

08-555-CD

Citibank vs Justin K. Bloom

Burton Neil & Associates, P.C.
By: Brit J. Suttell, Esquire ID. NO. 204140
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.

JUSTIN K BLOOM : NO. 08-555-CD
98 Norris Road, Curwensville PA 16833-6521
Defendant : 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-13718

FILED *Atty pd. 95.00*
3/1/08
MAR 27 2008
ICC Sheriff
William A. Shaw
Prothonotary/Clerk of Courts

Burton Neil & Associates, P.C.
By: Brit J. Suttell, Esquire ID. NO. 204140
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.

JUSTIN K BLOOM
98 Norris Road, Curwensville PA 16833-6521

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 Justin K Bloom, who resides at 98 Norris Road, Curwensville, 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 4128004021783304 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.

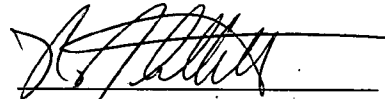
7. Before plaintiff mailed Exhibit A, defendant had for many months made payments on account of the billing statement or retained the statement without payment.

8. Defendant's actions as set forth above constituted an account stated between parties for the sum of \$1,142.93 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 \$1,142.93, and the costs of this action.

Burton Neil & Associates, P.C.

By:

A handwritten signature in black ink, appearing to read "Britt J. Suttell", written over a horizontal line.

Britt J. Suttell, Esquire
Attorney for Plaintiff

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

09/03/07 \$1875.93 \$1875.93 SITE:KC-CL TM:CO-5000 ACID:KCB3104
 PMT DUE DATE NEW BALANCE MIN AMT DUE 12/27/07 22:41:48:

JUSTIN K BLOOM
 98 NORRIS RD
 CURWENSVILLE
 16833-6521000

PA

CITI CARDS
 PO BOX 183058
 COLUMBUS, OH
 43218-3058

C-13718

Citi® Platinum Select® Card



Account Number
 4128 0040 2178 3304

Customer Service:

1-800-950-5114	Total Credit Line \$1200	Available Credit Line \$0	Cash Advance Limit \$300	Available Cash Limit \$0	New Balance \$1875.93
BOX 6500	Statement/ Closing Date 08/13/2007	Amount Over Credit Line \$675.93	Past Due \$305.42	Purch/Adv Minimum Due \$108.17	Minimum Amount Due \$1875.93
SIoux FALLS, SD					
57117					

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
	8/13		Standard Purch	
	8/13		LATE FEE - JUL PAYMENT PAST DUE	39.00
			66 0000	700000000000
			PURCHASES*FINANCE CHARGE*PERIODIC RATE	51.17
			84 0000	700000000000

Your late fee was based on your account balance as of the payment due date (08/01/07), which was \$1,785.76.

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.

Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(=) New Balance
PURCHASES	\$1,785.76	\$39.00	\$0.00	\$51.17	\$1,875.93
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$1,785.76	\$39.00	\$0.00	\$51.17	\$1,875.93

Days This Billing Period: 32

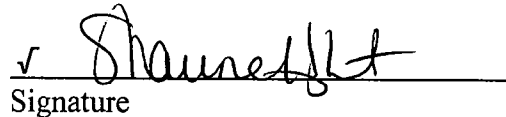
Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$1,810.43	0.08833%(D)	32.240%	32.240%
ADVANCES				
Standard Adv	\$0.00	0.08833%(D)	32.240%	32.240%

EXHIBIT

A

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 18 Pa. C.S. Section 4904, relating to unsworn falsification to the authorities.


Signature

Shauna Houghton

Justin K Bloom
4128004021783304

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103964
NO: 08-555-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: CITIBANK (SOUTH DAKOTA) N.A.
vs.
DEFENDANT: JUSTIN K. BLOOM

SHERIFF RETURN

NOW, April 02, 2008 AT 5:43 PM SERVED THE WITHIN COMPLAINT ON JUSTIN K. BLOOM DEFENDANT AT 98 NORRIS ROAD, CURWENSVILLE, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO TEAGUE BLOOM, BROTHER A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DAVIS / MORGILLO

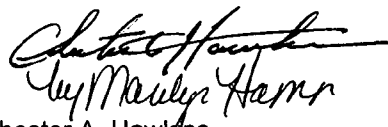
PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	NEIL	039367	10.00
SHERIFF HAWKINS	NEIL	039367	24.06

FILED
0/2:40cm
JUL 14 2008

Sworn to Before Me This

_____ Day of _____ 2008

So Answers, William A. Shaw
Prothonotary/Clerk of Courts


Chester A. Hawkins
Sheriff

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.

