

07-1307-CD  
HSBC Bank vs Drexel Demi

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

HSBC BANK NEVADA, N.A. AS

Plaintiff

No: 07-1307-CD

vs.

COMPLAINT IN CIVIL ACTION

DREXEL DEMI

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  
05732602 C N Pit ADU

FILED Atty pd. 85.00  
M 11/54/07  
AUG 13 2007  
Clerk Sheriff

William A. Shaw  
Prothonotary/Clerk of Courts

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

HSBC BANK NEVADA, N.A. AS

Plaintiff  
vs. Civil Action No  
DREXEL DEMI  
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, HSBC BANK NEVADA, N.A. AS is a corporation with offices at 1111 TOWN CENTER DRIVE LAS VEGAS , NV 89193 .

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

DREXEL DEMI  
33 SUNSET LN  
CURWENSVILLE, PA 16833

3. Defendant applied for and received a credit card bearing the account number 5458001674097492 .

4. Defendant made use of said credit card and has a current balance due of \$3219.68 , as of May 24, 2007 .

5. Defendant is in default by failing to make monthly payments when due. As such, the entire balance is immediately due and payable to Plaintiff.

6. Plaintiff is entitled to the addition of interest at the rate of 0.000% per annum on the unpaid balance from May 24, 2007 . A copy of Plaintiff's STATEMENT is attached hereto, marked as Exhibit "1" and made a part hereof.

7. Although repeatedly requested to do so by Plaintiff, Defendant has willfully failed and/or refused to pay the balance due to Plaintiff.

Wherefore, the Plaintiff prays for judgment in its favor and against Defendant , DREXEL DEMI , INDIVIDUALLY , in the amount of \$3219.68 with continuing interest thereon at the rate of 0.000% per annum from May 24, 2007 plus costs.

~~James C. Warmbrodt, 42524  
WELTMAN, WEINBERG & REIS CO., L.P.A.  
436 Seventh Avenue, Suite 2718  
Pittsburgh, PA 15219  
(412) 434-7955  
FAX: 412-338-7130  
05732602 C N Pit ADU~~

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.

# DIRECT MERCHANTS BANK®



CARDMEMBER SERVICES  
PO BOX 21550  
TULSA OK 74121-1550

Make Payments Payable To: HSBC Card Services

#### YOUR PAYMENT COUPON

STATEMENT DATE	NEW BALANCE	MINIMUM PAYMENT DUE	AMOUNT PAST DUE	PAYMENT MUST BE RECEIVED BY	ACCOUNT NUMBER 5458 0016 7409 7492
02/13/07	2,993.22	480.00	380.00	03/10/07	\$

New address or email? Check box. See reverse side.

SEND PAYMENTS TO:

DREXEL DEMI  
13 SUNSET LN  
CURWENSVILLE PA 16833-1555  
024  
129387

PAYMENT CENTER  
PO BOX 105278  
ATLANTA GA 30348-5278

545800167409749200048000002993221

Detach and insert this top portion in the enclosed envelope. Be sure the Payment Center address shows in the envelope window.

## DIRECT MERCHANTS BANK®

#### A VIEW OF YOUR RECENT CHARGES AND CREDITS

Pay Online, Anytime: [www.accountcentralonline.com](http://www.accountcentralonline.com)

TRANS DATE	POST DATE	REFERENCE NUMBER	DESCRIPTION	CREDITS	CHARGES
PURCHASES, CASH ADVANCES & FEES *FINANCE CHARGE*			PURCHASES \$36.16 CASH ADVANCE \$33.36		69.52

#### YOUR ACCOUNT SUMMARY - FEBRUARY

ACCOUNT AND PAYMENT INFORMATION		CREDIT LINE INFORMATION		ACCOUNT SUMMARY	
ACCOUNT NUMBER	5458 0016 7409 7492	TOTAL CREDIT LINE	\$ 2500	PREVIOUS BALANCE	\$ 2923.70
NEW BALANCE	2993.22	TOTAL AVAILABLE CREDIT	0	PURCHASES	+ 0.00
MINIMUM PAYMENT DUE	480.00	CASH ADVANCE CREDIT LIMIT*	1250	CASH ADVANCES	+ 0.00
AMOUNT PAST DUE	380.00	CASH ADVANCE AVAILABLE CREDIT	0	CREDITS	- 0.00
PAYMENT MUST BE		OVERLIMIT AMOUNT	493.22	PAYMENTS	- 0.00
RECEIVED BY	MAR 10, 2007	*CASH ADVANCE CREDIT LIMIT IS A PORTION OF YOUR TOTAL CREDIT LINE.		OTHER	+ 0.00
				FINANCE CHARGE	+ 69.52
				NEW BALANCE	= 2993.22

