

07-564-CD  
Discover Bank vs B. Zaferopolos

Discover Card vs Bill Zaferopolos et al  
07-564-CD

FILED (Ew)

MAR 09 2007

M / 11:15 / AM

William A. Shaw  
Prothonotary/Clerk of Courts  
1 CENT TO SHAR

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

DISCOVER BANK

Plaintiff

No: 2007-364-CO

vs.

COMPLAINT IN CIVIL ACTION

BILL R ZAFEROPOLOS  
AKA WILLIAM R ZAFEROPOLOS

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  
05638108 C A Pit WLG

July 30, 2007 Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.

Deputy Prothonotary

February 19, 2008 Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.

Deputy Prothonotary

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

DISCOVER BANK

Plaintiff

vs.

Civil Action No

BILL R ZAFEROPOLOS  
AKA WILLIAM R ZAFEROPOLOS

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, is a corporation with offices at 6500 NEW ALBANY ROAD  
NEW ALBANY , OH 43054 .

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

BILL R ZA FEROPOLOS  
6390 AYLESWORTH  
ALLPORT, PA 16821

3. Defendant applied for and received a credit card issued by  
Plaintiff bearing the account number 6011005300174052 . A copy of  
Plaintiff's Statement of Account s attached hereto, marked as Exhibit  
"A" and made a part hereof.

4. Defendant made use of said credit card and currently has a balance  
due and owing to Plaintiff, as of January 18, 2007 , in the amount of  
\$2208.69 .

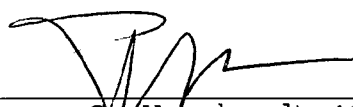
5. Defendant is in default by failing to make payments when due.

6. Plaintiff avers that the Agreement between the parties provides  
that Defendant will pay Plaintiff's attorneys' fees.

7. Plaintiff avers that such attorneys' fees will amount to \$300.00 .

8. 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 , BILL R ZAFEROPoulos ,INDIVIDUALLY , in the amount of \$2208.69 with interest at the legal rate of 6.000% per annum from date of judgment plus attorneys' fees of \$300.00 , and 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  
05638108 C A Pit WLG

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.

**OVER**  
CARD

New Balance  
**\$2,208.69**

Minimum Payment Due  
**\$289.00**

Payment Due Date  
**November 15, 2006**



Account Number **6011 0053 0017 4052**  
Enter Amount Enclosed Below

\$ **5638108**

Please make check payable to Discover Card.  
You are overlimit. Pay the sum of the monthly  
minimum payment plus the overlimit amount of  
\$708.69.

Consolidate bills quickly and securely  
with a Balance Transfer to your Discover  
Card - Call 1-877-353-0989 or visit  
Discovercard.com/balancetransfer TODAY!

16 SDSN6A01 0004627  
**BILL ZAFEROPOLOS**  
**PO BOX 111**  
**ALLPORT PA 16821-0111**

*302*  
**PO BOX 15251**   
**WILMINGTON DE 19886-5251**  


Address, e-mail or telephone change? Print change in space  
above, or go to Discovercard.com. Print your e-mail address to  
receive important Account information and special offers.

000006011005300174052022086900000000028900

## Discover Card Account Summary

**EXHIBIT**  
*cl 17*

Closing Date: **October 16, 2006**

page 1 of 2

Account Number 6011 0053 0017 4052  
Payment Due Date November 15, 2006  
Minimum Payment Due \$289.00  
Credit Limit \$1,500.00  
Credit Available \$-708.00  
Cash Credit Limit \$800.00  
Cash Credit Available \$0.00

Previous Balance	\$2,080.54
Payments And Credits	- 0.00
Purchases	+ 78.00
Cash Advances	+ 0.00
Balance Transfers	+ 0.00
Finance Charges	+ 50.15
New Balance	= \$2,208.69

You may be able to avoid Periodic Finance Charges, see the  
reverse side for details.

## Cashback Bonus®

Opening Cashback Bonus Balance	\$ 18.74
New Cashback Bonus Earned	+ 0.00

Cashback Bonus Balance Available to Redeem	\$ 18.74
	- 0.00

Cashback Bonus® Anniversary  
Date: February 16

## How Can We Help You?

Please have your Discover Card available.

Manage your account online at Discovercard.com

Customer Service: 1-800-DISCOVER (1-800-347-2683)

For Account Inquiries, write to us at:

Discover Card, PO Box 30943  
Salt Lake City, UT 84130

TDD (Telecommunications Device for the Deaf):

For assistance, see reverse side.

## Transactions

**\$0 Fraud Liability Guarantee** Use your Discover Card with confidence.

	Trans. Date	Post Date		
Other/Miscellaneous	Oct 16	Oct 16	OVERLIMIT FEE	\$ 39.00
	Oct 16	Oct 16	LATE FEE	39.00

## Information For You

The address provided in your Cardmember Agreement to request a beneficiary designation form for your Scheduled Air Travel Accident Insurance has changed. The new address is AIG Accident & Health Division, 300 South Riverside Plaza, Suite 2100, Chicago, Illinois 60606-6613.

While we are permitted under the Cardmember Agreement to increase the APRs on your Account because your payment was late, we have chosen not to do so at this time. We have terminated, however, any introductory or promotional rate on purchases and any special balance transfer rate, and applied the standard APR for purchases to your outstanding balance of purchases and balance transfers. However, we reserve the right to increase the APRs on your Account if you fail to pay the minimum payment due by the payment due date. See the Default Rate Plan section of the Cardmember Agreement for details.

\*\*\*\*\* ATTENTION \*\*\*\*\* ATTENTION \*\*\*\*\* ATTENTION \*\*\*\*\* ATTENTION \*\*\*\*\*  
ATTENTION \*\*\*\*\* Your account is seriously past due. Payment of the amount due and arrangements for future payments should be made immediately.