JUSTIN K BLOOM
98 Norris Road
Curwensville PA 16833-6521
Defendant(s)

CIVIL DIVISION, ARBITRATION
AND STATUTORY APPEALS ONLY

CASE NO. 08-555-CD

TYPE OF PLEADING:

Praeipce for Default Judgment

CODE AND CLASSIFICATION:

FILED ON BEHALF OF: Plaintiff
CITIBANK (SOUTH DAKOTA), N.A.
(Name of Party, indicate plaintiff or defendant)

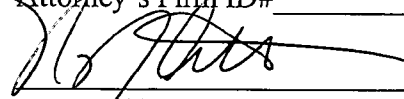
NAME, ADDRESS AND TELEPHONE OF:

X Counsel of Record
Individual, if pro se

Brit J. Suttell, 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# 204140

Attorney's Firm ID# _____


(Signature)

FILED *Any pd.*
7/11/08 *20.00*
AUG 05 2008 *Notice to Def.*
William A. Shaw *Statement to*
Prothonotary/Clerk of Courts *Att'y*
@

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 08-555-CD

JUSTIN K BLOOM
98 Norris Road
Curwensville PA 16833-6521
Defendant

: CIVIL ACTION - LAW

Praeipice for Default Judgment

To the Prothonotary:

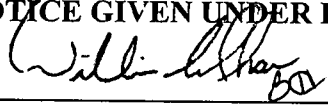
Please enter judgment by default for want of an answer in the above case in favor of the plaintiff and against the defendant, and assess damages as follows:

Principal:	\$1,142.93
TOTAL	\$1,142.93

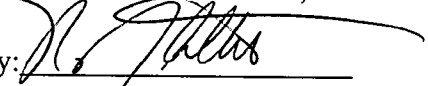
Understanding that false statements herein made are subject to penalty under 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities, I verify that:

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: 
Brit J. Suttell, Esquire
Attorney for Plaintiff
I.D. NO. 204140
1060 Andrew Drive, Suite 170
West Chester, PA 19380

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

C-13718

CITIBANK (SOUTH DAKOTA), N.A.

: IN THE COURT OF COMMON PLEAS

Plaintiff

: CLEARFIELD COUNTY, PENNSYLVANIA

v.

: NO. 08-555-CD

JUSTIN K BLOOM

Defendant

: CIVIL ACTION - LAW

Notice of Intention to File Praecipe for Default Judgment

TO: Justin K Bloom
98 Norris Road
Curwensville PA 16833-6521

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.

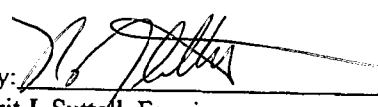
If you cannot afford to hire a lawyer, this office may be able to provide you with information about agencies that may offer legal services to eligible persons at a reduced fee or no fee.

**LAWYER REFERENCE AND
INFORMATION SERVICE**

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

DATE OF NOTICE: July 22, 2008

Burton Neil & Associates, P.C.

By: 
Brit J. Suttell, Esquire
Attorney for Plaintiff
Identification No. 204140
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: Brit J. Suttell, Esquire ID. NO. 204140
1060 Andrew Drive, Suite 170
West Chester, PA 19380
610-696-2120

Attorney for Plaintiff

CITIBANK (SOUTH DAKOTA), N.A.

Plaintiff

v.

JUSTIN K BLOOM

Defendant

: IN THE COURT OF COMMON PLEAS

: CLEARFIELD COUNTY, PENNSYLVANIA

: NO. 08-555-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 August 5, 2008.

Prothonotary

By: 

Deputy

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

Brit J. Suttell, 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.

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

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

No.: 2008-00555-CD

Real Debt: \$1,142.93

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Justin K. Bloom
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: August 5, 2008

Expires: August 5, 2013

Certified from the record this 5th day of August, 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

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.