# EXHIBIT

CARDMEMBER SERVICE CENTER: 1-800-379-7999

PAYMENT BY PHONE: 877-2-PAY-CARD

FROM OUTSIDE THE U.S. CALL COLLECT: 904-997-4997, HEARING IMPAIRED-TDD CUSTOMERS CALL: 877-902-0967

SEND PAYMENTS TO: PAYMENT CENTER, PO BOX 105278, ATLANTA GA 30348-5278

MAIL INQUIRIES TO: CARDMEMBER SERVICES, PO BOX 21550, TULSA, OK 74121-1550

NOTICE: SEE REVERSE SIDE FOR IMPORTANT INFORMATION.

Pay Online, Anytime: [www.accountcentralonline.com](http://www.accountcentralonline.com)

#### A SUMMARY OF YOUR FINANCE CHARGES (EXCLUDING PROMOTIONAL OFFERS)

	AVERAGE DAILY BALANCE	DAILY PERIODIC RATE	MINIMAL ANNUAL PERCENTAGE RATE	FINANCE CHARGE	ANNUAL PERCENTAGE RATE	NUMBER OF DAYS IN BILLING CYCLE	STATEMENT CLOSING DATE
PURCHASES	1556.68	.08010 %	29.24 %	36.16	29.24 %		
CASH ADVANCES	1400.48	.08215 %	29.99 %	33.36	29.99 %	29	02/13/07

5994 0000 XPD 2 7 9 070213

E X Page 1 of 1

8800 1600 848P 01BT5994 129387

WHEN SENDING US YOUR PAYMENT...

ALWAYS INCLUDE YOUR ACCOUNT NUMBER ON THE CHECK

BE SURE TO SIGN YOUR CHECK

REMOVE THE TCP PORTION OF YOUR STATEMENT AND RETURN WITH YOUR

PAYMENT IN THE ENVELOPE PROVIDED

PAYMENT IS DUE BY THE DATE INDICATED IN THIS STATEMENT

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 Charmain Hopper 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 "Charmain Hopper".

(Signature)

Ww1#

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103097  
NO: 07-1307-CD  
SERVICE # 1 OF 1  
COMPLAINT

FILED

JAN 11 2008

o 1:30 (S)

William A. Shaw

Prothonotary/Clerk of Courts

PLAINTIFF: HSBC BANK NEVADA, N.A.  
vs.  
DEFENDANT: DREXEL DEMI

SHERIFF RETURN

NOW, August 15, 2007 AT 1:28 PM SERVED THE WITHIN COMPLAINT ON DREXEL DEMI DEFENDANT AT 33 SUNSET LN, CURWENSVILLE, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO DREXEL DEMI, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

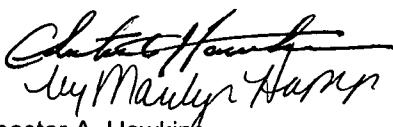
SERVED BY: DAVIS /

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	WELTMAN	2807714	10.00
SHERIFF HAWKINS	WELTMAN	2807714	23.82

Sworn to Before Me This

Day of 2008  
2007

So Answers,

  
Chester A. Hawkins  
Sheriff

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

HSBC BANK NEVADA NA

Plaintiff No. 07-1307-CD

vs. PRAECIPE FOR DEFAULT JUDGMENT

DREXEL DEMI

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.  
1400 Koppers Bldg.  
436 Seventh Avenue  
Pittsburgh, PA 15219  
(412) 434-7955

WWR#5732602  
Judgment Amount \$ 3400.16

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

FILED Atty pd \$20.00  
MAY 07 2008 ICC & Notice  
to Def.

William A. Shaw  
Prothonotary/Clerk of Courts Statement to Atty

(GR)

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

HSBC BANK NEVADA NA

Plaintiff

vs.

