

07-249-CD
HSBC Nevada vs Pauline McBride

HSBC Nevada vs Pauline McBride
2007-249-CD

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

HSBC NEVADA BANK, N.A.

Plaintiff

No. 07-249-CD

vs.

COMPLAINT IN CIVIL ACTION

PAULINE MCBRIDE

Defendant

FILED ON BEHALF OF
Plaintiff

COUNSEL OF RECORD OF
THIS PARTY:

James C. Warmbrodt, Esquire
PA I.D. #42524
WELTMAN, WEINBERG & REIS CO., L.P.A.
2718 Koppers Building
436 Seventh Avenue
Pittsburgh, PA 15219
(412) 434-7955

WWR#05491241

FILED *Atty pd \$5.00*
M 11:28 AM
FEB 16 2007 1CC Sheriff
S
William A. Shaw
Prothonotary/Clerk of Courts

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

HSBC NEVADA BANK, N.A.

Plaintiff

vs.

Civil Action No.

PAULINE MCBRIDE

Defendant

COMPLAINT IN CIVIL ACTION 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 ON 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 is a corporation with offices at 1111 Towne Center Drive, Las Vegas, NV 89193-8724.
2. Defendant is an adult individual residing at 2420 SALEM RD WEST DECATUR,PA 16878.
3. Defendant applied for and received a credit card issued by Plaintiff bearing the account number 5408010005962564 .
4. Defendant made use of said credit card and has currently a balance due and owing to Plaintiff, as of January 30, 2007, in the amount of \$3342.34. A true and correct copy of Plaintiff's Statement of Account is attached hereto, marked as Exhibit "1" and made a part hereof.
5. Defendant is in default of the terms of the cardholder Agreement having not made monthly payments to Plaintiff thereby rendering the entire balance immediately due and payable.
6. Plaintiff avers that the Cardholder Agreement between the parties provides that Plaintiff is entitled to the addition of finance charges at the statutory rate of 6% per annum on the unpaid balance.
7. Although repeatedly requested to do so by Plaintiff, Defendant has willfully failed and/or refused to pay the principal balance, finance charges or any part thereof to Plaintiff.

WHEREFORE, Plaintiff demands Judgment in its favor and against Defendant, PAULINE MCBRIDE individually, in the amount of \$3342.34 with continuing finance charges thereon at the statutory rate of 6% per annum from the date of judgment, plus costs.

THIS IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION OBTAINED SHALL BE USED FOR THAT PURPOSE.

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

James C. Warmbrodt, Esquire
PA I.D. #42524
WELTMAN, WEINBERG & REIS CO., L.P.A.
2718 Koppers Building
436 Seventh Avenue
Pittsburgh, PA 15219
(412) 434-7955

WWR#:05491241

HOUSEHOLD BANK GOLD MASTERCARD STATEMENT

PAULINE MCBRIDE

Page 1 of 2

ACCOUNT SUMMARY		PAYMENT SUMMARY		BALANCE SUMMARY	
ACCOUNT NUMBER	5408-0100-0596-2564	OVERLIMIT AMOUNT	\$914.74	PREVIOUS BALANCE	\$3,054.37
TOTAL CREDIT LIMIT	\$2,305	MINIMUM PAYMENT*	\$80.00	PAYMENTS/CREDITS	- \$0.00
TOTAL CREDIT LIMIT AVAILABLE	\$0	CURRENT PAYMENT DUE*	\$994.74	PURCHASES/DEBITS	+ \$92.10
		PAYMENT DUE DATE	03/02/05		
		PAST DUE AMOUNT	\$216.00		
STATEMENT DATE	02/06/05	*See reverse side for an explanation of these amounts.		FINANCE CHARGE	+ \$73.27
				NEW BALANCE	= \$3,219.74

TRANSACTION SUMMARY

TRAN DATE	POST DATE	TRANSACTION DESCRIPTION	REFERENCE NUMBER	AMOUNT CHARGES	AMOUNT CREDITS
01/28/01/28		LATE CHARGE ASSESSMENT	10000001030000999880950	\$35.00	
01/15/01/16		OVERLIMIT CHARGE ASSESSMENT	10000001030000999650410	\$35.00	
02/05/02/06		HIS PAYMENT PROTECTION PLAN 800-627-7282		\$22.10	

IF YOU ARE UNABLE TO SEND YOUR PAYMENT TODAY, PLEASE CALL 800-395-0500 TO DISCUSS A REPAYMENT ARRANGEMENT.