JUSTIN K BLOOM
98 Norris Road
Curwensville PA 16833-6521
Defendant(s)

CIVIL DIVISION, ARBITRATION
AND STATUTORY APPEALS ONLY

CASE NO. 08-555-CD

TYPE OF PLEADING:

Praeipce for Writ of Execution

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

Brit J. Suttell, 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# 204140

Attorney's Firm ID# _____

(Signature)

FILED

OCT 22 2008

William A. Shaw
Prothonotary/Clerk of Courts

Atty pd. 2000
1000 6 writs
to Sheriff
G10

PRAECIPE FOR WRIT OF EXECUTION (MONEY JUDGMENT)
Pa.R.C.P. § 3103 to 3149

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

: IN THE COURT OF COMMON PLEAS

v.

: CLEARFIELD COUNTY, PENNSYLVANIA

JUSTIN K BLOOM
98 Norris Road, Curwensville PA 16833-6521
Defendant(s)

: NO. 08-555-CD

CLEARFIELD BANK & TRUST
91 Beaver Drive, DuBois PA 15801
Garnishee(s)

: CIVIL ACTION - LAW

To the Prothonotary: ISSUE A WRIT OF EXECUTION IN THE ABOVE MATTER

1. Directed to the Sheriff of Clearfield County, Pennsylvania
2. against JUSTIN K BLOOM, Defendant(s)
3. and against CLEARFIELD BANK & TRUST, Garnishee(s)
4. and index this writ
 - (a) against _____ Defendant(s)
 - (b) against _____ Garnishee(s)

as a lis pendens against the real property of the defendant(s) in the name of the Garnishee(s) as follows: (specifically describe property)

NO LEVY - GARNISHMENT ONLY

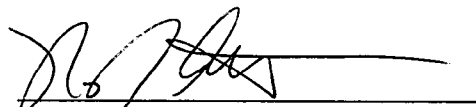
Serve interrogatories on garnishee at: 91 Beaver Drive, DuBois PA 15801

5. Amount Due	\$1,142.93
Interest from 8/5/2008	\$15.08
Total	\$1,158.01*

*Plus writ costs

Dated: October 15, 2008

Prothonotary costs 135.00


Brit J. Suttell, Esquire
Attorney for Plaintiff

NOTE: Under paragraph 1 when the writ is directed to sheriff of another county as authorized by Rule 3103(b), the county should be indicated. Under Rule 3103(c) a writ issued on a transferred judgment may be directed only to the sheriff of the county in which issued. Paragraph 3 above should be completed only if indexing of the execution in the county of issuance is desired as authorized by Rule 3104(a). When the writ issued to another county indexing is required as of course in that county. See Rule 3104(b). Paragraph 4(b) should be completed only if real property in the name of the garnishee is attached and indexing as a lis pendens is desired. See Rule 3104(c).

The firm of Burton Neil & Associates, P.C. is attempting to collect a debt.

FILED

OCT 22 2008

**William A. Shaw
Prothonotary/Clerk of Courts**

Prothonotary costs

CITIBANK (SOUTH DAKOTA), N.A.
Plaintiff

v.
JUSTIN K BLOOM

Defendant(s)
CLEARFIELD BANK & TRUST
Garnishee(s)

: IN THE COURT OF COMMON PLEAS
: CLEARFIELD COUNTY, PENNSYLVANIA
: NO. 08-555-CD
: CIVIL ACTION - LAW

MONEY JUDGMENT

Writ of Execution

COMMONWEALTH OF PENNSYLVANIA, COUNTY OF CLEARFIELD
TO THE SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA

To satisfy the judgment, interest and costs against JUSTIN K BLOOM Defendant:

1. You are directed to levy upon the property of the defendant(s) and to sell the defendant's interest therein; NO LEVY, GARNISHMENT ONLY
2. You are also directed to attach the property of the defendant not levied upon in the possession of CLEARFIELD BANK & TRUST 91 Beaver Drive, DuBois PA 15801 Garnishee, as garnishee and to notify the garnishee that
 - (a) an attachment has been issued;
 - (b) except as provided in paragraph (c), the garnishee is enjoined from paying any debt to or for the account of the defendant and from delivering any property of the defendant or otherwise disposing thereof;
 - (c) the attachment shall not include any funds in an account of the defendant with a bank or other financial institution
 - (i) in which funds are deposited electronically on a recurring basis and are identified as being funds that upon deposit are exempt from execution, levy or attachment under Pennsylvania or federal law, or
 - (ii) that total \$300 or less. If multiple accounts are attached, a total of \$300 in all accounts shall not be subject to levy and attachment as determined by executing officer. The funds shall be set aside pursuant to the defendant's general exemption provided in 42 Pa.C.S. § 8123.
3. If property of the defendant not levied upon and subject to attachment is found in the

possession of anyone other than a named garnishee, you are directed to notify such other person that he or she has been added as a garnishee and is enjoined as above stated.

