

07-1617-CD

Citibank vs Shelly K. Reed

Burton Neil & Associates, P.C.
By: Neil Sarker, Esquire ID. NO. 203465
1060 Andrew Drive, Suite 170
West Chester, PA 19380
(610) 696-2120
Attorney for Plaintiff

CITIBANK (SOUTH DAKOTA), N.A.
701 East 60th Street N, Sioux Falls, SD 57117

Plaintiff

: IN THE COURT OF COMMON PLEAS

: CLEARFIELD COUNTY, PENNSYLVANIA

v.

SHELLY K REED
189 Sawmill Lane, Wallaceton PA 16876-0036

Defendant

: NO. 07-1617-CD
: CIVIL ACTION - LAW

Complaint - 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 (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claim 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. 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.

LAWYER REFERENCE AND INFORMATION SERVICE

David S. Meholick
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
Telephone No. 814-765-2641 Ext. 5982

C-12647

FILED
m/13:4764
OCT 03 2007
Atty pd. 85.00
lcc Sheriff
William A. Shaw
Prothonotary/Clerk of Courts



Burton Neil & Associates, P.C.
By: Neil Sarker, Esquire ID. NO. 203465
1060 Andrew Drive, Suite 170
West Chester, PA 19380
(610) 696-2120
Attorney for Plaintiff

CITIBANK (SOUTH DAKOTA), N.A. : IN THE COURT OF COMMON PLEAS
701 East 60th Street N, Sioux Falls, SD 57117
Plaintiff : CLEARFIELD COUNTY, PENNSYLVANIA

v.

: NO.

SHELLY K REED
189 Sawmill Lane, Wallaceton PA 16876-0036
Defendant : CIVIL ACTION - LAW

Complaint

1. Plaintiff is CITIBANK (SOUTH DAKOTA), N.A., with place of business located at 701 East 60th Street North, Sioux Falls, South Dakota.
2. Defendant is Shelly K Reed, who resides at 189 Sawmill Lane, Wallaceton, Clearfield County, Pennsylvania.
3. Plaintiff is a national banking association, engaged in various types of banking business including consumer lending through the issuance of credit cards.
4. Plaintiff furnished consumer credit to the defendant by means of a credit card with account number 5424180548007050 hereinafter referred to as the credit card account.
5. Plaintiff kept accurate running records of all debits and credits to the account.
6. Plaintiff mailed to defendant monthly statements for the account including the billing statement attached hereto as Exhibit A. The monthly statements accurately stated the previous balance, the debits and credits to the account for the prior billing period.
7. Before plaintiff mailed Exhibit A, defendant had for many months made payments on account of the billing statement or retained the statement without payment.

8. Defendant's actions as set forth above constituted an account stated between parties for the sum of \$6,754.29 which sum reflects the Exhibit A statement balance less credits, if any, which were applied subsequent to the date of Exhibit A.

Wherefore, plaintiff demands judgment against defendant for the sum of \$6,754.29, and the costs of this action.

Burton Neil & Associates, P.C.

By: 

Neil Sarker, Esquire
Attorney for Plaintiff

The law firm of Burton Neil & Associates, P.C. is a debt collector.

07/20/07 \$6754.29 \$6754.29

SITE:KC-CL TM:CO-5000 ACID:KCB3104
08/28/07 23:58:45:

PMT DUE DATE NEW BALANCE MIN AUT DER

SHELLY K REED
PO BOX 36
WALLACETON
16876-0036000

PA

CITI CARDS
PO BOX 183067
COLUMBUS, OH
43218-3067

C-12647

Citi® Premier Card

Account Number
5424 1805 4800 7050

Customer Service:

1-800-866-9900

BOX 6500

SIOUX FALLS, SD

57117

Total Credit Line	Available Credit Line	Cash Advance Limit	Available Cash Limit	New Balance
\$6260	\$0	\$3800	\$0	\$6754.29
Statement/ Closing Date	Amount Over Credit Line	Past Due	Purch/Adv Minimum Due	Minimum Amount Due
06/26/2007	\$494.29	\$1048.05	\$291.99	\$6754.29

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
	6/26		Standard Purch	
			LATE FEE - MAY PAYMENT PAST DUE	39.00
	6/26		66 0000	0000000000
			OVER CREDIT LIMIT FEE	39.00
	6/26		62 0000	0000000000
			PURCHASES*FINANCE CHARGE*PERIODIC RATE	5.81
	6/26		84 0000	0000000000
			Purch/Adv Thru 12/27/2004	
			PURCHASES*FINANCE CHARGE*PERIODIC RATE	180.18
	6/26		84 0000	0000000000

Your late fee was based on your account balance as of the payment due date (06/19/07), which was \$6,490.30.

