



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TARGET NATIONAL BANK/TARGET VISA

Plaintiff

v.

STEPHEN C IZYK

Defendant(s)

NO. 07-1949-CD

**COMPLAINT IN CIVIL  
ACTION**

Filed on behalf of:  
TARGET NATIONAL  
BANK/TARGET VISA

Counsel of Record for This Party:

Gregg L. Morris, Esquire  
Pa I.D. #69006

Patenaude & Felix, A.P.C.  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675

**FILED** *Atty pd.*  
*7/12:46/ST*  
NOV 30 2007 *85.00*  
*ICC Sheriff*  
William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TARGET NATIONAL BANK/TARGET VISA

Plaintiff

v.

STEPHEN C IZYK

Defendant(s)

NO.

**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.

Usted ha sido demandado en corte. Si usted desea defenderse de las demandas que se presentan mas adelante en las siguientes paginas, debe tomar accion dentro de los proximos veinte (20) dias despues de la notificacion de esta Demanda y Aviso radicando personalmente o por medio de un abogado una comparecencia escrita y radicando en la Corte por escrito sus defensas de, y objeciones a, las demandas presentadas aqui en contra suya. Se le advierte de que si usted fall de tomar accion como se describe anteriormente, el caso pude proceder sin usted y un fallo por cualquier suma de dinero reclamada en la demanda o cualquier reclamacion o remedio solicitado por el demandante puede ser dictado en contra suya por la Corte sin mas aviso adicional. Usted puede perder dinero o propiedad au otros derechos importantes para usted.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER

USTED DEBE LLEVAR ESTE DOCUMENTO A SU ABOGADO INMEDIATAMENTE. SI USTED NO TIENE UN ABOGADO, LLAME O VAYA A LA SIGUENTE OFICINA. ESTA OFICINA PUEDE PROVEERLE INFORMACION A CERCA DE COMO CONSEGUIR UN ABOGADO

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.

SI USTED NO PUEDE PAGAR POR LOS SERVICIOS DE UN ABOGADO, ES POSSIBLE QUE ESTA OFICINA LE PUEDA PROVEER INFORMACION SOBRE AGENCIAS QUE OFREZCAN SERVICIOS LEGALES SIN CARGO O BAJO COSO A PERSONAS QUE CALIFICAN.

CLEARFIELD COUNTY COURTHOUSE  
DAVID S. MEHOLICK, COURT  
ADMINISTRATOR  
230 EAST MARKET STREET  
CLEARFIELD, PA 16830  
814-765-2641

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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TARGET NATIONAL BANK/TARGET VISA	)	
	)	
Plaintiff	)	NO.
	)	
	)	
v.	)	
	)	
STEPHEN C IZYK	)	
	)	
Defendant(s)	)	
	)	

**COMPLAINT IN CIVIL ACTION**

AND NOW, comes Plaintiff, TARGET NATIONAL BANK/TARGET VISA , by and through its attorney, GREGG MORRIS, ESQUIRE and the law offices of PATENAUDE & FELIX, A.P.C. and files the following **Complaint in Civil Action**, and in support thereof aver as follows:

1. Plaintiff, TARGET NATIONAL BANK/TARGET VISA , is a corporation and for the purpose of this litigation, maintaining a place of business c/o PATENAUDE AND FELIX, A.P.C., 213 East Main St Carnegie, Pennsylvania 15106.
2. Defendant is STEPHEN C IZYK, an adult individual, believed to currently reside at 824 W WASHINGTON AVE DU BOIS, PA 15801-1622.
3. Heretofore, the Defendant(s) opened a account with Plaintiff being Account No. 4352376715151791, for the purchase of good and services.
4. The Defendant(s) has/have made or authorized a number of purchases and as of September 25, 2007, Defendant(s) owes \$4,871.94 on said account plus interest at 0.00 %.
5. Plaintiff maintains accurate books of account recording all credits and debits for

this account.

6. The Defendant(s) have/has received monthly billing statements from Plaintiff setting forth the nature and amount of all charges made by Defendant(s), and the transactions between Plaintiff and Defendant(s) give rise to an account stated, upon which Plaintiff has relied.

7. The Defendant(s) made payments, but have/has refused to pay, and now refuses to pay the balance due and owing on the aforesaid account in the sum of \$4,871.94, plus interest and costs.

8. By failing to object or dispute the statements, Defendant(s) have/has assented to and agreed to the correctness of the balance due on the credit card account so as to constitute and account stated.