MAIL PAYMENTS TO:
 HOUSEHOLD CREDIT SERVICES
 PO BOX 17051
 BALTIMORE MD 21297-1051

QUESTIONS?
 24-HOUR CUSTOMER SERVICE
 1-800-477-6000
 OUTSIDE USA, COLLECT: 1-757-523-3880
 TDD HEARING IMPAIRED: 1-800-395-9020
 Manage your account online at:
 www.householdbank.com

090550 E 05 0000000103 G STM37 D C
 PLEASE DETACH AND RETURN BOTTOM PORTION WITH YOUR PAYMENT:
 To Assure Proper Credit Please Write Your Account Number On Your Check

MAIL INQUIRIES TO:
 HOUSEHOLD CREDIT SERVICES
 PO BOX 81622
 SALINAS CA 93912-1622

Account Number 5408-0100-0596-2564
 New Balance \$3,219.74
 Payment Due Date 03/02/05 Current Payment Due \$994.74

Make checks payable to HOUSEHOLD CREDIT SERVICES. Please write your account number on your check. Do not fold, staple or clip. Do not send cash. Please send your payment 7 days prior to the payment due date to ensure timely delivery.

Amount
Enclosed

EXHIBIT

PAULINE MCBRIDE
 2420 SALEM RD
 WEST DECATUR GA 30085-9223

HOUSEHOLD CREDIT SERVICES
 PO BOX 17051
 BALTIMORE MD 21297-1051

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 Mendoza

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

A handwritten signature in black ink, appearing to read "Ariel Mendoza". The signature is fluid and cursive, with a long horizontal stroke on the left and a more stylized, looped section on the right.

(Signature)

Wwr#

FILED

FEB 16 2007

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102458
NO: 07-249-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: HSBC NEVADA BANK, N.A.
vs.
DEFENDANT: PAULINE MCBRIDE

SHERIFF RETURN

NOW, March 07, 2007 AT 11:06 AM SERVED THE WITHIN COMPLAINT ON PAULINE MCBRIDE DEFENDANT AT 2420 SALEM RD, WEST DECATUR, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO PAULINE MCBRIDE, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: HUNTER / DEHAVEN

FILED
07/18/2007
MAY 21 2007
JW

William A. Shaw
Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	WELTMAN	8407490	10.00
SHERIFF HAWKINS	WELTMAN	8407490	28.67

Sworn to Before Me This

____ Day of _____ 2007

So Answers,

Chester A. Hawkins
by Marlyz Hays
Chester A. Hawkins
Sheriff

FILED

MAY 21 2007

William A. Shaw
Prothonotary/Clerk of Courts

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

HSBC NEVADA BANK, N.A

Plaintiff

vs.

Civil Action No. : 07-249-CD

PAULINE MCBRIDE

Defendant

NOTICE OF JUDGMENT OR ORDER

TO: Plaintiff
 Defendant
 Garnishee

You are hereby notified that the following
Order or Judgment was entered against you
on July 2, 2007

Assumpsit Judgment in the amount
of \$3,342.34 plus costs.

Trespass Judgment in the amount
of \$_____ plus costs.

If not satisfied within sixty (60)
days, your motor vehicle operator's license and/or registration
will be suspended by the Department of Transportation, Bureau
of Traffic Safety, Harrisburg, PA.

Entry of Judgment of
 Court Order
 Non-Pros
 Confession
 Default
 Verdict
 Arbitration
Award

Prothonotary

By: 
PROTHONOTARY (OR DEPUTY)

PAULINE MCBRIDE
2420 SALEM RD
WEST DECATUR, PA 16878

Plaintiff's address is:

c/o Weltman, Weinberg & Reis Co., L.P.A., 2718 Koppers Building, 436 7th Avenue, Pittsburgh, PA 15219
1-888-434-0085

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

HSBC NEVADA BANK, N.A

Plaintiff No. : 07-249-CD

vs. PRAECIPE FOR DEFAULT JUDGMENT

PAULINE MCBRIDE

Defendant

FILED ON BEHALF OF
Plaintiff

COUNSEL OF RECORD OF
THIS PARTY:

WILLIAM T. MOLCZAN, ESQUIRE
PA I.D.#47437
Weltman, Weinberg & Reis Co., L.P.A.
2718 Koppers Bldg.
436 Seventh Avenue
Pittsburgh, PA 15219
(412) 434-7955

WWR#05491241
Judgment Amount \$ 3,342.34

**THIS LAW FIRM IS ATTEMPTING TO COLLECT THIS DEBT FOR ITS CLIENT AND ANY
INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.**

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

HSBC NEVADA BANK, N.A

Plaintiff

vs.

