

07-330-CD  
Discover Bank vs Richard L. Sanker

Discover Bank et al vs Richard Sanker  
2007-330-CD

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY  
PENNSYLVANIA

DISCOVER BANK ISSUER OF THE  
DISCOVER CARD

No. 2007-330-CD

C/O WOLPOFF & ABRAMSON, L.L.P.  
4660 TRINDLE ROAD, 3<sup>rd</sup> FLOOR  
CAMP HILL, PA 17011

Plaintiff

Type of Case: Contract

VS.

RICHARD L SANKER  
605 OLDRUTE  
#322  
PHILIPSBURG PA 16866

Type of Pleading:

Filed on Behalf of: Plaintiff

Defendant(s)

Date: 2/26/07

*Amy E. Doyle*  
Amy E. Doyle #87062 / Daniel F. Wolfson #20617  
Philip C. Warholic #86341 / David R. Galloway #87326  
Tonilyn M. Chippie #87852 / Sarah E. Ehasz #86469  
Robert N. Polas, Jr. #201259 / Bruce H. Cherkis #18837  
Ronald S. Canter #94000 / Ronald M. Abramson #94266  
Wolpoff & Abramson, L.L.P.  
Attorneys in the Practice of Debt Collection  
4660 Trindle Road, Suite 300  
Camp Hill, PA 17011  
Telephone: (717) 303-6700  
Counsel for Plaintiff

FILED *pd \$85.00 Atty*  
*1cc Shff*  
*m/3:20 cm*  
*1cc Atty*  
*MAR 05 2007*

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DISCOVER BANK  
ISSUER OF THE DISCOVER CARD  
Plaintiff

vs

RICHARD L SANKER  
Defendant(s)

: No.

: CIVIL ACTION - LAW

**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 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 or any other claim or relief requested by the Plaintiff. You may lose money or property 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 HELP. 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.

Centre County Courthouse  
Court Administrator Allegheny Street  
Bellefonte, PA 16823  
814-355-6727

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DISCOVER BANK  
ISSUER OF THE DISCOVER CARD  
Plaintiff

: No.

vs

: CIVIL ACTION - LAW

RICHARD L SANKER  
Defendant(s)

NOTICIA

USTED HA SIDO DEMANDADO/A EN LA CORTE. Si usted desea defender conta la demanda puestas en las siguientes paginas, usted tienen que tomar acción dentro veinte (20) dias después que esta Demanda y Aviso es servido, con entrando por escrito una apariencia personalmente o por un abogado y archivando por escrito con la Corte sus defensas o objeciones a las demandas puestas en esta contra usted. Usted es advertido que si falla de hacerlo el caso puede proceder sin usted y un juzgamiento puede ser entrado conta usted por la Corte sin mas aviso por cualquier dinero reclamado en la Demanda o por cualquier otro reclamo o alivio solicitado por Demandante. Usted puede perder dinero o propiedad o otros derechos importante para usted.

USTED DEBE LLEVAR ESTE PAPEL A SU ABOGADO ENSEGUIDA. SI USTED NO TIENE UN ABOGADO, VAYA O LLAME POR TELEFONO LA OFICINA FIJADA AQUI ABAJO. ESTA OFICINA PUEDE PROVEERE CON INFORMACION DE COMO CONSEGUIR UN ABOGADO.

SI USTED NO PUEDE PAGARLE A UN ABOGADO, ESTA OFICINA PUEDE PROVEERE INFORMACION ACERCA AGENCIAS. QUE PUEDAN OFRECER SERVICIOS LEGAL A PERSONAS ELIGIBLE AQ UN HONORARIO REDUCIDO O GRATIS.

Centre County Courthouse  
Court Administrator Allegheny Street  
Bellefonte, PA 16823  
814-355-6727

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DISCOVER BANK : No.  
ISSUER OF THE DISCOVER CARD  
Plaintiff  
vs  
CIVIL ACTION - LAW  
RICHARD L SANKER  
Defendant(s)

COMPLAINT

AND NOW, comes the Plaintiff, by and through its attorneys and the law firm of Wolpoff & Abramson, LLP, and files this Complaint and in support avers as follows:

1. Plaintiff is DISCOVER BANK ISSUER OF THE DISCOVER CARD , located at 6500 New Albany Road New Albany, OH 43054.
2. Defendant, RICHARD L SANKER, is an adult individual with a last known address of 605 Oldroute #322 Philipsburg, Clearfield County, PA 16866.
3. It is averred that Defendant was issued an open end credit card account.
4. At all relevant times material hereto, Defendant has used said charge card for the purchase of products, goods and/or for obtaining services.
5. Defendant was provided with copies of the Statement of Accounts showing all debits and credits for transactions on the aforementioned credit card account to which there was no bona fide objection by Defendant. A true and correct copy of the Statement of Account is attached hereto, incorporated herein and marked as Exhibit "A".