Civil Action No. 07-1307-CD

DREXEL DEMI

Defendant

**PRAECIPE FOR DEFAULT JUDGMENT**

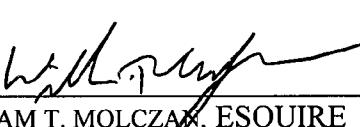
TO THE PROTHONOTARY:

Kindly enter Judgment against the Defendant, DREXEL DEMI above named, in the default of an Answer, in the amount of \$3400.16 computed as follows:

Amount claimed in Complaint	\$3219.68
Interest from May 24, 2007 to April 30, 2008 at the legal interest rate of 6.0% per annum	\$180.48
<b>TOTAL</b>	<b>\$3400.16</b>

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.  
1400 Koppers Bldg.  
436 Seventh Avenue  
Pittsburgh, PA 15219  
(412) 434-7955  
WWR#5732602

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: 33 SUNSET LN CURWENSVILLE PA 16833

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

HSBC BANK NEVADA NA

Plaintiff

vs.

Civil Action No. 07-1307-CD

DREXEL DEMI

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 5/7/08

Assumpsit Judgment in the amount  
of \$3400.16 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-Pro  
 Confession  
 Default  
 Verdict  
 Arbitration  
Award

Prothonotary

By: William Weltman  
PROTHONOTARY (OR DEPUTY)

SEIDEMAN LAW FIRM  
PO BOX 1900  
RANCHO CUCAMONGA CA 91729

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 CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL DIVISION

HSBC BANK NEVADA, N.A. AS

Plaintiff

Case # 07-1307-CD

DREXEL DEMI

Defendant(s)

IMPORTANT NOTICE

TO: DREXEL DEMI  
33 SUNSET LN  
CURWENSVILLE, PA 16833

Date of Notice: 03/26/08  
WWR#: 05732602

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

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

HSBC BANK NEVADA NA

Case no: 07-1307-CD

Plaintiff  
vs.  
NON-MILITARY AFFIDAVIT

DREXEL DEMI

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, DREXEL DEMI is not in the military service.

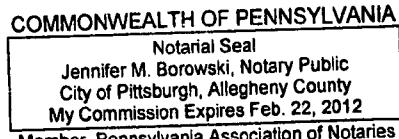
Affiant further states that this belief is supported by the attached certificate from the Defense Manpower Data Center (DMDC), which states that the Defendant, DREXEL DEMI is not in the military service.

Further Affiant sayeth naught.

  
AFFIANT

SWORN TO AND SUBSCRIBED in my presence this 1 day  
of May 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-30-2008 09:08:43



Military Status Report  
Pursuant to the Servicemembers Civil Relief Act

Last Name	First/Middle	Begin Date	Active Duty Status	Service/Agency
DEMI	DREXEL		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:HOALMNWFSA*

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

HSBC Bank Nevada, N.A.  
Plaintiff(s)

No.: 2007-01307-CD

Real Debt: \$3,400.16

Atty's Comm: \$

Vs. Costs: \$

Int. From: \$

Drexel Demi  
Defendant(s)

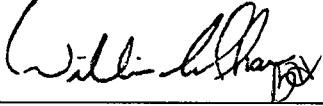
Entry: \$20.00

Instrument: Default Judgment

Date of Entry: May 7, 2008

Expires: May 7, 2013

Certified from the record this 7th day of May, 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

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

BY: Benjamin R. Bibler, Esquire  
I.D. No.93598  
436 Seventh Avenue, Suite 1400  
Pittsburgh, PA 15219  
Phone: 412.434.7955  
Fax: 412.434.7959  
File # 5732602 JAM

Attorney for Plaintiff(s)

pd \$7.00  
Atty  
m/ 1.48cm ICC Atty  
JAN 20 2011 Bibler  
S  
William A. Shaw  
Prothonotary/Clerk of Courts

HSBC BANK NEVADA, N.A. AS

Clearfield County  
Court of Common Pleas

vs.

DREXEL DEMI

NO. 07-1307-CD

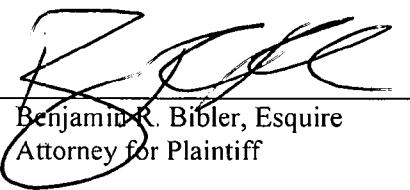
**PRAECIPE FOR SATISFACTION OF JUDGMENT**

TO THE PROTHONOTARY:

Please kindly Satisfy the Judgment of the above-captioned matter upon the records of the Court and mark the cost paid.

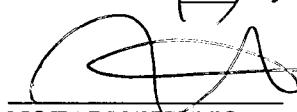
WELTMAN, WEINBERG & REIS CO., L.P.A.

By

  
Benjamin R. Bibler, Esquire  
Attorney for Plaintiff

Sworn to and subscribed

Before me the 13 day of January, 2011

  
NOTARY PUBLIC