Civil Action No. : 07-249-CD

PAULINE MCBRIDE

Defendant

FILED

JUL 02 2007

6/12/2007
William A. Shaw
Prothonotary/Clerk of Courts
Clerk to Atty &
PLFF w/notice

PRAECIPE FOR DEFAULT JUDGMENT

TO THE PROTHONOTARY:

Kindly enter Judgment against the Defendant, PAULINE MCBRIDE above named, in the default of an Answer, in the amount of \$3,342.34 computed as follows:

Amount claimed in Complaint	\$3,342.34
Interest from date of judgment at the legal interest rate of 6% per annum	
 TOTAL	\$3,342.34

I hereby certify that appropriate Notices of Default, as attached have been mailed in accordance with PA R.C.P. 237.1 on the dates indicated on the Notices.

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

By: 
WILLIAM T. MOJczan, ESQUIRE
PA I.D.#47437
Weltman, Weinberg & Reis Co., L.P.A.
2718 Koppers Bldg.
436 Seventh Avenue
Pittsburgh, PA 15219
(412) 434-7955

WWR#05491241

Plaintiff's address is:

c/o Weltman, Weinberg & Reis Co., L.P.A., 2718 Koppers Building, 436 7th Avenue, Pittsburgh, PA 15219
And that the last known address of the Defendant is: 2420 SALEM RD, WEST DECATUR, PA 16878

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

HSBC BANK NEVADA, N.A.

Plaintiff

Case # 07-249-CD

PAULINE MCBRIDE

Defendant(s)

IMPORTANT NOTICE

TO: PAULINE MCBRIDE
2420 SALEM RD
WEST DECATUR, PA 16878

Date of Notice: 4-27-07
WWR#: 05491241

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 PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE FOLLOWING 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.

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

BY: Patrick Thomas Woodman
PATRICK THOMAS WOODMAN
PA I.D. #34507
WELTMAN, WEINBERG & REIS CO., L.P.A.
2718 KOPPERES BLDG, 436 7TH AVE.
PITTSBURGH, PA 15219

Department of Defense Manpower Data Center

JUN-27-2007 05:04:57



Military Status Report
Pursuant to the Servicemembers Civil Relief Act

Last Name	First/Middle	Begin Date	Active Duty Status	Service/Agency
MCBRIDE	PAULINE		Based on the information you have furnished, the DMDC does not possess any information indicating that the individual is currently on active duty.	

Upon searching the information data banks of the Department of Defense Manpower Data Center, based on the information that you provided, the above is the current status of the individual as to all branches of the Military.

Mary M. Snavely-Dixon

Mary M. Snavely-Dixon, Director
Department of Defense - Manpower Data Center
1600 Wilson Blvd., Suite 400
Arlington, VA 22209-2593

The Defense Manpower Data Center (DMDC) is an organization of the Department of Defense that maintains the Defense Enrollment and Eligibility Reporting System (DEERS) database which is the official source of data on eligibility for military medical care and other eligibility systems.

The Department of Defense strongly supports the enforcement of the Servicemembers Civil Relief Act [50 USCS Appx. #167;#167; 501 et seq] (SCRA) (formerly the Soldiers' and Sailors' Civil Relief Act of 1940). DMDC has issued hundreds of thousands of "does not possess any information indicating that the individual is currently on active duty" responses, and has experienced a small error rate. In the event the individual referenced above, or any family member, friend, or representative asserts in any manner that the individual is on active duty, or is otherwise entitled to the protections of the SCRA, you are strongly encouraged to obtain further verification of the person's active duty status by contacting that person's Military Service via the "defenselink.mil" URL provided below. If you have evidence the person is on active-duty and you fail to obtain this additional Military Service verification, provisions of the SCRA may be invoked against you.