6. As of the date of this Complaint, the remaining balance due, owing and unpaid on Defendant's credit card account as a result of the charges made by said Defendant and/or any authorized users is the sum of \$9,997.60.

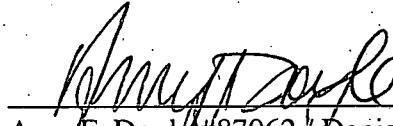
7. Despite reasonable and repeated demands for payment, Defendant has refused and continues to refuse to pay all sums due and owing on the aforementioned account balance, all to the damage and detriment of the Plaintiff.

8. The amount in controversy is within the jurisdictional amount requiring compulsory arbitration.

WHEREFORE, Plaintiff respectfully requests this Honorable Court enter Judgment in favor of the Plaintiff and against Defendant(s) in the amount of \$9,997.60, plus costs of this action and any other relief as this Court deems just and reasonable.

Respectfully Submitted,

Date: 2/16/07

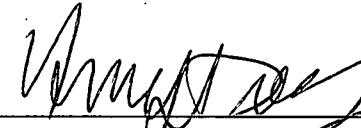
  
\_\_\_\_\_  
Amy F. Doyle #87062 / Daniel F. Wolfson #20617  
Philip C. Warholic #86341 / David R. Galloway #87326  
Tonilyn M. Chippie #87852 / Sarah E. Ehasz #86469  
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Wolpoff & Abramson, L.L.P.  
Attorneys in the Practice of Debt Collection  
4660 Trindle Road, Suite 300  
Camp Hill, PA 17011  
Telephone: (717) 303-6700  
Counsel for Plaintiff

VERIFICATION

The undersigned hereby states that they are the attorney for the Plaintiff who is located outside of this jurisdiction and in order to file the within document in an expedient and timely manner, they are authorized to take this verification on behalf of said Plaintiff in the within action and verifies that the statements made in the foregoing Pleading are true and correct to the best of their knowledge, information, and belief, based upon information provided by the Plaintiff.

The undersigned understands that false statements herein are made subject to the penalties of 18 Pa.C.S. Section 4904, relating to unsworn falsification to authorities.

Date: 2/26/07

  
\_\_\_\_\_  
Amy F. Doyle #87062 / Daniel F. Wolfson #20617  
Philip C. Warholic #86341 / David R. Galloway #87326  
Tonilyn M. Chippie #87852 / Sarah E. Ehasz #86469  
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4660 Trindle Road, Suite 300  
Camp Hill, PA 17011  
Telephone: (717) 303-6700  
Counsel for Plaintiff

# **Exhibit "A"**

CLIENT NO 001837 Discover Financial Services ACCT#6011002220716997  
ACCOUNT#----60CHG OFF AMT-10,216.60 CHG OFF DATE-08/31/04  
INT RATE---0000 LAST INT DATE-  
CHG OFF RSN--0000 ACCT STATUS--416

\*

\*\*\*\*\* PRIMARY DEBTOR \*\*\*\*\*

LAST NAME---SANKER

DOB-----

== == HOME INFORMATION == == ==

HOME PHONE#--(124)200-0000 HM PH FLG-R  
HOME ADDR1--605 OLD ROUTE 322

ADDR2

CITY/STPHILIPSBURG PA 68668-0010

RECORD-TYPE-A

LOAN-TYPE PLAT

ATTRNY CD --

DEALER CODE--

FIRST NAME--RICHARD L

TITLE--

== == WORK INFORMATION == == ==

WORK PHONE#-000-0000 WK PH FLG-R  
EMPLOYER---

COUNTY-----

SEQ NO-----00

LENDING OFC--000001

CHG OFF RSN--0000

RECEIPT DATE-08/31/04

CUST TYPE---I

USER FIELD --

AGENCY CODE--2C35

ACCT STATUS--416

CONTRACTDATE-

11/08/99

ASSOC COST---.00

CUR BAL-----9,997.60

ACC INTREST--.00

COMMENT DATE-

LST COMMENT--

NET PRIN---00099976{  
SECOND NAME--  
MTHLY PYMT---.00  
RCVRY SCORE--0135  
LSTCONT DATE-  
CUST ID-SSN--XXX-XX-4487  
PARNT ORG CD-MR01  
U20 CRD LIMIT--000880000  
U25 CB RPT IND--1