VERIFICATION

The undersigned does hereby verify subject to the penalties of 18 PA.C.S. §4904 relating to unsworn falsifications to authorities, that he is Robert Adkins,

(Name)

Accounts Manager of Discover Financial Services, LLC., plaintiff herein, that  
(Title) (Company)

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

  
(Signature)

WWR # 5638108  
BILL R ZAFEROPOLOS  
6011005300174052

# In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 1 of 1 Services

Sheriff Docket # **102541**

DISCOVER BANK

Case # 07-364-CD

vs.

BILL R. ZAFEROPOLOS aka WILLIAM R. ZAFEROPOLOS

TYPE OF SERVICE COMPLAINT

## SHERIFF RETURNS

NOW July 20, 2007 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT "NOT FOUND" AS TO BILL R. ZAFEROPOLOS AKA WILLIAM R. ZAFEROPOLOS, DEFENDANT. NO SUCH ADDRESS.

SERVED BY: /

## Return Costs


PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	WELTMAN	8407934	10.00
SHERIFF HAWKINS	WELTMAN	8407934	29.52

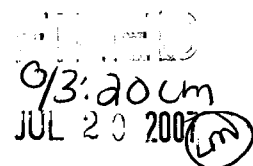
Sworn to Before me This

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

\_\_\_\_\_

So Answers,

  
Chester A. Hawkins  
Sheriff

  
JUL 20 2007

William A. Shaw  
Prothonotary/Clerk of Courts



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

MAR 09 2007

Attest.

*William A. Brown*  
Prothonotary/  
Clerk of Courts

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

DISCOVER BANK

Plaintiff

No: 2007- 364- CO

vs.

COMPLAINT IN CIVIL ACTION

BILL R ZAFEROPOLOS  
AKA WILLIAM R ZAFEROPOLOS

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  
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05638108 C A Pit WLG

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

DISCOVER BANK

Plaintiff

vs.

Civil Action No

BILL R ZAFEROPOLOS  
AKA WILLIAM R ZAFEROPOLOS

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.

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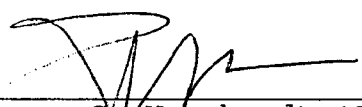
COURT ADMINISTRATOR  
CLEARFIELD COUNTY COURTHOUSE  
230 EAST MARKET ST., SUITE 228  
CLEARFIELD, PA 16830  
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6390 AYLESWORTH  
ALLPORT, PA 16821
3. Defendant applied for and received a credit card issued by  
Plaintiff bearing the account number 6011005300174052 . A copy of \_\_\_\_\_  
Plaintiff's Statement of Account s attached hereto, marked as Exhibit  
"A" and made a part hereof.
4. Defendant made use of said credit card and currently has a balance  
due and owing to Plaintiff, as of January 18, 2007 , in the amount of  
\$2208.69 .
5. Defendant is in default by failing to make payments when due.
6. Plaintiff avers that the Agreement between the parties provides  
that Defendant will pay Plaintiff's attorneys' fees.
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James C. Warmbrodt, 42524  
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436 Seventh Avenue, Suite 2718  
Pittsburgh, PA 15219  
(412) 434-7955  
FAX: 412-338-7130  
05638108 C A Pit WLG

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.



New Balance  
\$2,208.69

Minimum Payment Due  
\$289.00

Account Number 6011 0053 0017 4052  
Enter Amount Enclosed Below

Payment Due Date  
November 15, 2006

\$ 5638108

Please make check payable to Discover Card.  
You are overlimit. Pay the sum of the monthly  
minimum payment plus the overlimit amount of  
\$708.69.

16 SDSN6A01 0004627  
BILL ZAFEROPOLOS  
PO BOX 111  
ALLPORT PA 16821-0111

Consolidate bills quickly and securely  
with a Balance Transfer to your Discover  
Card - Call 1-877-353-0989 or visit  
Discovercard.com/balancetransfer TODAY!

PO BOX 15251  
WILMINGTON DE 19886-5251

Address, e-mail or telephone change? Print change in space  
above, or go to Discovercard.com. Print your e-mail address to  
receive important Account information and special offers.

000006011005300174052022086900000000028900

## Discover Card Account Summary

Account Number 6011 0053 0017 4052  
Payment Due Date November 15, 2006  
Minimum Payment Due \$289.00  
Credit Limit \$1,500.00  
Credit Available \$708.00  
Cash Credit Limit \$800.00  
Cash Credit Available \$0.00

Closing Date: October 16, 2006

page 1 of 2

Previous Balance	\$2,080.54
Payments And Credits	- 0.00
Purchases	+ 78.00
Cash Advances	+ 0.00
Balance Transfers	+ 0.00
Finance Charges	+ 50.15
New Balance	= \$2,208.69

You may be able to avoid Periodic Finance Charges, see the  
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## Cashback Bonus®

Opening Cashback Bonus Balance	\$ 18.74
New Cashback Bonus Earned	+ 0.00

Cashback Bonus Balance	\$ 18.74
Available to Redeem	- 0.00

Cashback Bonus® Anniversary  
Date: February 16

## How Can We Help You?

Please have your Discover Card available.

Manage your account online at Discovercard.com

Customer Service: 1-800-DISCOVER (1-800-347-2683)

For Account Inquiries, write to us at:

Discover Card, PO Box 30943  
Salt Lake City, UT 84130

TDD (Telecommunications Device for the Deaf):

For assistance, see reverse side.

## Transactions

\$0 Fraud Liability Guarantee Use your Discover Card with confidence.

	Trans. Date	Post Date		
Other/Miscellaneous	Oct 16	Oct 16	OVERLIMIT FEE	\$ 39.00
	Oct 16	Oct 16	LATE FEE	39.00

## Information For You

The address provided in your Cardmember Agreement to request a beneficiary designation form for your Scheduled Air Travel Accident Insurance has changed. The new address is AIG Accident & Health Division, 300 South Riverside Plaza, Suite 2100, Chicago, Illinois 60606-6613.