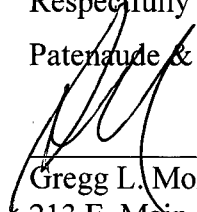
9. Despite repeated demands, Defendant(s) have/has failed to make the required installment payments when due and therefore the full amount of the account is now due and payable.

**WHEREFORE**, Plaintiff demands Judgment in its favor, and against Defendant(s), in the amount of \$4,871.94, plus legal interest from the date of breach, with continuing interest at the legal rate thereon from the date of Judgment plus costs. The damages requested are less than the maximum amount for compulsory arbitration as set by the Court.

Respectfully submitted:

Patenaude & Felix, A.P.C.

Date: \_\_\_\_\_



\_\_\_\_\_  
Gregg L. Morris, Esquire  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675



\*00000\*

Account Number: 4352-3767-1515-1791  
STEPHEN C IZYK

Statement Closing Date: September 25, 2007  
Page 1 of 2

### Target Visa Credit Card Account Summary

Total Credit Limit \$0  
Cash Limit \$0  
Available Credit \$0  
Portion Available for Cash \$0  
The Cash Limit is a portion of the Total Credit Limit

Previous Balance \$4,836.94  
Payments & Credits 0.00  
Purchases & Advances 0.00  
Other Charges 35.00  
**FINANCE CHARGES 0.00**  
**New Balance \$4,871.94**  
**Amount Past Due \$1,179.75**  
**Minimum Payment Due \$4,871.94**  
**(includes any Amount Past Due)**  
**Payment Due Date October 20, 2007**

### Questions? Call Us:

Target Credit Services 1-888-755-5856  
TDD/TDY 1-800-347-5842  
Outside the U.S. 11-612-307-8622 (Call Collect)

Calling will not preserve your billing-error rights

### Payments & Credits

No payments or credits were received last month.

### Other Charges

Sep. 19 LATE PAYMENT FEE \$35.00  
Total Other Charges \$35.00

Target National Bank, an affiliate of Target Stores

NOTICE: SEE REVERSE SIDE FOR IMPORTANT INFORMATION

INCLUDE THIS PORTION WITH YOUR PAYMENT MADE PAYABLE TO TARGET NATIONAL BANK



Account Number 4352-3767-1515-1791  
New Balance \$4,871.94  
Minimum Payment Due \$4,871.94  
Payment Due Date October 20, 2007

NEW PHONE, HOME OR  
E-MAIL ADDRESS?  
PLEASE UPDATE ON  
REVERSE SIDE.



TARGET NATIONAL BANK  
P.O. BOX 59317  
MINNEAPOLIS, MN 55459-0317

Amount  
Enclosed

\$

### OFFICE COPY

STATEMENT PAGE NOT PRINTED

STEPHEN C IZYK  
824 W WASHINGTON AVE  
DU BOIS, PA 15801-1622



3001600487194048719490435237671515179171



\*00000\*

**Account Number: 4352-3767-1515-1791**  
STEPHEN C IZYK

Statement Closing Date: **September 25, 2007**  
Page 2 of 2

### Finance Charges

Days in Billing Period: 31

Balance Type	Daily Periodic Rate	Corresponding Annual Percentage Rate	Average Daily Balance	Periodic FINANCE CHARGE	Transaction FINANCE CHARGE
Purchases	0.07736%	28.24%	\$0.00	\$0.00	\$0.00
Cash	0.07736%	28.24%	\$0.00	\$0.00	\$0.00

Total **FINANCE CHARGES:** **\$0.00**

Actual **ANNUAL PERCENTAGE RATE:** **0.00%**

There is a minimum **FINANCE CHARGE** of **\$1.00** for any billing period in which a Finance Charge is imposed.



In \_\_\_\_\_ Court

\_\_\_\_\_ Judicial (Circuit/District)

Original Creditor Name: TARGET NATIONAL BANK

Debtor Name: IZYK, STEPHEN C

Co-Debtor Name:

Account Number: 4352376715151791

AFFIDAVIT OF ACCOUNT

STATE OF MINNESOTA

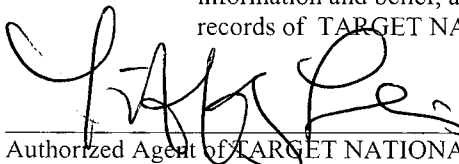
COUNTY OF HENNEPIN

ss:

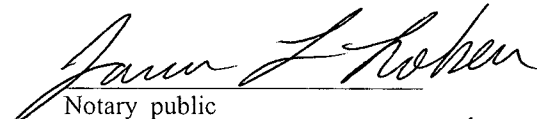
The undersigned, TIFFANY LEWIS states that:

1. I am a representative of TARGET NATIONAL BANK and am authorized to Verify current balances due and owing to TARGET NATIONAL BANK on credit card accounts.
2. As of the date of this affidavit I have reviewed the records of the above listed person and account, and that the amount due and owing to TARGET NATIONAL BANK on this account, over and above all known legal set offs is \$4871.94.
3. That reasonable inquiry has been made to determine if the defendant is in the military service of the United States of America, and to the best of my knowledge that defendant is not in such military service and is therefore not entitled to the rights and privileges provided under the Soldiers and Sailors Civil Relief Act of 1940, as amended.