NET ASSC COST-00000000{  
MTHLY INCOME-.00  
OTHER OBLIG--.00  
COMM RATE----3000  
AGENCY CODE--2C35  
U18-CAS-ADV OUT--000250450

NET INTER--00000000{  
OTHER INCOME-.00  
RENT CODE----  
LSTPYMT DATE-10/04/04  
ADDR FLAG----Y  
FORMAT CODEA-B  
U01 EXT STAT CD--Z

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102524  
NO. 07-330-CD  
SERVICE # 1 OF 1  
COMPLAINT

PLAINTIFF: DISCOVER BANK ISSUER OF THE DISCOVER CARD  
vs.  
DEFENDANT: RICHARD L. SANKER

SHERIFF RETURN

---

NOW, March 08, 2007 AT 2:53 PM SERVED THE WITHIN COMPLAINT ON RICHARD L. SANKER DEFENDANT AT 605 OLD ROUTE #322, PHILIPSBURG, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO RICHARD L. SANKER, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

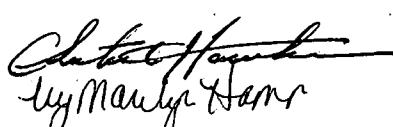
SERVED BY: HAWKINS /

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	WOLPOFF	162015	10.00
SHERIFF HAWKINS	WOLPOFF	162015	33.91

FILED No CC.  
03:00 AM  
JUN 28 2007

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

Sworn to Before Me This  
\_\_\_\_ Day of \_\_\_\_\_ 2007

  
Chester A. Hawkins  
Sheriff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DISCOVER BANK  
ISSUER OF THE DISCOVER CARD  
Plaintiff

No. 2007-330-CD  
CIVIL ACTION - LAW

VS

RICHARD L SANKER  
Defendant(s)

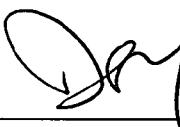
**PRAECIPE TO DISCONTINUE**

To the Prothonotary:

Please mark the above-entitled case as discontinued without prejudice.

Respectfully Submitted,

Date: 7/6/07

  
Amy F. Doyle #87062 / Daniel E. Wolfson #20617  
Philip C. Warholic #86341 / David R. Galloway #87326  
Tonilyn M. Chippie #87852 / Sarah E. Ehasz #86469  
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Attorneys in the Practice of Debt Collection  
4660 Trindle Road, Suite 300  
Camp Hill, PA 17011  
Telephone: (717) 303-6700  
Counsel for Plaintiff

FILED cc & 1 cert  
M 11:32 am of disc issued  
JUL 11 2007 to Atty Galloway  
*LS*

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

COPY

CIVIL DIVISION

**Discover Bank**  
**Discover Card**

Vs. No. 2007-00330-CD  
**Richard L. Sanker**

**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 July 11, 2007, marked:

Discontinued without prejudice

Record costs in the sum of \$85.00 have been paid in full by Amy F. Doyle Esq.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 11th day of July A.D. 2007.



\_\_\_\_\_  
William A. Shaw, Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

DISCOVER BANK  
Plaintiff

No. 2007-330-CD

vs.

CIVIL ACTION - LAW

RICHARD L SANKER  
Defendant(s)

**CERTIFICATE OF SERVICE**

The undersigned does hereby certify that a copy of the foregoing praecipe was served this date by Regular Mail, Postage Pre-Paid on this 9 day of

July, 2007.

Richard L Sanker  
605 OLDRROUTE #322  
PHILIPSBURG, PA 16866

Kimberly L Eisenhauer  
Kimberly L Eisenhauer  
WOLPOFF & ABRAMSON, L.L.P.  
4660 Trindle Road, Suite 300  
Camp Hill, PA 17011  
Telephone: (717) 303-6700

FILED 1cc to  
m/11/32 cm Atty  
JUL 11 2007 Eisenhauer  
WAS  
JW

William A. Shaw  
Prothonotary/Clerk of Courts