While we are permitted under the Cardmember Agreement to increase the APRs on your Account because your payment was late, we have chosen not to do so at this time. We have terminated, however, any introductory or promotional rate on purchases and any special balance transfer rate, and applied the standard APR for purchases to your outstanding balance of purchases and balance transfers. However, we reserve the right to increase the APRs on your Account if you fail to pay the minimum payment due by the payment due date. See the Default Rate Plan section of the Cardmember Agreement for details.

\*\*\*\*\* ATTENTION \*\*\*\*\* ATTENTION \*\*\*\*\* ATTENTION \*\*\*\*\* ATTENTION \*\*\*\*\*  
ATTENTION \*\*\*\*\* Your account is seriously past due. Payment of the amount due and arrangements for future payments should be made immediately.


VERIFICATION

The undersigned does hereby verify subject to the penalties of 18 PA.C.S. §4904 relating to unsworn falsifications to authorities, that he is Robert Adkins,

(Name)

Accounts Manager of Discover Financial Services, LLC., plaintiff herein, that  
(Title) (Company)

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

  
(Signature)

WWR # 5638108  
BILL R ZAFEROPOLOS  
6011005300174052

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

DISCOVER BANK

Plaintiff

vs.

BILL R ZAFEROPOLOS

Defendant

No. 2007-364-CD

PRAECIPE TO REINSTATE COMPLAINT

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#05638108

FILED <sup>CK</sup> NO cc  
m/j: 26/07  
JUL 30 2007 Atty pd. 7.00  
William A. Shaw  
Prothonotary/Clerk of Courts  
1 Complaint  
Reinstated to  
Sheriff

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

DISCOVER BANK

Plaintiff

vs.

Civil Action No. 2007-364-CD

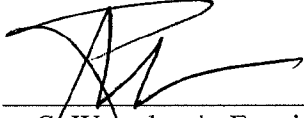
BILL R ZAFEROPOLOS

Defendant

**PRAECIPE TO REINSTATE COMPLAINT**

Kindly reinstate the Complaint in the above captioned matter.

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

By:   
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 #05638108



UK  
**FILED**  
NOV 21 2007  
11:20 AM  
William A. Shaw  
Prothonotary/Clerk of Courts  
No. 9/C

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

DISCOVER BANK

Plaintiff

No. 2007-364-CD

vs.

**MOTION FOR ALTERNATE SERVICE**

BILL R ZAFEROPOLOS AKA  
WILLIAM R ZAFEROPOLOS

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

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

DISCOVER BANK

Plaintiff

No. 2007-364-CD

vs.

BILL R ZAFEROPOLOS AKA  
WILLIAM R ZAFEROPOLOS

Defendant

**PLAINTIFF'S MOTION FOR ALTERNATE SERVICE**

AND NOW, comes Plaintiff, by counsel, Weltman, Weinberg & Reis Co., L.P.A. and requests this Honorable Court to enter an Order allowing the Plaintiff to make service upon Defendant, BILL R ZAFEROPOLOS, by certified U.S. Mail and Certificate of Mailing, addressed to 98 Mulch Ln, Morrisdale, Pa 16858, averring in support thereof the following:

1. On or about JULY 30, 2007, Plaintiff filed a Complaint in Civil Action against Defendant to recover the unpaid balance due Plaintiff from Defendant in the amount of \$2208.69.
2. When the Sheriff of CLEARFIELD County, Pennsylvania, attempted to make service of Plaintiff's Complaint on Defendant, the Sheriff was unable to do so, as evidenced by the Sheriff's return, a true and correct copy of which is attached hereto, marked Exhibit "1", and made a part hereof.
3. Upon receipt of the Sheriff's return of no service, Plaintiff conducted an investigation with the United States Postal Service to confirm the physical address of the Defendant.

4. Pursuant to Plaintiff's request for information, the United States Postal Service confirmed Defendant's physical address of 98 Mulch Ln, Morrisdale, Pa 16858, a true and correct copy of Plaintiff's Postal Request is attached hereto, marked as Exhibit "2", and made a part hereof.

5. Plaintiff conducted an online white pages search and was unable to confirm a current address for Defendant of 98 Mulch Ln, Morrisdale, Pa 16858.

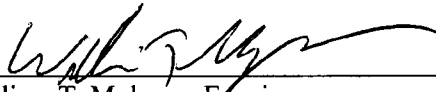
6. Plaintiff contacted the CLEARFIELD County Tax Assessment office, a representative from which could not confirm the Defendant's current physical address as 98 Mulch Ln, Morrisdale, Pa 16858.

7. Upon receipt of the Sheriff's return of no service, Plaintiff conducted an investigation with the LexisNexis Total Research System to confirm the physical address of the Defendant.

8. Pursuant to Plaintiff's request for information, LexisNexis Total Research System confirmed Defendant's physical address of 98 MULCH LN, MORRISDALE, PA 16858, a true and correct copy of the LexisNexis search results is attached hereto, marked as Exhibit "3", and made a part hereof.

9. Based upon the foregoing, Plaintiff believes and therefore avers that Defendant is attempting to avoid service of process in the above-captioned matter and Plaintiff therefore seeks an Order of Court, pursuant to Pennsylvania Rule of Civil Procedure 430, granting Plaintiff leave to serve its Complaint on Defendant by alternative means.

WHEREFORE, Plaintiff requests this Honorable Court to enter an Order pursuant to PA.R.C.P. 430(a), authorizing the Plaintiff to serve Defendant by Certified U.S. Mail and Certificate of Mailing sent to an address (98 Mulch Ln, Morrisdale, Pa 16858) at which Defendant is presently receiving mail according to information obtained from the Post Office, or by allowing service by a competent adult.