Amount Due \$1,142.93
Interest from 8/5/2008 \$15.08

COSTS:
Prothonotary \$ 135.00
Sheriff \$

Total* \$1,158.01
*Plus costs per endorsement

SEAL


Prothonotary

Court of Common Pleas of
Clearfield County, Pennsylvania

Per _____
Deputy

**MAJOR EXEMPTIONS UNDER PENNSYLVANIA
AND FEDERAL LAW**

1. \$300 statutory exemption
2. Bibles, school books, sewing machines, uniforms and equipment
3. Most wages and unemployment compensation
4. Social Security benefits
5. Certain retirement funds and accounts
6. Certain veteran and armed forces benefits
7. Certain insurance proceeds
8. Such other exemptions as may be provided by law

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

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-555-CD

CITIBANK (SOUTH DAKOTA) N.A.

vs

JUSTIN K. BLOOM

TO: CLEARFIELD BANK & TRUST, Garnishee

SERVICE # 1 OF 1

WRIT OF EXECUTION; INTERROGATORIES TO GARNISHEE

SERVE BY: 11/21/2008 *ASAP* HEARING: PAGE: 104876

DEFENDANT: CLEARFIELD BANK & TRUST, Garnishee

ADDRESS: 91 BEAVER DRIVE

DUBOIS, PA 15801

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: GARNISHEE

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT OCCUPIED

ATTEMPTS _____

SHERIFF'S RETURN

NOW, 11/21/08 AT 10:48 AM PM SERVED THE WITHIN

WRIT OF EXECUTION; INTERROGATORIES TO GARNISHEE ON CLEARFIELD BANK & TRUST, Garnishee,
DEFENDANT

BY HANDING TO Joelle Adams / Assistant Office Manager

A TRUE AND ATTESTED COPY OF THE ORIGINAL DOCUMENT AND MADE KNOW TO HIM / HER THE CONTENTS
THEREOF.

ADDRESS SERVED 91 Beaver Drive DuBois, PA-15801

NOW _____ AT _____ AM / PM POSTED THE WITHIN

WRIT OF EXECUTION; INTERROGATORIES TO GARNISHEE FOR CLEARFIELD BANK & TRUST, Garnishee

AT (ADDRESS) _____

NOW _____ AT _____ AM / PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF **NOT FOUND** AS TO CLEARFIELD BANK & TRUST, Garnishee

REASON UNABLE TO LOCATE _____

SWORN TO BEFORE ME THIS

_____ DAY OF _____ 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY: Jerome M. Newlin
Deputy Signature

Jerome M. Newlin
Print Deputy Name

5
FILED
013:3064
NOV 21 2008
William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104876
NO: 08-555-CD
SERVICES 1
WRIT OF EXECUTION; INTERROGATORIES TO

GARNISHEE

PLAINTIFF: CITIBANK (SOUTH DAKOTA) N.A.
vs.
DEFENDANT: JUSTIN K. BLOOM
TO: CLEARFIELD BANK & TRUST, Garnishee

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	NEIL	047225	10.00
SHERIFF HAWKINS	NEIL	047225	40.23

S
FILED
01:50 *LM*
DEC 09 2008
LM
William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

_____ Day of _____ 2008

So Answers,

Chester A. Hawkins

Chester A. Hawkins
Sheriff

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.

JUSTIN K BLOOM
98 Norris Road
Curwensville PA 16833-6521

Defendant(s)

CIVIL DIVISION, ARBITRATION
AND STATUTORY APPEALS ONLY

CASE NO. 08-555-CD

TYPE OF PLEADING:

Praecipe for Writ of Execution

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

Brit J. Suttell, Esquire
Burton Neil & Associates, P.C.
1050 Andrew Drive, Suite 170
West Chester, PA 19380
Telephone: 610-696-2120
email: litigation@burt-law.com

Attorney's State ID# 204140

Attorney's Firm ID# _____

(Signature)

I hereby certify this to be a true
and attested copy of the original
statement filed in this case.

