

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

DISCOVER BANK

Plaintiff

vs.

TAMARA SUE KIEHLMEIER

Defendant

No: 07-1645-CD

COMPLAINT IN CIVIL ACTION

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
06191556 C A Pit WLG

FILED

OCT 10 2007

William A. Shaw
Prothonotary/Clerk of Courts

100 Sheriff
Atty pd-85.00

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

DISCOVER BANK

Plaintiff
vs.

Civil Action No

TAMARA SUE KIEHLMEIER

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 Rd, New Albany, OH 43054.

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

TAMARA SUE KIEHLMEIER
572 NO 2 SHAFT RD
DU BOIS, PA 15801

3. Defendant applied for and received a credit card issued by Plaintiff bearing the account number 6011002760655134 . 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 September 26, 2007 , in the amount of \$1762.07 .


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 , TAMARA SUE KIEHLMEIER , INDIVIDUALLY , in the amount of \$1762.07 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
06191556 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.

CARD

31,762.07

\$390.00

Account number ending in 5134
Enter Amount Enclosed BelowPayment Due Date
August 14, 2007

\$

15 SDSN6A01 0006236

TAMARA KIEHLMEIER
572 #2 SHAFT RD
DU BOIS PA 15801Make a payment now or schedule
one in advance. It's fast, easy,
secure - and free! Visit us today at
Discovercard.com/payments

6191556

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.

PO BOX 15251

WILMINGTON DE 19886-5251

000006011002760655134017620700035000039000

Discover More Card Account Summary

Account number ending in 5134
Payment Due Date August 14, 2007
Minimum Payment Due \$390.00
Credit Limit \$1,500.00
Credit Available \$0.00
Cash Credit Limit \$800.00
Cash Credit Available \$0.00

Closing Date: July 15, 2007

page 1 of 1

Previous Balance	\$1,733.07
Payments And Credits	-
Purchases	0.00
Cash Advances	+ 29.00
Balance Transfers	+ 0.00
Finance Charges	+ 0.00
New Balance	= \$1,762.07

Cashback Bonus®

Cashback Bonus® Anniversary
Date: February 15

Opening Cashback Bonus Balance	\$ 0.00
New Cashback Bonus Earned	+ 0.00
Cashback Bonus Balance Available to Redeem	\$ 0.00

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 More 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		
Payments and Credits	Jun 19	Jun 19	PAYMENT - THANK YOU	
	Jun 27	Jun 19	PAYMENT ADJUSTMENT	\$ -35.00
Other/Miscellaneous	Jun 27	Jun 27	RETURNED CHECK CHARGE	35.00
				29.00

EXHIBIT

EXHIBIT

Finance Charge Summary

	Average Daily Balances	Daily Periodic Rates	Nominal ANNUAL PERCENTAGE RATES	ANNUAL PERCENTAGE RATES	Periodic FINANCE CHARGES	Transaction Fee FINANCE CHARGES
current billing period: 30 days						
Purchases	\$0	0.06299%	22.99% F	22.99%	\$0	none
Cash Advances	\$0	0.06299%	22.99% F	22.99%	\$0	\$0
previous billing period: 31 days						
Purchases	\$0	0.06299%	22.99% F	22.99%	\$0	none

The rates that apply to your Account are either fixed (F) or they may vary (V) as noted above.

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 Yvette Benner,
(Name)

Accounts Manager of DFS Services, LLC, plaintiff herein, that
(Title) (Company)

he/she 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.

Yvette Benner
(Signature)

WWR # 6191556
TAMARA SUE KIEHLMEIER
6011002760655134

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

DISCOVER BANK

Plaintiff

vs.

TAMARA SUE KIEHLMEIER

Defendant

No.07-1645-CD

**PRAECIPE FOR ENTRY OF
JUDGMENT BY CONSENT**

FILED ON BEHALF OF
Plaintiff

COUNSEL OF RECORD OF
THIS PARTY:

Patrick Thomas Woodman, Esquire
PA I.D. #34507
WELTMAN, WEINBERG & REIS CO., L.P.A.
2718 Koppers Building
436 Seventh Avenue
Pittsburgh, PA 15219
(412) 434-7955

WWR#06191556
\$2062.07

FILED *Atty pd. 20.00*
mtl:3/2/07
DEC 10 2007 *icc & Notice to Def.*
Statement to Atty
William A. Shaw
Prothonotary/Clerk of Courts *(GK)*

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

DISCOVER BANK

Plaintiff

vs.