---

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

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 1 of 1 Services

Sheriff Docket # **102541**

DISCOVER BANK

Case # 07-364-CD

vs.

BILL R. ZAFEROPOLOS aka WILLIAM R. ZAFEROPOLOS

COPY

TYPE OF SERVICE COMPLAINT

SHERIFF RETURNS

NOW July 20, 2007 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT "NOT FOUND" AS TO BILL R. ZAFEROPOLOS AKA WILLIAM R. ZAFEROPOLOS, DEFENDANT. NO SUCH ADDRESS.

SERVED BY: /

EXHIBIT

1

Return Costs

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	WELTMAN	8407934	10.00
SHERIFF HAWKINS	WELTMAN	8407934	29.52

Sworn to Before me This

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

So Answers,



Chester A. Hawkins  
Sheriff

5638108

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

ATTORNEYS AT LAW  
2718 Koppers Building  
436 Seventh Avenue  
Pittsburgh, Pennsylvania 15219  
412.434.7955  
www.weltman.com

BURLINGTON, NJ  
609.914.0437  
CHICAGO, IL  
847.940.9812  
CINCINNATI, OH  
513.723.2200  
CLEVELAND, OH  
216.685.1000  
COLUMBUS, OH  
614.228.7272  
DETROIT, MI  
248.362.6100  
PHILADELPHIA, PA  
215.599.1500

WILLIAM T. MOLCZAN  
Attorney at Law  
412.434.7955  
Fax 412.434.7959  
wmolczan@weltman.com



August 22, 2007

**EXHIBIT**

2

Postmaster  
MORRISDALE, PA 16858

Request for Change of Address or Boxholder Information Needed for Service of Legal Process

Please furnish the new address or the name and street address (if a boxholder) for the following:

Name: BILL R ZAFEROPOLOS  
Address: 98 MULCH LN  
MORRISDALE, PA 16858

NOTE: The name and last known address are required for change of address information. The name, if known, and post office box address are required for boxholder information.

The following information is provided in accordance with 39 CFR 262.6(d)(6)(ii). There is no fee for providing boxholder information. The fee for providing change of address information is waived in accordance with 39 CFR 265.6(d)(1) and (2) and corresponding Administrative Support Manual 352.44a and b.

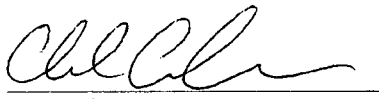
1. Capacity of requester: William T. Molczan, Esquire, Attorney for Plaintiff, DISCOVER BANK
2. Statute or regulation that empowers me to serve process: N/A
3. The names of all known parties to the litigation: DISCOVER BANK vs. BILL R ZAFEROPOLOS
4. The Court in which the case has been or will be heard: Court of Common Pleas of CLEARFIELD COUNTY
5. The docket or other identifying number if one has been issued: 2007-364-CD

The capacity in which this individual is to be served: Defendant

**WARNING**

THE SUBMISSION OF FALSE INFORMATION TO OBTAIN AND USE CHANGE OF ADDRESS INFORMATION OR BOXHOLDER INFORMATION FOR ANY PURPOSE OTHER THAN THE SERVICE OF LEGAL PROCESS IN CONNECTION WITH ACTUAL OR PROSPECTIVE LITIGATION CONSTITUTES A CRIMINAL OFFENSE. PENALTIES INCLUDE A FINE OF UP TO \$10,000 OR IMPRISONMENT OF (2) TO AVOID PAYMENT OF THE FEE FOR CHANGE OF ADDRESS INFORMATION OF 10% MORE THAN 5 YEARS, OR BOTH (TITLE 18 U.S.C. SECTION 1001).

I certify that the above information is true and that the address information is needed and will be used solely for service of legal process in connection with actual or prospective litigation.

  
Chad B. Carlson

WELTMAN, WEINBERG & REIS CO., L.P.A.  
2718 Koppers Building  
436 Seventh Avenue  
Pittsburgh, PA 15219

**FOR POST OFFICE USE ONLY**

**BOXHOLDER'S POSTMARK**

- ☐ Not known or address given.  
☐ Moved, left no forward address.  
☐ No such address.  
☐ No change of address on file.  
☒ Good as Addressed

**XXX PLEASE INDICATE PHYSICAL ADDRESS**

NEW ADDRESS or NAME and STREET ADDRESS

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



WW/R#05638108

## LexisNexis® Total Research System

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My Lexis™ Search Research Tasks Get a Document Shepard's® Alerts

History | Source: Public Records > SmartLinx(TM) > SmartLinx(TM) - Person Summary Reports 

Terms: [REDACTED] (Edit Search)

Permissible Uses: DPPA - 1. Litigation  
GLBA - 2. Legal Compliance[Click to visualize this report](#)**EXHIBIT****3**

[Subject Summary](#) | [Others Using SSN](#) | [Address Summary \(12\)](#) | [Voter Registrations \(2\)](#)  
[Licenses \(7\)](#) | [Personal Property \(4\)](#) | [Real Property \(2\)](#) | [Bankruptcies](#) | [Judgments & Liens](#)  
[Relatives \(10\)](#) | [Associated Entities \(3\)](#) | [Neighbors \(2\)](#) | [Sources \(39\)](#)

FOR INFORMATIONAL PURPOSES ONLY  
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a division of Reed Elsevier Inc. All Rights Reserved

Full Name	Address	County	Phone
ZAFEROPOLOS, WILLIAM R	98 MULCH LN MORRISDALE, PA 16858-7510 COUNTY: CLEARFIELD	CLEARFIELD	[REDACTED]

