: COUDRIET /

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	BERMAN	26886	10.00
SHERIFF HAWKINS	BERMAN	26886	36.43

FILED
09:00 AM
APR 25 2007
SJC

Sworn to Before Me This

____ Day of _____ 2007

So Answers, William A. Shaw
Prothonotary/Clerk of Courts

Chester A. Hawkins
Dee Marly Hask
Chester A. Hawkins
Sheriff