Civil Action No. 07-1645-CD

TAMARA SUE KIEHLMEIER

Defendant

PRAECIPE FOR JUDGMENT BY CONSENT

TO THE PROTHONOTARY:

Kindly enter Judgment against Defendant, TAMARA SUE KIEHLMEIER, in the amount of \$2062.07 plus costs, based upon the consent of the parties.

CONSENTED TO:

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

TAMARA SUE KIEHLMEIER,

By: Patrick Thomas Woodman
Attorney for Plaintiff

By: Tamara Sue Kiehlmeier
Defendant

WWR#06191556

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

DISCOVER BANK

Plaintiff

vs.

Civil Action No. 07-1645-CD

TAMARA SUE KIEHLMEIER

Defendant

**STIPULATION OF THE PARTIES FOR PAYMENT
AND FOR THE ENTRY OF JUDGMENT BY CONSENT**

TO THE PROTHONOTARY:

Kindly enter Judgment in favor of Plaintiff and against the Defendant, TAMARA SUE KIEHLMEIER, above-named, in the amount of \$2062.07 pursuant to the Stipulation of the Parties for Payment and for the Entry of Judgment by Consent, as follows:

1. Defendant admits indebtedness to Plaintiff in the amount of \$1762.07 with continuing interest thereon at a rate of 6.00% per annum from OCTOBER 23, 2007, plus attorneys' fees in the amount of \$300.00 and costs.
2. To secure the repayment of said indebtedness, Defendant agrees that Judgment by Consent will be entered in favor of the Plaintiff and against the Defendant, TAMARA SUE KIEHLMEIER, in the amount of \$1762.07 plus continuing interest thereon at the rate of 6.00% per annum from OCTOBER 23, 2007, plus attorneys' fees in the amount of \$300.00 and costs.
3. Plaintiff agrees not to Execute on its Judgment so long as Defendant causes to be delivered to Plaintiff the following payments in full by 12:00 NOON on the following dates:
 - (a) \$100.00 due by 11/25/07;
 - (b) no less than \$100.00 per month due on the 25TH day of each consecutive month thereafter until the Judgment amount plus accrued interest and costs are paid in full.

4. All payments are to be made payable to the order of "DISCOVER BANK"

5. The first payment due under this agreement is to be received at the offices of Weltman, Weinberg & Reis, Co., L.P.A., 436 Seventh Avenue, Suite 2718, Pittsburgh, PA 15219. All future payments are to be mailed to the offices of Weltman, Weinberg & Reis, Co., P.O. Box 5430, Cleveland, OH 44101-0430.

6. In the event of default, each payment received shall be first attributed to costs, interest and then to principal.

7. Time is of the essence of this agreement and should the Defendant fail to have in the hands of Plaintiff or Plaintiff's counsel any payment in full within five (5) calendar days of the stated due date, then Plaintiff shall be immediately free to issue Execution as well as pursue all other remedies, in law or in equity, to collect the full balance of the Judgment entered hereunder plus appropriate additional interest and costs.

8. No act or omission of the Plaintiff, nor of anyone alleged to be acting on its behalf, shall constitute a waiver, estoppel, or any other excuse for non-performance of any duty undertaken by the Defendant in this Stipulation which the parties agree is final and complete.

9. Intending to be legally bound, the parties set their hands and seals this 26 day of NOV,
2007.

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

By: Patrick Thomas Woodman
Patrick Thomas Woodman, Esquire
PA I.D. #34507
WELTMAN, WEINBERG & REIS CO., L.P.A.
2718 Koppers Building
436 Seventh Avenue
Pittsburgh, PA 15219
(412) 434-7955

WWR#06191556

By: Tamara Sue Kiehlmeier
Defendant, TAMARA SUE KIEHLMEIER

COPY

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

DISCOVER BANK

Plaintiff

vs.