**ADDITIONAL PERSONAL INFORMATION**

SSN	DOB	GENDER
[REDACTED] (OHIO: 1988-1989)	04/1977 (Age: 30)	Male

**Subject Summary**

[Back To Top](#)  
[Name Variations \(4\)](#) | [SSNs Summary \(1\)](#) | [DOBs \(2\)](#)

**Name Variations**[View Name Variation Sources](#)

- 1: ZAFEROPOLOS, WILLIAM R
- 2: ZAFEROPOLOS, BILL R
- 3: ZAFEROPOLOS, WILLIAM
- 4: ZEFEROPOLIS, WILLIAM R

**SSNs Summary**[View SSN Sources](#)

No.	SSN	State Iss.	Date Iss.	Warnings
1:	[REDACTED]	OHIO	1988-1989	

**DOBs**[View DOB Sources](#)

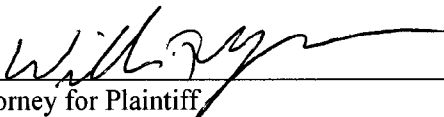
- 1: 04/1977
- 2: 04/1977

**Address Summary**[Back To Top](#)**Address Summary - 12 records found for subject:**[View Address Sources](#)

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the within Motion for Alternate Service was served on the 16 day of Nov, 2007, by first class, U.S. Mail, postage-prepaid, addressed as follows:

BILL R ZAFEROPOLOS  
98 Mulch Ln  
Morrisdale, Pa 16858

  
\_\_\_\_\_  
Attorney for Plaintiff.



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

DISCOVER BANK

NO. 2007-364-CD

Plaintiff

vs.

BILL R ZAFEROPOLOS AKA  
WILLIAM R ZAFEROPOLOS

Defendant

**AFFIDAVIT PURSUANT TO PA R.C.P. 430 (a)**

BEFORE ME, a Notary Public, in and for the foregoing County and Commonwealth, personally appeared William T. Molczan, Esquire, of Weltman, Weinberg & Reis, Co., L.P.A., attorneys for Plaintiff, and deposes and says that the following accurately reflects efforts made to ascertain the exact whereabouts of Defendant named in the above-captioned matter.

a. Plaintiff requested current address information from the United States Postal Service, which request for information confirmed the current address for Defendant as being 98 Mulch Ln, Morrisdale, Pa 16858. A true and correct copy of the Postal Service Return is marked Exhibit "2" attached hereto and made a part hereof.

b. Plaintiff requested current address information from the LexisNexis Total Research System, which request for information confirmed the current address for Defendant as being 98 MULCH LN, MORRISDALE, PA 16858. A true and correct copy of the LexisNexis search results is marked Exhibit "3" attached hereto and made a part hereof.

c. Plaintiff conducted an online tax-assessment search for the address of the Defendant that could not confirm the address as being 98 Mulch Ln, Morrisdale, Pa 16858.

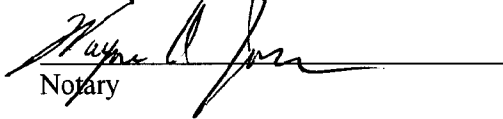
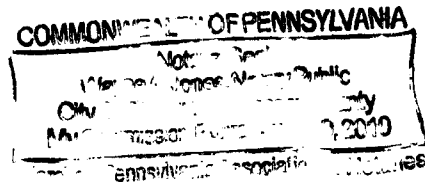
Finally, Affiant deposes and says that after the foregoing investigation, the exact whereabouts of the Defendant, BILL R ZAFEROPOLOS, is 98 Mulch Ln, Morrisdale, Pa 16858.

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



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

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

  
Notary

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

DISCOVER BANK

Plaintiff

No. 2007-364-CD

vs.

BILL R ZAFEROPOLOS AKA  
WILLIAM R ZAFEROPOLOS

ORDER OF COURT

AND NOW, to-wit, this 26<sup>th</sup> day of Nov., 2007, upon consideration of the foregoing Motion for Service of the Complaint Pursuant to Special Order of Court and attached supporting affidavit, it is hereby ORDERED, ADJUDGED AND DECREED, that the service of the Complaint in Civil Action may be made on Defendant, BILL R ZAFEROPOLOS, by permitting the Plaintiff to mail a copy of the Complaint to the Defendant the last known address being 98 Mulch Ln, Morrisdale, Pa 16858 by Certified Mail and *by* by Certificate of Mailing Postal Form 3817, postage prepaid. Service to be completed upon mailing.

BY THE COURT:



*regular mail FSA*

FILED  
11:54 AM  
NOV 27 2007  
William A. Shaw  
Prothonotary/Clerk of Courts  
1cc Atty Molczan

WWR #5638108

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103037  
NO: 07-364-CD  
SERVICE # 1 OF 1  
COMPLAINT

PLAINTIFF: DISCOVER BANK

vs.

DEFENDANT: BILL R. ZAFEROPOLOS aka WILLIAM R. ZAFEROPOLOS

SHERIFF RETURN

NOW, August 03, 2007 AT 10:39 AM SERVED THE WITHIN COMPLAINT ON BILL R. ZAFEROPOLOS aka WILLIAM R. ZAFEROPOLOS DEFENDANT AT 98 MULCH LN, MORRISDALE, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO JULIE WILLIAMS, ADULT AT RESIDENCE A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: HUNTER / DEHAVEN

FILED  
0/3:45 am  
DEC 19 2007

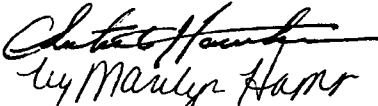
William A. Shaw  
Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	WELTMAN	8474561	10.00
SHERIFF HAWKINS	WELTMAN	8474561	21.61

Sworn to Before Me This

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

So Answers,

  
Chester A. Hawkins  
Sheriff

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

DISCOVER BANK

Plaintiff

vs.

