

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

HSBC BANK NEVADA, N.A

Plaintiff

vs.

BOBBI S COONS

Defendant

No: 2007-242-CD

COMPLAINT IN CIVIL ACTION

FILED ON BEHALF OF
Plaintiff

COUNSEL OF RECORD OF
THIS PARTY:

James C. Warmbrodt, 42524
WELTMAN, WEINBERG & REIS CO., L.P.A.
436 Seventh Avenue, Suite 2718
Pittsburgh, PA 15219
(412) 434-7955
FAX: 412-338-7130
05524655 C N Pit BNT

FILED \$85.00
4/12/2006
FEB 15 2007
William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

HSBC BANK NEVADA, N.A

Plaintiff

vs.

Civil Action No

BOBBI S COONS

Defendant

COMPLAINT AND 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 an 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 OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

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.

COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
230 EAST MARKET ST., SUITE 228
CLEARFIELD, PA 16830
(814) 765-2641, ext 1300-1301

COMPLAINT

1. Plaintiff, HSBC BANK NEVADA, N.A is a corporation with offices at 1111 TOWN CENTER DR. LAS VEGAS , NV 89193 .

2. Defendant is adult individual(s) residing at the address listed below:

BOBBI S COONS
321 PARK AVE
CURWENSVILLE, PA 16833

3. Defendant applied for and received a credit card bearing the account number 5466410303031857 .

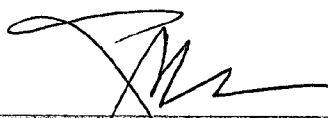
4. Defendant made use of said credit card and has a current balance due of \$9592.24 , as of December 27, 2006 .

5. Defendant is in default by failing to make monthly payments when due. As such, the entire balance is immediately due and payable to Plaintiff.

6. Plaintiff is entitled to the addition of interest at the rate of 19.740% per annum on the unpaid balance from December 27, 2006 . A copy of Plaintiff's STATEMENT is attached hereto, marked as Exhibit "1" and made a part hereof.

7. Although repeatedly requested to do so by Plaintiff, Defendant has willfully failed and/or refused to pay the balance due to Plaintiff.

Wherefore, the Plaintiff prays for judgment in its favor and against Defendant , BOBBI S COONS , INDIVIDUALLY , in the amount of \$9592.24 with continuing interest thereon at the rate of 19.740% per annum from December 27, 2006 plus costs.



James C. Warmbrodt, 42524
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436 Seventh Avenue, Suite 2718
Pittsburgh, PA 15219
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05524655 C N Pit BNT

This law firm is a debt collector attempting to collect this debt for our client and any information obtained will be used for that purpose.

Quick-Look Account Summary

Customer Center	Payment Address:	Statement Date	10/03/06	Account	5466 4103 0303 1857
1-800-947-1000	Cardmember Svcs	New Balance	\$9,175.41	Total Credit Limit	\$0
P.O. Box 80082	PO BOX 37281	Payment Due Date	10/28/06	Total Cash Advance Limit	\$0
Salinas, CA	BALTIMORE	Minimum Payment*	\$283.00	Available Credit	\$0
93912-0082	MD	Overlimit Amount	\$9,175.41	Available Cash Advance	\$0
	21297-3281			# Days This Billing Cycle	27
		Current Payment	\$9,175.41	Page	1 of 1
		Past Due Amount	\$1,765.00		

*See reverse side for an explanation of these amounts.

Account Activity

Previous Balance	- Payments and Other Credits	+ Purchases, Fees and Other Debits	+ Finance Charges	= New Balance
\$9,175.41	\$0.00	\$0.00	\$0.00	\$9,175.41

Finance Charge Calculation

	Average Daily Balance	Daily Periodic Rate	Nominal Annual % Rate	Finance Charge	Cash Advance/ Transaction Fees	Annual Percentage Rate
Purchases	\$0.00	0.0540%	19.74%	\$0.00	\$0.00	0.000%
Cash Advances	\$0.00	0.0000%	23.65%	\$0.00	\$0.00	0.000%

Earnings Summary

Prev Earnings	\$0.00	New Earnings Total	\$0.00
Earnings Rcvd	\$0.00	Anniversary Date	8/06/02
Addtl Earnings	\$0.00	Anniv Y-T-D Earnings	\$0.00
Earnings Adjmnt	\$0.00	Lifetime Earnings Rdem	\$0.00
Current Period	\$0.00	ngs	

Remember, every time you make a purchase with your GM Card, you'll earn 5% in GM Card Earnings. You can save hundreds, even thousands on the purchase or lease of your new GM car or truck (excluding Saturn, Saab and HUMMER H1). Choose from over 50 brands.