Help is available! Please call the toll-free number shown above to learn about our special payment options. Call Monday - Friday, 7 am to 9 pm, or Saturday, 8 am to 5 pm, Central Time. Please give us the opportunity to assist you.

EXHIBIT

A

Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(=) New Balance
PURCHASES	\$6,490.30	\$78.00	\$0.00	\$185.99	\$6,754.29
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$6,490.30	\$78.00	\$0.00	\$185.99	\$6,754.29

Days This Billing Period: 32

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$205.47	0.08833%(D)	32.240%	32.240%
Purch/Adv thru 12/27/2004	\$6,374.48	0.08833%(D)	32.240%	32.240%
ADVANCES				
Standard Adv	\$0.00	0.08833%(D)	32.240%	32.240%

Verification

I, Shauna Houghton am an employee of Citicorp Credit Services, Inc., (USA) which is by contract the service provider for plaintiff CITIBANK (SOUTH DAKOTA), N.A. retained to perform services on its behalf. I am authorized to make this verification as attorney-in-fact for plaintiff under powers of attorney from plaintiff to Citicorp Credit Services, Inc. (USA) and to me. The foregoing averments of fact in the within pleading are true and correct to the best of my knowledge, information and belief. I understand that the statements made herein are subject to the penalties of 13 Pa. C.S. Section 4904, relating to unsworn falsification to the authorities.

✓ Shauna Houghton
Signature Shauna Houghton

Shelly K Reed
5424180548007050

FILED

OCT 03 2007

William A. Shaw
Prothonotary/Clerk of Courts

Shirley Houston

Shirley Houston

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CITIBANK (SOUTH DAKOTA), N.A.
701 East 60th Street N
Sioux Falls, SD 57117

Plaintiff(s)

v.

SHELLY K REED
PO Box 36 / 189 Sawmill Lane
Wallaceton PA 16876-0036

Defendant(s)

CIVIL DIVISION, ARBITRATION
AND STATUTORY APPEALS ONLY

CASE NO. 07-1617-CD

TYPE OF PLEADING: _____

Praecipe for Default Judgment

CODE AND CLASSIFICATION:

FILED ON BEHALF OF: Plaintiff

CITIBANK (SOUTH DAKOTA), N.A.

(Name of Party, indicate plaintiff or defendant)

NAME, ADDRESS AND TELEPHONE OF:

 X Counsel of Record
 Individual, if pro se


Neil Sarker, Esquire
Burton Neil & Associates, P.C.
1060 Andrew Drive, Suite 170
West Chester, PA 19380
Telephone: 610-696-2120
email: litigation@burt-law.com

Attorney's State ID# 203465

Attorney's Firm ID# _____

(Signature)

FILED *pd \$20.00 Atty*
m/11:37am notice to deft
APR 11 2008 *Statement to Atty*


William A. Shaw
Prothonotary/Clerk of Courts

CITIBANK (SOUTH DAKOTA), N.A.
701 East 60th Street N, Sioux Falls, SD 57117
Plaintiff

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

v.

: NO. 07-1617-CD

SHELLY K REED
PO Box 36 / 189 Sawmill Lane
Wallaceton PA 16876-0036
Defendant

: CIVIL ACTION - LAW

Praecept for Default Judgment

To the Prothonotary:

Please enter judgment by default for want of an answer in the above case in favor of the plaintiff and against the defendant, and assess damages as follows:

Principal:	\$6,754.29
Credits:	\$3,253.32
TOTAL	\$3,500.97

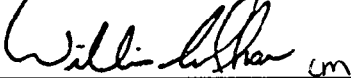
Understanding that false statements herein made are subject to penalty under 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities, I verify that:

1. The above are the precise last-known addresses of the judgment debtor and creditor.

2. The annexed notice of intention to file this praecipe was mailed to all parties against whom judgment is to be entered and to their record attorneys, if any, after the default occurred, and at least ten days prior to the date of the filing of this praecipe.

3. Pursuant to Section 201(b)(1)(A) of the Servicemembers Civil Relief Act of 2003 (SCRA), the defendant is not in the military service of the United States based on information received from the defendant and/or the Department of Defense website.

**JUDGMENT BY DEFAULT ENTERED
AND DAMAGES ASSESSED AS ABOVE.
NOTICE GIVEN UNDER PA.R.CIV.P. 236**



Pro Prothonotary

Burton Neil & Associates, P.C.

By: 

Neil Sarker, Esquire
Attorney for Plaintiff

I.D. NO. 203465

1060 Andrew Drive, Suite 170
West Chester, PA 19380

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C-12647



CITIBANK (SOUTH DAKOTA), N.A.

: IN THE COURT OF COMMON PLEAS

Plaintiff

: CLEARFIELD COUNTY, PENNSYLVANIA

v.