BILL R ZAFEROPOLOS

Defendant

No. 2007-364-CD

PRAECIPE TO REINSTATE COMPLAINT

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#05638108

**FILED** pd \$7.00 Atty  
m/11:00am Reinstated Complaint  
FEB 19 2008 to Atty.  
William A. Shaw  
Prothonotary/Clerk of Courts

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

DISCOVER BANK

Plaintiff

vs.

Civil Action No. 2007-364-CD

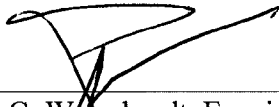
BILL R ZAFEROPOLOS

Defendant

**PRAECIPE TO REINSTATE COMPLAINT**

Kindly reinstate the Complaint in the above captioned matter.

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

By:   
James C. Wainbrodt, 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 #05638108

MAR 09 2007

William A. Shaw  
Prothonotary/Clerk of Courts

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

DISCOVER BANK

Plaintiff

No: 2007-364-C0

vs.

COMPLAINT IN CIVIL ACTION

BILL R ZAFEROPOLOS  
AKA WILLIAM R ZAFEROPOLOS

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  
05638108 C A Pit WLG

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

DISCOVER BANK

Plaintiff

vs.

Civil Action No

BILL R ZAFERPOLOS  
AKA WILLIAM R ZAFERPOLOS

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

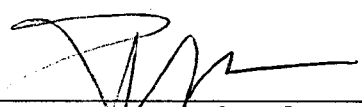


COMPLAINT

1. Plaintiff, is a corporation with offices at 6500 NEW ALBANY ROAD  
NEW ALBANY , OH 43054 .
2. Defendant is adult individual(s) residing at the address listed  
below:  
  
BILL R ZA FEROPOLOS  
6390 AYLESWORTH  
ALLPORT, PA 16821
3. Defendant applied for and received a credit card issued by  
Plaintiff bearing the account number 6011005300174052 . A copy of  
Plaintiff's Statement of Account s attached hereto, marked as Exhibit  
"A" and made a part hereof.
4. Defendant made use of said credit card and currently has a balance  
due and owing to Plaintiff, as of January 18, 2007 , in the amount of  
\$2208.69 .
5. Defendant is in default by failing to make payments when due.
6. Plaintiff avers that the Agreement between the parties provides  
that Defendant will pay Plaintiff's attorneys' fees.
7. Plaintiff avers that such attorneys' fees will amount to \$300.00 .

8. 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 , BILL R ZAFEROPOLOS , INDIVIDUALLY , in the amount of \$2208.69 with interest at the legal rate of 6.000% per annum from date of judgment plus attorneys' fees of \$300.00 , and 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  
05638108 C A Pit WLG

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.



New Balance  
\$2,208.69

Minimum Payment Due  
\$289.00

Account Number 6011 0053 0017 4052  
Enter Amount Enclosed Below

Payment Due Date  
November 15, 2006

\$ 5638108

Please make check payable to Discover Card.  
You are overlimit. Pay the sum of the monthly  
minimum payment plus the overlimit amount of  
\$708.69.

16 SDSN6A01 0004627  
BILL ZAFERPOLOS  
PO BOX 111  
ALLPORT PA 16821-0111

Consolidate bills quickly and securely  
with a Balance Transfer to your Discover  
Card - Call 1-877-353-0989 or visit  
Discovercard.com/balancetransfer TODAY!

PO BOX 15251  
WILMINGTON DE 19886-5251

Address, e-mail or telephone change? Print change in space  
above, or go to Discovercard.com. Print your e-mail address to  
receive important Account information and special offers.

000006011005300174052022086900000000028900

## Discover Card Account Summary

**EXHIBIT**

Closed Date: October 16, 2006

page 1 of 2

Account Number 6011 0053 0017 4052  
Payment Due Date November 15, 2006  
Minimum Payment Due \$289.00  
Credit Limit \$1,500.00  
Credit Available \$708.00  
Cash Credit Limit \$800.00  
Cash Credit Available \$0.00

Previous Balance	\$2,080.54
Payments And Credits	- 0.00
Purchases	+ 78.00
Cash Advances	+ 0.00
Balance Transfers	+ 0.00
Finance Charges	+ 50.15
New Balance	= \$2,208.69

You may be able to avoid Periodic Finance Charges, see the  
reverse side for details.

## Cashback Bonus®

Opening Cashback Bonus Balance	\$ 18.74
New Cashback Bonus Earned	+ 0.00

Cashback Bonus Balance	\$ 18.74
Available to Redeem	- 0.00

Cashback Bonus® Anniversary  
Date: February 16

## How Can We Help You?

Please have your Discover Card available.

Manage your account online at Discovercard.com

Customer Service: 1-800-DISCOVER (1-800-347-2683)

For Account Inquiries, write to us at:

Discover Card, PO Box 30943  
Salt Lake City, UT 84130

TDD (Telecommunications Device for the Deaf):

For assistance, see reverse side.

## Transactions

\$0 Fraud Liability Guarantee Use your Discover Card with confidence.

	Trans. Date	Post Date		
Other/Miscellaneous	Oct 16	Oct 16	OVERLIMIT FEE	\$ 39.00
	Oct 16	Oct 16	LATE FEE	39.00

## Information For You

The address provided in your Cardmember Agreement to request a beneficiary designation form for your Scheduled Air Travel Accident Insurance has changed. The new address is AIG Accident & Health Division, 300 South Riverside Plaza, Suite 2100, Chicago, Illinois 60606-6613.

While we are permitted under the Cardmember Agreement to increase the APRs on your Account because your payment was late, we have chosen not to do so at this time. We have terminated, however, any introductory or promotional rate on purchases and any special balance transfer rate, and applied the standard APR for purchases to your outstanding balance of purchases and balance transfers. However, we reserve the right to increase the APRs on your Account if you fail to pay the minimum payment due by the payment due date. See the Default Rate Plan section of the Cardmember Agreement for details.