When you're ready to redeem your GM Card Earnings to buy or lease an eligible new GM car or truck, call us at 1-800-947-1000.

EXHIBIT

100750 Z 03
STMTGX J
(Please detach and return bottom portion with payment and retain top portion for your records. Do not staple or clip your check to the form below.)

Account Information

Account Number	Payment Due Date	New Balance	Current Payment Due
5466 4103 0303 1857	10/28/06	\$9,175.41	\$9,175.41

Make Check Payable to:

GM CARDMEMBER SERVICES
-Please write your account number on your check; do not send cash
-Do not fold, staple or clip
-Please send your payment 7 days prior to the due date to ensure timely delivery
-Submit one check or money order per payment coupon
See reverse for more information

GM CARDMEMBER SERVICES
PO BOX 37281
BALTIMORE MD 21297-3281

BOBBI S COONS
321 PARK AVE
CURWENSVILLE PA 16833-1535
0917541 0917541 5466410303031857 1

VERIFICATION

The undersigned does hereby verify subject to the penalties of 18 PA. C.S. 4904 relating to unsworn falsifications to authorities, that he/she is Alex Mendez
(NAME)

Manager of HSBC Bank Nevada, plaintiff herein, that
(TITLE) (COMPANY)

he/she is duly authorized to make this verification, and that the facts set forth in the foregoing Complaint are true and correct to the best of his/her knowledge, information and belief.

[Signature]
(SIGNATURE)

WWR#

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102457
NO: 07-242-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: HSBC BANK NEVADA, N.A.
vs.
DEFENDANT: BOBBI S. COONS

SHERIFF RETURN

NOW, February 20, 2007 AT 9:34 AM SERVED THE WITHIN COMPLAINT ON BOBBI S. COONS DEFENDANT AT 321 PARK AVE., CURWENSVILLE, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO DEBRA SHOPE, SISTER A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DAVIS / MORGILLO

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	WELTMAN	2671010	10.00
SHERIFF HAWKINS	WELTMAN	2671010	23.82

FILED
09:40 am
MAY 11 2007

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

_____ Day of _____ 2007

So Answers,


Chester A. Hawkins
Sheriff

FILED

MAY 11 2007

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

HSBC BANK NEVADA, N.A

Plaintiff

vs.

BOBBI S COONS

Defendant

No. 2007-242-CD

**PRAECIPE TO SETTLE, DISCONTINUE
& END WITHOUT PREJUDICE**

FILED ON BEHALF OF
Plaintiff

COUNSEL OF RECORD OF
THIS PARTY:

James C. Warmbrodt, Esquire
Pa. I.D. No. 42524
Weltman, Weinberg & Reis, Co. LLC
2718 Koppers Building
436 7th Avenue
Pittsburgh, PA 15219

FILED 1cc @ 1 Cert.
MT 11:03 AM of Disc. to
NOV 19 2007 *Atty*
William A. Shaw
Prothonotary/Clerk of Courts

WWR 05524655

IN THE COURT OF COMMON PLEAS CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

HSBC BANK NEVADA, N.A

Plaintiff

vs.

Civil Action No. 2007-242-CD

BOBBIE S COONS

Defendant

PRAECIPE TO SETTLE DISCONTINUE AND END WITHOUT PREJUDICE

TO THE PROTHONOTARY OF COUNTY:

Please kindly Settle Discontinue and End without prejudice the above captioned matter upon the records of the Court and mark the cost paid.

WELTMAN, WEINBERG & REIS CO., L.P.A.

By: 

James C. Warbrodt, Esquire

Pa. I.D. No. 42524

Weltman, Weinberg & Reis, Co. LLC

2718 Koppers Building

436 7th Avenue

Pittsburgh, PA 15219

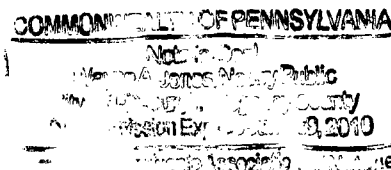
Sworn to and subscribed

Before me the 12th

Day of November, 2007



NOTARY PUBLIC



WWR 05524655

FILED

NOV 19 2007

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

COPY

HSBC Bank Nevada, N.A.

Vs.
Bobbi S. Coons

No. 2007-00242-CD

CERTIFICATE OF DISCONTINUATION

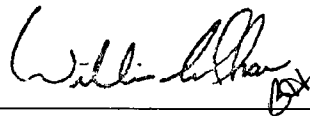
Commonwealth of PA
County of Clearfield

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 November 19, 2007, marked:

Settled, Discontinued, and Ended without Prejudice

Record costs in the sum of \$85.00 have been paid in full by James C. Warmbrodt, Esq.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 19th day of November A.D. 2007.



William A. Shaw, Prothonotary