

07-242-CD  
**HSBC Bank of NV vs Bobbi Coons**

HSBC Bank of NV vs Bobbi Coons  
2007-242-CD

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

HSBC BANK NEVADA, N.A

Plaintiff

No: 2007-242-CD

vs.

COMPLAINT IN CIVIL ACTION

BOBBI S COONS

Defendant

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  
1/12/2007 Atty  
FEB 15 2007 1cc Atty  
JN

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

Civil Action No

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  
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

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

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

Account Activity

Previous - Payments and + Purchases, Cash Advances, + Finance = New Balance  
 Balance Other Credits Fees and Other Debits Charges

\$9,175.41	\$0.00	\$0.00	\$0.00	\$9,175.41
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Finance Charge Calculation

Average Daily Balance	Nominal Daily Periodic 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  
 Addtnl Earnings \$0.00 Anniv Y-T-D Earnings \$0.00  
 Earnings Adjmnt \$0.00 Lifetime Earnings \$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**

11/11

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	Amount Enclosed
-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 Ariel Mavloza  
(NAME)

Manager of HSBC Bank Nevada Inc., 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.

Ernesto  
(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

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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  
(S)

William A. Shaw  
Prothonotary/Clerk of Courts

Sworn to Before Me This

\_\_\_\_ Day of \_\_\_\_\_ 2007

So Answers,

*Chester A. Hawkins  
by Marilyn Hupp*  
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 No. 2007-242-CD

vs.

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

BOBBI S COONS

Defendant

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 7<sup>th</sup> Avenue  
Pittsburgh, PA 15219

**FILED** ICC OI Cest.  
M 11:03 AM of Disc. to  
NOV 19 2007 Atty  
W.A. Shaw  
Prothonotary/Clerk of Courts

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

HSBC BANK NEVADA, N.A.

Plaintiff

vs.

Civil Action No. 2007-242-CD

BOBBI S COONS

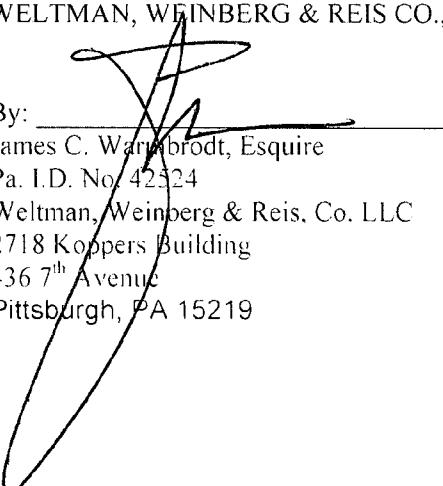
Defendant

**PRAECIPE TO SETTLE DISCONTINUE AND END WITHOUT PREJUDICE**

TO THE PROTHONOTARY OF COUNTY:

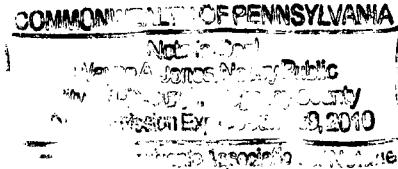
Please kindly Settle Discontinue and End without prejudice the above captioned matter upon the records of the Court and mark the cost paid.

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 7<sup>th</sup> Avenue  
Pittsburgh, PA 15219

Sworn to and subscribed  
Before me the 12th  
Day of November, 2007

  
NOTARY PUBLIC



**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**

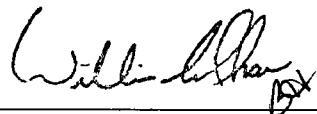
Commonwealth of PA  
County of Clearfield

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