\*\*\*\*\* ATTENTION \*\*\*\*\* ATTENTION \*\*\*\*\* ATTENTION \*\*\*\*\* ATTENTION \*\*\*\*\*  
ATTENTION \*\*\*\*\* Your account is seriously past due. Payment of the amount due and arrangements for future payments should be made immediately.

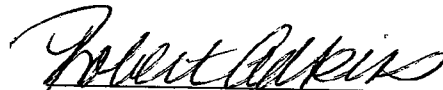
VERIFICATION

The undersigned does hereby verify subject to the penalties of 18 PA.C.S. §4904 relating to unsworn falsifications to authorities, that he is Robert Adkins,

(Name)

Accounts Manager of Discover Financial Services, LLC., plaintiff herein, that  
(Title) (Company)

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

  
(Signature)

WWR # 5638108  
BILL R ZAFEROPOLOS  
6011005300174052

FILED

MAR 10 2008  
11:30 W  
William A. Shaw  
Prothonotary/Clerk of Courts  
2 CEN to ATT

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

DISCOVER BANK

Plaintiff

No. 2007-364-CD

vs.

BILL R ZAFEROPOLOS

Defendant

AFFIDAVIT OF SERVICE OF COMPLAINT

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#05638108

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

DISCOVER BANK

Plaintiff

No. 2007-364-CD

vs.

BILL R ZAFEROPOLOS

Defendant

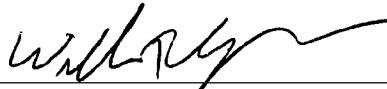
**AFFIDAVIT OF SERVICE OF COMPLAINT**

BEFORE ME, the undersigned authority, personally appeared William T. Molczan, Esquire, who according to law deposes and says that a copy of the Complaint in Civil Action has been served on the Defendant, BILL R ZAFEROPOLOS.

1. On or about NOVEMBER 26, 2007, Plaintiff received a signed Order of Court permitting service, on the Defendant, to be complete and valid upon mailing to the complaint by first class mail, certificate of mailing and by certified mail, return receipt requested. Said Order of Court is attached as Exhibit "1".

2. On or about FEBRUARY 27, 2008, Plaintiff mailed the complaint to BILL R ZAFEROPOLOS. Said certificate of mailing and certified mail receipts are attached as Exhibit "2".

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



William T. Molczan, Esquire

PA I.D. #47437

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

2718 Koppers Building

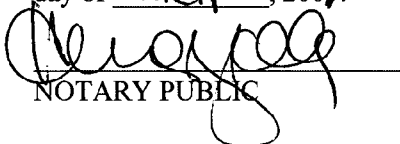
436 Seventh Avenue

Pittsburgh, PA 15219

(412) 434-7955

WWR#05638108

Sworn to and subscribed  
before me this 03  
day of March, 2008.

  
NOTARY PUBLIC

Court Clerk - ALTHOFF, J. L.  
Notary Public  
Helen J. Keith, Notary Public  
City Of Pittsburgh, Allegheny County  
My Commission Expires Nov. 4, 2010  
Member, Pennsylvania Notary Association

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

DISCOVER BANK

Plaintiff

No. 2007-364-CD

vs.

BILL R ZAFEROPOLOS AKA  
WILLIAM R ZAFEROPOLOS

ORDER OF COURT

AND NOW, to-wit, this 26<sup>th</sup> day of Nov., 2007, upon consideration of the foregoing Motion for Service of the Complaint Pursuant to Special Order of Court and attached supporting affidavit, it is hereby ORDERED, ADJUDGED AND DECREED, that the service of the Complaint in Civil Action may be made on Defendant, BILL R ZAFEROPOLOS, by permitting the Plaintiff to mail a copy of the Complaint to the Defendant the last known address being 98 Mulch Ln, Morrisdale, Pa 16858 by Certified Mail and *by* by Certificate of Mailing Postal Form 3817, postage prepaid. Service to be completed upon mailing.

*Regular  
Mail  
FJA/BH*

BY THE COURT:

/S/ Fredric J Ammerman

E. J. BH J.

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

NOV 27 2007

Attest.

*William R. Zafaropoulos*  
Prothonotary/  
Clerk of Courts

WWR #5638108

*CXL*

U.S. POSTAL SERVICE MAIL CERTIFICATE  
MAY BE USED FOR MAILING MAIL  
PROVIDE FOR INSURANCE - POSTMASTER

Received From:

2718 Koppers  
436 7th Av

Pittsburgh, PA

(412) 434-71

One piece of ordinary mail addressed to:

Bill R Zaferopoulos

98 Mulch Lane

Morrisdale, PA 16858

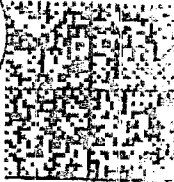
WVF -056 88 108

049J8204192

\$01.050

Rated From 15 21  
US POSTAGE

usps



FIRST CLASS

EXHIBIT

2

U.S. Postal Service™  
CERTIFIED MAIL™ RECEIPT  
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at [www.usps.com](http://www.usps.com)

OFFICIAL USE

Postage	\$ .58
Certified Fee	2.65
Return Receipt Fee (Endorsement Required)	2.15
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$5.38



Sent To  
Bill R Zaferopoulos  
Street, Apt. No.,  
or PO Box No. 98 Mulch Lane  
City, State, ZIP+4  
Morrisdale, PA 16858

PS Form 3800, August 2006

See Reverse for Instructions

EXHIBIT

2



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

DISCOVER BANK

Plaintiff

No. 2007-364-CD

vs.