: NO. 07-1617-CD

SHELLY K REED

Defendant

: CIVIL ACTION - LAW

Notice of Intention to File Praecipe for Default Judgment

TO: Shelly K Reed
PO Box 36 / 189 Sawmill Lane
Wallaceton PA 16876-0036

IMPORTANT NOTICE

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 (10) 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 notice to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the following office to find out where you can get legal 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.

**LAWYER REFERENCE AND
INFORMATION SERVICE**

David S. Meholick0.
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
Telephone No. 814-765-2641 Ext. 5982

DATE OF NOTICE: December 11, 2007

Burton Neil & Associates, P.C.

By: 

Neil Sarker, Esquire
Attorney for Plaintiff
Identification No. 203465
1060 Andrew Drive, Suite 170
West Chester, PA 19380
(610) 696-2120

In making this communication, we advise our office is a
debt collector.



Burton Neil & Associates, P.C.
By: Neil Sarker, Esquire ID. NO. 203465
1060 Andrew Drive, Suite 170
West Chester, PA 19380
610-696-2120

Attorney for Plaintiff

CITIBANK (SOUTH DAKOTA), N.A.

Plaintiff

v.

SHELLY K REED

Defendant

: IN THE COURT OF COMMON PLEAS

: CLEARFIELD COUNTY, PENNSYLVANIA

: NO. 07-1617-CD

: CIVIL ACTION - LAW

Rule of Civil Procedure NO. 236 (Revised)

Notice is given that a JUDGMENT in the above captioned matter has been entered
against you on April 11, 2008.

Prothonotary

By: Willi L. Sarker cm

Deputy

If you have any questions concerning the above, please contact:

Neil Sarker, Esquire
Attorney for Party Filing
1060 Andrew Drive, Suite 170
West Chester, PA 19380
Phone: 610-696-2120

The law firm of Burton Neil & Associates is a debt collector.

COPY

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

COPY

Citibank (South Dakota), N.A.
Plaintiff(s)

No.: 2007-01617-CD

Real Debt: \$3500.97

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Shelly K. Reed
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: April 11, 2008

Expires: April 11, 2013

Certified from the record this April 11, 2008



LM

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

FILED

0 9:42 AM, CL NO CC, 1 cent. of
MAY 27 2009

William A. Shaw
Prothonotary/Clerk of Courts

Sub. to Atty

(611)

Burton Neil & Associates, P.C.
By: Neil Sarker, Esquire ID. NO. 203465
1060 Andrew Drive, Suite 170
West Chester, PA 19380
610-696-2120

Attorney for Plaintiff

CITIBANK (SOUTH DAKOTA), N.A.

Plaintiff

v.

SHELLY K REED

Defendant

: IN THE COURT OF COMMON PLEAS

: CLEARFIELD COUNTY, PENNSYLVANIA

: NO. 07-1617-CD

: CIVIL ACTION - LAW

Praecipe to Satisfy Judgment

To the Prothonotary:

Mark the judgment **Satisfied** on payment of your costs only.

Burton Neil & Associates, P.C.

By: _____

Neil Sarker, Esquire
Attorney for Plaintiff

The law firm of Burton Neil & Associates is a debt collector.

C-12647

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

CIVIL DIVISION

CERTIFICATE OF SATISFACTION OF JUDGMENT

Citibank (South Dakota), N.A.

No.: 2007-01617-CD

Vs.

Debt: \$3,500.97

Shelly K. Reed

Atty's Comm.:

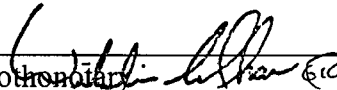
Interest From:

Cost: \$7.00

NOW, Thursday, May 28, 2009 , directions for satisfaction having been received, and all costs having been paid, SATISFACTION was entered of record.

Certified from the record this 28th day of May, A.D. 2009.

Prothonotary



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103267
NO: 07-1617-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: CITIBANK (SOUTH DAKOTA) N.A.
vs.
DEFENDANT: SHELLY K.. REED

SHERIFF RETURN

NOW, October 12, 2007 AT 11:28 AM SERVED THE WITHIN COMPLAINT ON SHELLY K. REED DEFENDANT AT 189 SAWMILL LANE, WALLACETON, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO SHELLY K. REED, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: HUNTER / DEHAVEN

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	NEIL	34464	10.00
SHERIFF HAWKINS	NEIL	34464	27.70

FILED

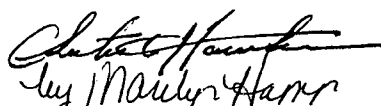
9/2:00 PM
FEB 04 2008

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

_____ Day of _____ 2008
-2007-

So Answers,


Chester A. Hawkins
Sheriff