Civil Action No. 07-1645-CD

TAMARA SUE KIEHLMEIER

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 12/10/07

(xx) Assumpsit Judgment in the amount
 of \$2062.07 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
 ☐ Default
 ☐ Verdict
 ☐ Arbitration
 ☐ Award
 (XX) By Consent

Prothonotary

TAMARA SUE KIEHLMEIER
572 NO 2 SHAFT RD
DU BOIS, PA 15801

By: Will [Signature]
PROTHONOTARY (OR DEPUTY)

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

COPY

Discover Bank
Plaintiff(s)

No.: 2007-01645-CD

Real Debt: \$2,062.07

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Tamara Sue Kiehlmeier
Defendant(s)


Entry: \$20.00

Instrument: Consent Judgment

Date of Entry: December 10, 2007

Expires: December 10, 2012

Certified from the record this 10th day of December, 2007.



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

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103286
NO: 07-1645-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: DISCOVER BANK
vs.
DEFENDANT: TAMARA SUE KIEHLMEIER

SHERIFF RETURN

NOW, October 18, 2007 AT 11:30 AM SERVED THE WITHIN COMPLAINT ON TAMARA SUE KIEHLMEIER DEFENDANT AT 572 NO 2 SHAFT RD, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO TAMARA SUE KIEHLMEIER, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: NEVLING / COUDRIET

FILED

013:20cm
FEB 06 2008

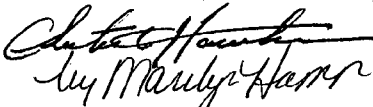
William A. Shaw
Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	WELTMAN	8503182	10.00
SHERIFF HAWKINS	WELTMAN	8503182	36.43

Sworn to Before Me This

_____ Day of _____ 2008
2007

So Answers,


Chester A. Hawking
Sheriff

FILED *ICC + 1 Cert of*
m/12:00pm set issued to
FEB - 5 2010 *Atty Warmbrodt*
William A. Shaw
Prothonotary/Clerk of Courts

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

DISCOVER BANK

Plaintiff

vs.

TAMARA SUE KIEHLMEIER

Defendant(s)

No. 07-1645-CD

PRAECIPE FOR SATISFACTION OF
JUDGMENT

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.
1400 Koppers Building
436 Seventh Avenue
Pittsburgh, PA 15219
(412) 434-7999

WWR#6191556 DIS

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

DISCOVER BANK

Plaintiff

vs.

Civil Action No. 07-1645-CD

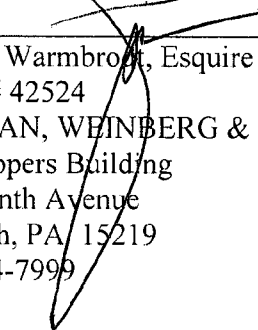
TAMARA SUE KIEHLMEIER

Defendant(s)

PRAECIPE FOR SATISFACTION OF JUDGMENT

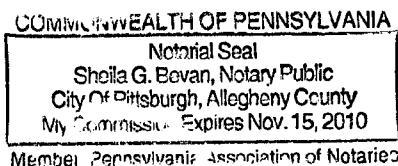
At the request of the undersigned attorneys for the Plaintiff, you are directed to satisfy the above-captioned Judgment.

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

By: 
James C. Warmbrodt, Esquire
PA I.D. # 42524
WELTMAN, WEINBERG & REIS CO., L.P.A.
1400 Koppers Building
436 Seventh Avenue
Pittsburgh, PA 15219
(412) 434-7999
WWR #6191556

Sworn to and subscribed
before me this 13
day of January, 10


NOTARY PUBLIC



IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

7/10/10

CERTIFICATE OF SATISFACTION OF JUDGMENT

Discover Bank

No.: 2007-01645-CD

Vs.

Debt: \$2062.07

Tamara Sue Kiehlmeier

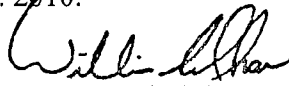
Atty's Comm.:

Interest From:

Cost: \$7.00

NOW, Friday, February 05, 2010 , directions for satisfaction having been received, and all costs having been paid, SATISFACTION was entered of record.

Certified from the record this 5th day of February, A.D. 2010.


Prothonotary