OCT 22 2008

Attest.

William A. Brown
Prothonotary/
Clerk of Courts

PRAECIPE FOR WRIT OF EXECUTION (MONEY JUDGMENT)
Pa.R.C.P. § 3103 to 3149

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

: IN THE COURT OF COMMON PLEAS

v.
JUSTIN K BLOOM
98 Norris Road, Curwensville PA 16833-6521
Defendant(s)

: CLEARFIELD COUNTY, PENNSYLVANIA

CLEARFIELD BANK & TRUST
91 Beaver Drive, DuBois PA 15801
Garnishee(s)

: NO. 08-555-CD

: CIVIL ACTION - LAW

To the Prothonotary: ISSUE A WRIT OF EXECUTION IN THE ABOVE MATTER

1. Directed to the Sheriff of Clearfield County, Pennsylvania
2. against JUSTIN K BLOOM, Defendant(s)
3. and against CLEARFIELD BANK & TRUST, Garnishee(s)
4. and index this writ
 - (a) against _____ Defendant(s)
 - (b) against _____ Garnishee(s)

as a lis pendens against the real property of the defendant(s) in the name of the Garnishee(s) as follows: (specifically describe property)

NO LEVY - GARNISHMENT ONLY

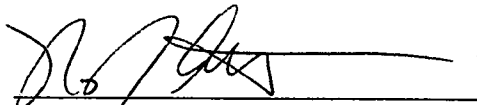
Serve interrogatories on garnishee at: 91 Beaver Drive, DuBois PA 15801

5. Amount Due	\$1,142.93
Interest from 8/5/2008	\$15.08
Total	\$1,158.01*

*Plus writ costs

Dated: October 15, 2008

Prothonotary costs 135.00


Brit J. Suttell, Esquire
Attorney for Plaintiff

NOTE: Under paragraph 1 when the writ is directed to sheriff of another county as authorized by Rule 3103(b), the county should be indicated. Under Rule 3103(c) a writ issued on a transferred judgment may be directed only to the sheriff of the county in which issued. Paragraph 3 above should be completed only if indexing of the execution in the county of issuance is desired as authorized by Rule 3104(a). When the writ issued to another county indexing is required as of course in that county. See Rule 3104(b). Paragraph 4(b) should be completed only if real property in the name of the garnishee is attached and indexing as a lis pendens is desired. See Rule 3104(c).

The firm of Burton Neil & Associates, P.C. is attempting to collect a debt.

CITIBANK (SOUTH DAKOTA), N.A.
Plaintiff

v.
JUSTIN K BLOOM

Defendant(s)
CLEARFIELD BANK & TRUST
Garnishee(s)

: IN THE COURT OF COMMON PLEAS
: CLEARFIELD COUNTY, PENNSYLVANIA
: NO. 08-555-CD
: CIVIL ACTION - LAW

MONEY JUDGMENT

Writ of Execution

COMMONWEALTH OF PENNSYLVANIA, COUNTY OF CLEARFIELD
TO THE SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA

To satisfy the judgment, interest and costs against JUSTIN K BLOOM Defendant:

1. You are directed to levy upon the property of the defendant(s) and to sell the defendant's interest therein; NO LEVY, GARNISHMENT ONLY
2. You are also directed to attach the property of the defendant not levied upon in the possession of CLEARFIELD BANK & TRUST 91 Beaver Drive, DuBois PA 15801 Garnishee, as garnishee and to notify the garnishee that
 - (a) an attachment has been issued;
 - (b) except as provided in paragraph (c), the garnishee is enjoined from paying any debt to or for the account of the defendant and from delivering any property of the defendant or otherwise disposing thereof;
 - (c) the attachment shall not include any funds in an account of the defendant with a bank or other financial institution
 - (i) in which funds are deposited electronically on a recurring basis and are identified as being funds that upon deposit are exempt from execution, levy or attachment under Pennsylvania or federal law, or
 - (ii) that total \$300 or less. If multiple accounts are attached, a total of \$300 in all accounts shall not be subject to levy and attachment as determined by executing officer. The funds shall be set aside pursuant to the defendant's general exemption provided in 42 Pa.C.S. § 8123.
3. If property of the defendant not levied upon and subject to attachment is found in the

