

07-143-CD
Capital One vs William J. Dixon

Capital One Bank vs William Dixon
2007-143-CD

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

CAPITAL ONE BANK,)
Plaintiff,) NO. 07-143-CD
v.)
WILLIAM J DIXON,)
Defendant(s).)

COMPLAINT IN CIVIL ACTION

Filed on behalf of:
CAPITAL ONE 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
MTH:00001
JAN 29 2007 JCC Sheriff

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

CAPITAL ONE BANK,)
Plaintiff,) NO.
v.)
WILLIAM J DIXON ,)
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.**

Lawyer Referral Service
Pennsylvania Lawyer Referral Services
Pennsylvania Bar Association
P.O. Box 1846
Harrisburg, PA 17108

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

CAPITAL ONE BANK,)
)
Plaintiff) NO.
)
v.)
)
WILLIAM J DIXON ,)
)
Defendant.)
)

COMPLAINT IN CIVIL ACTION

AND NOW, comes Plaintiff, CAPITAL ONE 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, CAPITAL ONE 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 WILLIAM J DIXON , an adult individual, believed to currently reside at 416 E. LOCUST ST. , CLEARFIELD, PA 16830-2460.
3. Defendant(s) obtained extensions of credit on the following open ended credit card account issued by CAPITAL ONE BANK being Account No. 4862362384128875 , for the purchase of goods and services.

4. The Defendant(s) made payments, but has refused to pay, and now refuses to pay the balance due and owing on the aforesaid account in the said sum of \$1,299.89, plus interest and costs. An Affidavit of a representative of CAPITAL ONE BANK is attached hereto as Plaintiff's Exhibit "A" and is incorporated herein by reference.

WHEREFORE, Plaintiff demands Judgment in its favor, and against Defendant, in the amount of \$1,299.89, plus interest as attached hereto, with continuing interest thereon at the legal rate from the date of Judgment plus costs.

Respectfully Submitted:

Patenaude & Felix, A.P.C.



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

762.4279 PA

STATE OF GEORGIA

COUNTY OF GWINNETT

Personally appeared before me HENDERSON W MCKENZIE II, who being duly sworn, made oath that he/she is an authorized agent of CAPITAL ONE BANK, and that he/she is authorized to make this affidavit, and to the best of his/her knowledge and belief, DIXON, WILLIAM J is/are justly indebted to CAPITAL ONE BANK in the sum of \$1665.11 Dollars as of 10/07/2006 with 25.90% interest from said date, and reasonable attorney fees, and that the annexed account which is made part hereof is a true and correct statement of said indebtedness. To the best of my knowledge, none of the above named defendant(s) is/are active duty in the military service of the United States or any of its allies as defined in the Soldiers and Sailor's Relief Act of 1940 with amendments.

Given under my hand this 8th day of November, 2006.

Affiant


Maisha Davis

Taken, subscribed and sworn to before me, _____
Notary Public in and for the City/County and State aforesaid, in my City/County
aforesaid this 8th day of November, 2006.

MAISHA DAVIS
HENRY COUNTY, GEORGIA
MY COMMISSION EXPIRES
OCTOBER 24TH, 2010


Notary Public

My commission expires on _____

A144

PATENAUME & FELIX, A.P.C
4862362384128875

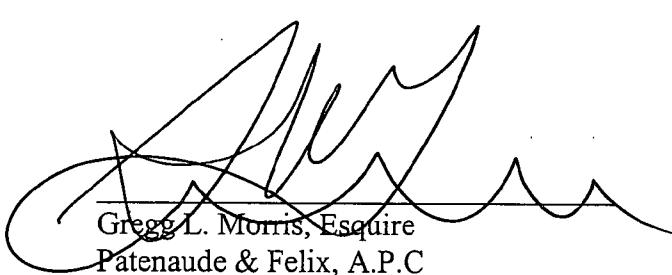
Exhibit "A"

VERIFICATION

AND NOW, Gregg L. Morris, verifies the statements made in this Complaint that are true and correct to the best of his knowledge, information and belief. I understand that false statements herein are made subject to the penalties of Pa.C.S. Section 4904, relating to unsworn falsification to authorities.

By virtue of the fact that the Plaintiff is outside the jurisdiction of the Court and the verification cannot be obtained within the time allowed for the filing of this pleading, the pleading is submitted by counsel having sufficient knowledge, information and belief based upon the information provided by him by the Plaintiff. The verification of the party will be provided if requested.

Date: _____



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

Service # 1 of 1 Services

Sheriff Docket #

102387

CAPITAL ONE BANK

Case # 07-143-CD

vs.

