

07-539-CD

Discover Bank vs Joni Digilarmo

Discover Bank vs Joni Digilarmo
2007-539-CD

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

FILED

APR 05 2007 ^{FD}

W. A. Shaw
William A. Shaw
Prothonotary/Clerk of Courts
1 CENT TO ATT
1 CENT TO SUP

DISCOVER BANK

(Plaintiff)

Apothaker & Associates, P.C.

2417 Welsh Road
(Street Address)

Suite 21 #520
Philadelphia, PA 19114

(City, State ZIP)

CIVIL ACTION

No. 2007-539-CO

Type of Case: _____

Type of Pleading: COMPLAINT

VS.

JONI DIGILARMO

(Defendant)

145 HICKORY ROAD

(Street Address)

DUBOIS, PA 15801-4149

(City, State ZIP)

Filed on Behalf of:

PLAINTIFF

(Plaintiff/Defendant)

DAVID J. APOTHAKER, ESQ.

(Filed by)

Apothaker & Associates, P.C.

2417 Welsh Road

Suite 21 #520

Philadelphia, PA 19114

(Address)

215-634-8920

(Phone)


(Signature)

CLEARFIELD COUNTY BAR ASSOCIATION
Lawyer Referral and Information Service
814-765-2641

APOTHAKE & ASSOCIATES, P.C.
BY: David J. Apothaker, Esq.
Attorney I.D.#38423
2417 Welsh Road, Suite 21 #520
Philadelphia, PA 19114
(215) 634-8920
Attorneys for Plaintiff

DISCOVER BANK)	COURT OF COMMON PLEAS
c/o Apothaker & Associates, P.C.)	CLEARFIELD COUNTY
2417 Welsh Road, Suite 21 #520)	
Philadelphia, PA 19114)	NO.:
Plaintiff,)	
vs.)	
)	
JONI E DIGILARMO)	
145 HICKORY RD)	
DU BOIS, PA 15801-4149)	
Defendant.)	
)	

CIVIL ACTION COMPLAINT
FIRST COUNT

1. Plaintiff, DISCOVER BANK, is a company with its principal place of business located at c/o Apothaker & Associates, P.C., 2417 Welsh Road, Suite 21 #520, Philadelphia, PA 19114.
2. Defendant is JONI E DIGILARMO, an adult individual residing at 145 HICKORY RD DU BOIS, PA 15801-4149.
3. At the special instance and request of Defendant, Plaintiff sold and delivered to Defendant goods and/or services at the times, of the kinds, in the quantities, and for the prices set forth in Plaintiff's records. A true and correct copy of which is attached hereto, incorporated herein by reference and designated Exhibit "A".
4. Defendant received and accepted the goods and/or services described in Exhibit "A".
5. The prices set forth in Exhibit "A" are the fair, reasonable and market prices for said goods and/or services, and the prices which Defendant agreed to pay.
6. All credits, if any, to which Defendant is entitled, are set forth in Exhibit "A".
7. In addition, Plaintiff avers that Defendant has failed and continues to fail to make any payments, leaving a balance due and owing of \$13,371.30 from September 16, 2005.

8. Although demand has been made, Defendant has failed to make payment of the amount due as above.

WHEREFORE, Plaintiff demands judgment in favor of Plaintiff and against Defendant(s) for the sum of \$13,371.30 plus costs, and reasonable attorney's fees.

APOTHAKER & ASSOCIATES, P.C.
Attorney for Plaintiff
A Law Firm Engaged in Debt Collection

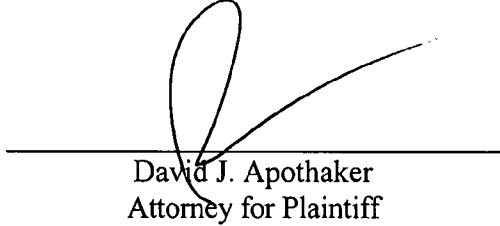
BY: 
David J. Apothaker

Dated: 3/22/2007

Our File No.: 91503

VERIFICATION

David J. Apothaker, Esq. hereby states that I am counsel for plaintiff in this action, and that I am authorized to take this Verification, and that the statements made in the foregoing Civil Action Complaint are true and correct to the best of my knowledge, information, and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 Pa.C.S.A. 4904 relating to unsworn falsification to authorities.



David J. Apothaker
Attorney for Plaintiff

DATE: 3/22/2007

DISCOVER BANK
c/o Apothaker & Associates, P.C.
2417 Welsh Road, Suite 21 #520
Philadelphia, PA 19114

JONI E DIGILARMO
145 HICKORY RD
DU BOIS, PA 15801-4149

STATEMENT OF ACCOUNT

Debtor's Name:	JONI E DIGILARMO
Account Number:	6011002360340046
Date of Debt:	September 16, 2005
Balance Due:	\$13,371.30

Our File No.: 91503

EXHIBIT "A"

William A. Shaw
Prothonotary/Clerk of Courts

1 4

**IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA**

CIVIL DIVISION

Discover Bank

Vs.

No. 2007-00539-CD

Joni E. Digilarmo

CERTIFICATE OF DISCONTINUATION

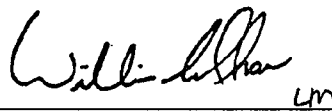
Commonwealth of PA
County of Clearfield

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 May 9, 2007, marked:

Dismiss without prejudice

Record costs in the sum of \$85.00 have been paid in full by Apothaker & Associates.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 9th day of May A.D. 2007.



William A. Shaw, Prothonotary

COPY

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102656
NO: 07-539-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: DISCOVER BANK
vs.
DEFENDANT: JONI DIGILARMO

SHERIFF RETURN

NOW, April 17, 2007 AT 1:10 PM SERVED THE WITHIN COMPLAINT ON JONI DEGILARMO DEFENDANT AT 145 HICKORY ROAD, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO CHRIS DIGILARMO, HUSBAND A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: NEVLING / COUDRIET

FILED

03:22 PM
AUG 22 2007

William A. Shaw
Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	APOTHAKE	44613G	10.00
SHERIFF HAWKINS	APOTHAKE	44613G	36.43

Sworn to Before Me This

_____ Day of _____ 2007

So Answers,

Chester A. Hawkins
by Marilyn Hamr

Chester A. Hawkins
Sheriff