PRAECIPE FOR DEFAULT JUDGMENT

BILL R ZAFEROPOLOS  
AKA WILLIAM R ZAFEROPOLOS

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

**FILED** *Atty pd. 20.00*  
*m/2:27:20*  
APR 16 2008 *ICC Notice*  
*to Def.*

William A. Shaw  
Prothonotary/Clerk of Courts

*Statement to Atty*  
*(CR)*

WWR#05638108  
Judgment Amount \$ 2508.69

**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

DISCOVER BANK

Plaintiff

vs.

Civil Action No. 2007-364-CD

BILL R ZAFEROPOLOS  
AKA WILLIAM R ZAFEROPOLOS

Defendant

**PRAECIPE FOR DEFAULT JUDGMENT**

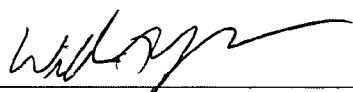
TO THE PROTHONOTARY:

Kindly enter Judgment against the Defendant, BILL R ZAFEROPOLOS  
AKA WILLIAM R ZAFEROPOLOS above named, in the default of an Answer, in the amount of \$2508.69  
computed as follows:

Amount claimed in Complaint	\$2208.69
Interest from date of judgment at the legal interest rate of 6% per annum	
Attorney's fees	\$300.00
TOTAL	\$2508.69

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. 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#05638108

Plaintiff's address is:

c/o Weltman, Weinberg & Reis Co., L.P.A., 2718 Koppers Building, 436 7<sup>th</sup> Avenue, Pittsburgh, PA 15219  
And that the last known address of the Defendant is: 98 MULCH LN MORRISDALE, PA 16858

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

DISCOVER BANK

Plaintiff

Case # 2007-364-CD

BILL R ZAFEROPOLOS

Defendant(s)

IMPORTANT NOTICE

TO: BILL R ZAFEROPOLOS  
98 MULCH LN  
MORRISDALE, PA 16858

Date of Notice: 03/28/08  
WWR#: 05638108

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 ADMINSTRATOR  
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.  
1400 KOPPERS BLDG, 436 7TH AVE.  
PITTSBURGH, PA 15219

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

DISCOVER BANK

Case no: 2007-364-CD

Plaintiff

**NON-MILITARY AFFIDAVIT**

vs.

BILL R ZAFEROPOLOS  
AKA WILLIAM R ZAFEROPOLOS

Defendant

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

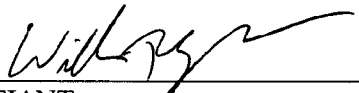
That he/she is the duly authorized agent of the Plaintiff in the within matter.

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.

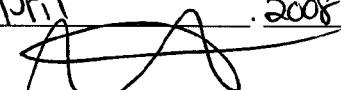
Affiant further states that based upon investigation it is the affiant's belief that the Defendant, BILL R ZAFEROPOLOS  
AKA WILLIAM R ZAFEROPOLOS is not in the military service.

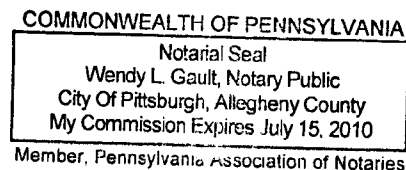
Affiant further states that this belief is supported by the attached certificate from the Defense Manpower Data Center (DMDC), which states that the Defendant, BILL R ZAFEROPOLOS  
AKA WILLIAM R ZAFEROPOLOS is not in the military service.

Further Affiant sayeth naught.

  
\_\_\_\_\_  
AFFIANT

SWORN TO AND SUBSCRIBED in my presence this 11 day  
of April, 2008.

  
\_\_\_\_\_  
NOTARY PUBLIC



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.

Department of Defense Manpower Data Center

APR-09-2008 12:53:09



Military Status Report  
Pursuant to the Servicemembers Civil Relief Act

◀ Last Name	First/Middle	Begin Date	Active Duty Status	Service/Agency
ZAFEROPOLOS		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. §§ 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: **BUUXCUDJEFR***

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

COPIES

DISCOVER BANK

Plaintiff

vs.

Civil Action No. 2007-364-CD

BILL R ZAFEROPOLOS

AKA WILLIAM R ZAFEROPOLOS

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 4/16/08

(xx)    Assumpsit Judgment in the amount  
         of \$2508.69 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.

(xx)    Entry of Judgment of  
         ☐ Court Order  
         ☐ Non-Pros  
         ☐ Confession  
         (xx) Default  
         ☐ Verdict  
         ☐ Arbitration  
         Award

Prothonotary



By: \_\_\_\_\_  
PROTHONOTARY (OR DEPUTY)

BILL R ZAFEROPOLOS  
AKA WILLIAM R ZAFEROPOLOS  
98 MULCH LN  
MORRISDALE, PA 16858

Plaintiff's address is:  
c/o Weltman, Weinberg & Reis Co., L.P.A., 2718 Koppers Building, 436 7<sup>th</sup> Avenue, Pittsburgh, PA 15219  
1-888-434-0085

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY ,  
PENNSYLVANIA  
STATEMENT OF JUDGMENT

Discover Card  
Plaintiff(s)

No.: 2007-00364-CD

Real Debt: \$2,508.69

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Bill R. Zaferopolos a/k/a  
William R. Zaferopolos  
Defendant(s)

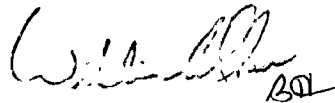
Entry: \$20.00

Instrument: Default Judgment

Date of Entry: April 16, 2008

Expires: April 16, 2013

Certified from the record this 16th day of April, 2008.



William A. Shaw, Prothonotary

\*\*\*\*\*

SIGN BELOW FOR SATISFACTION

Received on \_\_\_\_\_, \_\_\_\_\_, of defendant full satisfaction of this Judgment,  
Debt, Interest and Costs and Prothonotary is authorized to enter Satisfaction on the same.

\_\_\_\_\_  
Plaintiff/Attorney