WILLIAM J. DIXON

TYPE OF SERVICE COMPLAINT

SHERIFF RETURNS

NOW May 05, 2007 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT "NOT FOUND" AS TO WILLIAM J. DIXON, DEFENDANT. MOVED LEFT NO FORWARDING.

SERVED BY: /

Return Costs

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	PATENAUME	10827	10.00
SHERIFF HAWKINS	PATENAUME	10827	18.00

FILED

011:50 AM
MAY 07 2007

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before me This

So Answers,

____ Day of _____ 2007

Chester A. Hawkins
by Marilyn Harr
Chester A. Hawkins
Sheriff

GREGG L. MORRIS, ESQ.
PATENAUDA & 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

CAPITAL ONE BANK,)
Plaintiff,) NO. 07-143-CD
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Filed on behalf of:
CAPITAL ONE 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

I hereby certify this to be a true
and attested copy of the original
statement filed in this case.

JAN 29 2007

Attest.

William L. Morris
Prothonotary/
Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
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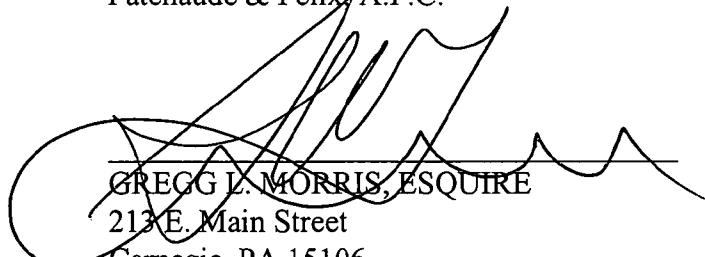
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Respectfully Submitted:

Patenaude & Felix, A.P.C.



Handwritten signature of Gregg L. Morris, Esquire, in black ink, appearing to read "GREGG L. MORRIS, ESQUIRE".

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

762,4279 24

STATE OF GEORGIA

COUNTY OF GWINNETT

Personally appeared before me HENDERSON W MCKENZIE II, who being duly sworn, made oath that he/she is an authorized agent of CAPITAL ONE BANK, and that he/she is authorized to make this affidavit, and to the best of his/her knowledge and belief, DIXON, WILLIAM J is/are justly indebted to CAPITAL ONE BANK in the sum of \$1665.11 Dollars as of 10/07/2006 with 25.90% interest from said date, and reasonable attorney fees, and that the annexed account which is made part hereof is a true and correct statement of said indebtedness. To the best of my knowledge, none of the above named defendant(s) is/are active duty in the military service of the United States or any of its allies as defined in the Soldiers and Sailor's Relief Act of 1940 with amendments.

Given under my hand this 8th day of November, 2006.



Affiant

Maisha Davis

Taken, subscribed and sworn to before me, _____
Notary Public in and for the City/County and State aforesaid, in my City/County
aforesaid this 8th day of November, 2006.

MAISHA DAVIS
HENRY COUNTY, GEORGIA
MY COMMISSION EXPIRES
OCTOBER 24TH, 2010



Notary Public

My commission expires on _____

A144
PATENAUME & FELIX, A.P.C
4862362384128875

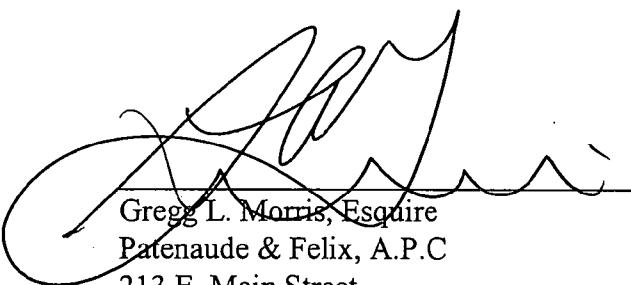
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Date: _____



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

FILED No cc.

12:37pm

APR 29 2010

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

CAPITAL ONE BANK

Plaintiff

) NO. 2007-143-CD

v.

WILLIAM J DIXON

Defendant(s)

**PRAECIPE TO
DISCONTINUE WITHOUT
PREJUDICE**

Filed on behalf of:
CAPITAL ONE BANK

Counsel of Record for This Party:

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

Patenaude & Felix, A.P.C.
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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

CAPITAL ONE BANK

Plaintiff

NO. 2007-143-CD

V.

WILLIAM J DIXON

Defendant(s)

PRAEICE TO DISCONTINUE WITHOUT PREJUDICE

TO: Prothonotary

Please discontinue the matter captioned above without prejudice upon payment of costs
only. Thank you.

Respectfully submitted:
Patenaude & Felix, A.P.C.

Gregg L. Morris, Esquire
213 E. Main Street
Carnegie, PA 15106
(412) 429-7675

Date: April 27, 2010

Sworn to and subscribed before me this
27 day of April, 2010.

Notary Public