If you obtain further information about the person (e.g., an SSN, improved accuracy of DOB, a middle name), you can submit your request again at this Web site and we will provide a new certificate for that query.

This response reflects current active duty status only. For historical information, please contact the Military Service SCRA points-of-contact.

See: <http://www.defenselink.mil/faq/pis/PC09SLDR.html>

WARNING: This certificate was provided based on a name and Social Security number (SSN) provided

by the requester. Providing an erroneous name or SSN will cause an erroneous certificate to be provided.

Report ID: BBWRISAXDEO

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

HSBC NEVADA BANK, N.A

Case no: : 07-249-CD

Plaintiff
vs.
NON-MILITARY AFFIDAVIT

PAULINE MCBRIDE

Defendant

The undersigned, who first being duly sworn, according to law, deposes and states as follows:

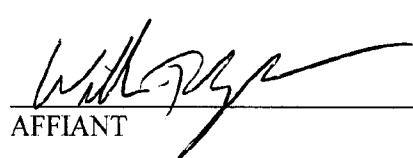
That he/she is the duly authorized agent of the Plaintiff in the within matter.

Affiant further states that the within Affidavit is made pursuant to and in accordance with the Servicemembers' Civil Relief Act (SCRA), 50 U.S.C. App. § 521.

Affiant further states that based upon investigation it is the affiant's belief that the Defendant, PAULINE MCBRIDE is not in the military service.

Affiant further states that this belief is supported by the attached certificate from the Defense Manpower Data Center (DMDC), which states that the Defendant, PAULINE MCBRIDE is not in the military service.

Further Affiant sayeth naught.


AFFIANT

SWORN TO AND SUBSCRIBED in my presence this 19th day
of June 2007


NOTARY PUBLIC

COMMONWEALTH OF PENNSYLVANIA	
Notarial Seal	
Wayne A. Jones, Notary Public	
City Of Pittsburgh, Allegheny County	
My Commission Expires June 29, 2010	
Member, Pennsylvania Association of Notaries	

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.

William A Shaw
Prothonotary/Clerk of Courts

July 12 2001

FILED

25

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

HSBC BANK NEVADA, N.A.

Plaintiff No. : 07-249-CD

vs. PRAECIPE FOR SATISFACTION OF
JUDGMENT

PAULINE MCBRIDE

Defendant FILED ON BEHALF OF
Plaintiff

COUNSEL OF RECORD OF
THIS PARTY:

William T. Molczan, Esquire
PA. I.D.#47437
WELTMAN, WEINBERG & REIS CO., L.P.A.
2718 Koppers Building
436 Seventh Avenue
Pittsburgh, PA 15219
(412) 434-7955

WWR#05491241

pd \$7.00 Atty.
FILED no CC
m/2:10pm 1 cert &
NOV 26 2007 Sat issued
William 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. : 07-249-CD

PAULINE MCBRIDE

Defendant

PRAECIPE FOR SATISFACTION OF JUDGMENT

At the request of the undersigned attorneys for the Plaintiff, you are directed to satisfy the above-captioned Judgment.

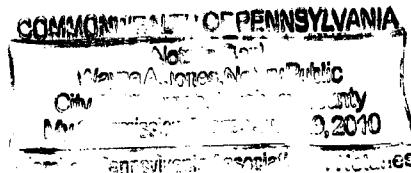
WELTMAN, WEINBERG & REIS CO., L.P.A.

By: William T. Molczan
William T. Molczan, Esquire
PA. I.D.#47437
WELTMAN, WEINBERG & REIS CO., L.P.A.
2718 Koppers Building
436 Seventh Avenue
Pittsburgh, PA 15219
(412) 434-7955

WWR #05491241

Sworn to and subscribed
before me this 16
day of November, 07


NOTARY PUBLIC



FILED

NOV 26 2007

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

COPY

CERTIFICATE OF SATISFACTION OF JUDGMENT

No.: 2007-00249-CD

HSBC Nevada Bank, N.A.

Debt: \$3342.34

Vs.

Atty's Comm.:

Pauline McBride

Interest From:

Cost: \$7.00

NOW, Monday, November 26, 2007, directions for satisfaction having been received, and all costs having been paid, SATISFACTION was entered of record.

Certified from the record this 26th day of November, A.D. 2007.



William L. Shan

Prothonotary