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

CITIBANK (SOUTH DAKOTA), N.A.
Plaintiff

v.
JUSTIN K BLOOM

Defendant(s)
CLEARFIELD BANK & TRUST
Garnishee(s)

: IN THE COURT OF COMMON PLEAS
: CLEARFIELD COUNTY, PENNSYLVANIA
: NO. 08-555-CD
: CIVIL ACTION - LAW

MONEY JUDGMENT

Writ of Execution

COMMONWEALTH OF PENNSYLVANIA, COUNTY OF CLEARFIELD
TO THE SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA

To satisfy the judgment, interest and costs against JUSTIN K BLOOM Defendant:

1. You are directed to levy upon the property of the defendant(s) and to sell the defendant's interest therein; NO LEVY, GARNISHMENT ONLY
2. You are also directed to attach the property of the defendant not levied upon in the possession of CLEARFIELD BANK & TRUST 91 Beaver Drive, DuBois PA 15801 Garnishee, as garnishee and to notify the garnishee that
 - (a) an attachment has been issued;
 - (b) except as provided in paragraph (c), the garnishee is enjoined from paying any debt to or for the account of the defendant and from delivering any property of the defendant or otherwise disposing thereof;
 - (c) the attachment shall not include any funds in an account of the defendant with a bank or other financial institution
 - (i) in which funds are deposited electronically on a recurring basis and are identified as being funds that upon deposit are exempt from execution, levy or attachment under Pennsylvania or federal law, or
 - (ii) that total \$300 or less. If multiple accounts are attached, a total of \$300 in all accounts shall not be subject to levy and attachment as determined by executing officer. The funds shall be set aside pursuant to the defendant's general exemption provided in 42 Pa.C.S. § 8123.
3. If property of the defendant not levied upon and subject to attachment is found in the

possession of anyone other than a named garnishee, you are directed to notify such other person that he or she has been added as a garnishee and is enjoined as above stated.

Amount Due \$1,142.93
Interest from 8/5/2008 \$15.08

COSTS:
Prothonotary \$ 135.00
Sheriff \$

Total* \$1,158.01
*Plus costs per endorsement

SEAL



Prothonotary

Received this writ this 22 day
of Oct A.D. 2008
At 3:00 A.M./P.M.

Court of Common Pleas of
Clearfield County, Pennsylvania

Chester A. Haver
Sheriff by Mary Haver

Per _____
Deputy

MAJOR EXEMPTIONS UNDER PENNSYLVANIA AND FEDERAL LAW

1. \$300 statutory exemption
2. Bibles, school books, sewing machines, uniforms and equipment
3. Most wages and unemployment compensation
4. Social Security benefits
5. Certain retirement funds and accounts
6. Certain veteran and armed forces benefits
7. Certain insurance proceeds
8. Such other exemptions as may be provided by law

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

CLEARFIELD County, Pennsylvania
Department of Court Records
Civil Division

COVER SHEET

Plaintiff(s)

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

Case Number:
08-555-CD

Type of Pleading:
Praecipe

FILED *pd \$7.00 Atty*
m/1:50 Lm
MAR 16 2009 *ICC to Atty*
ICC to
Huntington Nat'l
Bank
William A. Shaw
Prothonotary/Clerk of Courts

Code and Classification:

Filed on Behalf of:

Plaintiff
CITIBANK (SOUTH DAKOTA), N.A.

Vs.

Defendant(s)

JUSTIN K BLOOM
98 Norris Road
Curwensville Pa 16833-6521

(Name of the filing party)

 X Counsel of Record
 Individual, if pro se

Name, Address and Telephone Number:

Brit J. Suttell, 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:
204140

Attorney's Firm ID:

(Signature)

Burton Neil & Associates, P.C.
By: Brit J. Suttell, Esquire ID. NO. 204140
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
Plaintiff

v. : CLEARFIELD COUNTY, PENNSYLVANIA

JUSTIN K BLOOM
Defendant : NO. 08-555-CD

and
CLEARFIELD BANK & TRUST
Garnishee : CIVIL ACTION - LAW

Praecipe to Dissolve Attachment

To the Prothonotary:

Dissolve the attachment against CLEARFIELD BANK & TRUST, garnishee.

Burton Neil & Associates, P.C.

By: 

Brit J. Suttell, Esquire
Attorney for Plaintiff

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