That the above information is true to the best of my knowledge, information and belief, and based upon the books and business records of TARGET NATIONAL BANK.

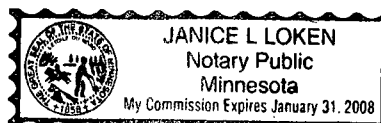
  
Authorized Agent of TARGET NATIONAL BANK

Subscribed and sworn to before  
Me on 20th day of November, 2007


  
Notary public

My commission expires: 1/31/08

4352376715151791  
A144 PATENAUDE & FELIX, A.P.C



The undersigned does hereby verify subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities, that she is, Tiffany Lewis, Assistant Secretary, of Target National Bank, Plaintiff Herein, that she is duly authorized to make this Declaration, and hat the facts set forth in the foregoing Complaint in Civil Action are true and correct to the best of her knowledge, information and belief.

A handwritten signature in black ink, appearing to read 'T. Lewis', is written over a horizontal line.

Tiffany Lewis  
Authorized Agent of Target National Bank/Target Visa

4352376715151791  
A144  
PATENAUDE & FELIX, A.P.C

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103487  
NO: 07-1949-CD  
SERVICE # 1 OF 1  
COMPLAINT

PLAINTIFF: TARGET NATIONAL BANK/TARGET VISA  
vs.  
DEFENDANT: STEPHEN C. IZYK

SHERIFF RETURN

NOW, December 11, 2007 AT 12:05 PM SERVED THE WITHIN COMPLAINT ON STEPHEN C. IZYK DEFENDANT AT 824 W WASHINGTON AVE., DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO STEPHEN IZYK, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: COUDRIET /

FILED  
01/31/22/08  
APR 11 2008  
William A. Shaw  
Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	PATENAUDE	17295	10.00
SHERIFF HAWKINS	PATENAUDE	17295	73.29

Sworn to Before Me This

\_\_\_\_\_ Day of \_\_\_\_\_ 2008  
2007

So Answers,

  
by Marilyn Hamer  
Chester A. Hawkins  
Sheriff

FILED No CC.

m/3:13cm

APR 29 2010

William A. Shaw

Prothonotary/Clerk of Courts

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TARGET NATIONAL BANK

Plaintiff

v.

STEPHEN C IZYK

Defendant(s)

NO. 07-1949-CD

**PRAECIPE TO  
DISCONTINUE WITHOUT  
PREJUDICE**

Filed on behalf of:  
TARGET NATIONAL BANK

Counsel of Record for This Party:

Gregg L. Morris, Esquire  
Pa I.D. #69006

Patenaude & Felix, A.P.C.  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675

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TARGET NATIONAL BANK

Plaintiff

v.

STEPHEN C IZYK

Defendant(s)

NO. 07-1949-CD

**PRAECIPE TO DISCONTINUE WITHOUT PREJUDICE**

TO: Prothonotary

Please discontinue the matter captioned above without prejudice upon payment of costs only. Thank you.

Respectfully submitted:

Patenaude & Felix, A.P.C.

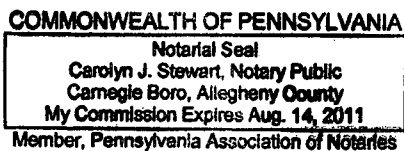
Date: April 27, 2010

Gregg L. Morris, Esquire  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675

Sworn to and subscribed before me this

27 day of April, 2010.

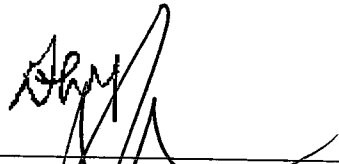
Carolyn J. Stewart  
Notary Public



I, GREGG MORRIS, attorney for Plaintiff, TARGET NATIONAL BANK , hereby  
certify that a true and correct copy of foregoing document was served this date by ordinary mail  
upon the following:

Stephen C Izyk  
824 W Washington Ave  
Du Bois PA 15801-1622

Date: April 27, 2010



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Gregg L. Morris, Esquire  
Patehaude & Felix, A.P.C.  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675