

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.  
701 East 60th Street N  
Sioux Falls, SD 57117

: IN THE COURT OF COMMON PLEAS

Plaintiff : CLEARFIELD COUNTY, PENNSYLVANIA

v.

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

: NO. 08-555-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-13718

FILED Atty Ad. 9500  
m/10/08  
MAR 27 2008  
1 CC 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

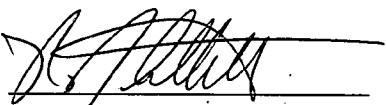
### **Complaint**

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: 

Brit 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 MTR 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	Available Credit Line	Cash Advance Limit	Available Cash Limit	New Balance
BOX 6500 SIOUX FALLS, SD 57117	\$1200	\$0	\$300	\$0	\$1875.93
	Statement/ Closing Date	Amount Over Credit Line	Past Due	Purch/Adv Minimum Due	Minimum Amount Due
	08/13/2007	\$675.93	\$305.42	\$108.17	\$1875.93

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
8/13			Standard Purch LATE FEE - JUL PAYMENT PAST DUE 66 0000 0 PURCHASES*FINANCE CHARGE*PERIODIC RATE 84 0000 0	39.00 70000000000 51.17 70000000000
8/13				

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.

✓ Shauna Houghton  
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

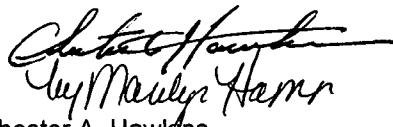
**FILED**  
02:40PM  
JUL 14 2008

William A. Shaw  
Prothonotary/Clerk of Courts

Sworn to Before Me This

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

So Answers,

  
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

11

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:

## Praecept for Default Judgment

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## CODE AND CLASSIFICATION.

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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-la.com](mailto:litigation@burt-la.com)

Attorney's State ID# 204140

Attorney's Firm ID#

(Signature)

FILED Aug 05 2008  
M 11:50 AM 2008 \$20.00  
AUG 05 2008 Notice to Def.

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

60

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 08-555-CD

JUSTIN K BLOOM  
98 Norris Road  
Curwensville PA 16833-6521  
Defendant : CIVIL ACTION - LAW

**Praeclipe 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

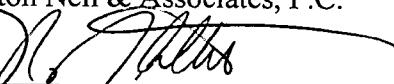
Understanding that false statements herein made are subject to penalty under 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities, I verify that:

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**

Willie L. Suttell 8/15/08  
\_\_\_\_\_  
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.

JUSTIN K BLOOM

: NO. 08-555-CD

Defendant

: CIVIL ACTION - LAW

**Notice of Intention to File Praeclipe 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. Meholic  
Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
Telephone No. 814-765-2641 Ext. 5982

DATE OF NOTICE: July 22, 2008

Burton Neil &amp; Associates, P.C.

By: 

\_\_\_\_\_  
Brit J. Sutell, 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: Willie Sherry  
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 Entry: \$20.00  
Defendant(s)

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:

Praeclipe 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

S

Atty pd.  
20.00  
100-6 Writs  
to Sheriff  
GJ

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

: CLEARFIELD COUNTY, PENNSYLVANIA  
: 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**

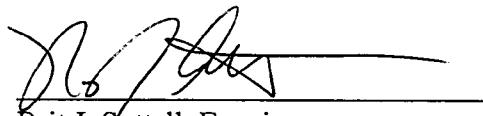
**Serve interrogatories on garnishee at: 91 Beaver Drive, DuBois PA 15801**

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.

**FILED**

OCT 22 2008

William A. Shaw  
Prothonotary/Clerk of Courts

Plaintiff's copy

CITIBANK (SOUTH DAKOTA), N.A. : IN THE COURT OF COMMON PLEAS  
Plaintiff : CLEARFIELD COUNTY, PENNSYLVANIA  
v.  
JUSTIN K BLOOM : NO. 08-555-CD  
Defendant(s) : CIVIL ACTION - LAW  
CLEARFIELD BANK & TRUST  
Garnishee(s)

**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:

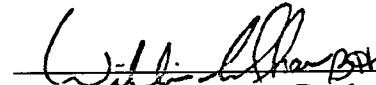
1. You are directed to levy upon the property of the defendant(s) and to sell the defendant's interest therein; NO LEVY, GARNISHMENT ONLY
2. You are also directed to attach the property of the defendant not levied upon in the possession of CLEARFIELD BANK & TRUST 91 Beaver Drive, DuBois PA 15801 Garnishee, 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	COSTS:
Interest from 8/5/2008	\$15.08	Prothonotary \$ 135.00
Total*	\$1,158.01	Sheriff \$

\*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

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**

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RETURN COSTS

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

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

Sworn to Before Me This

So Answers,

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



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:

## 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](mailto: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 E. 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 BANK & TRUST  
91 Beaver Drive, DuBois PA 15801  
Garnishee(s)

: CLEARFIELD COUNTY, PENNSYLVANIA  
: 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. : IN THE COURT OF COMMON PLEAS  
Plaintiff : CLEARFIELD COUNTY, PENNSYLVANIA  
v.  
JUSTIN K BLOOM : NO. 08-555-CD  
Defendant(s)  
CLEARFIELD BANK & TRUST : CIVIL ACTION - LAW  
Garnishee(s)

**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
Total*	\$1,158.01

\*Plus costs per endorsement

COSTS:  
Prothonotary \$135.00  
Sheriff \$

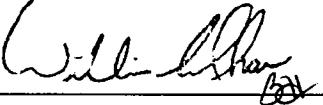
SEAL

Received this writ this 22 day  
of OCT A.D. 2008  
At 3:00 A.M. (P.M.)

Chuter A. Hawley  
Sheriff by Mandy Hens

Court of Common Pleas of  
Clearfield County, Pennsylvania

Per \_\_\_\_\_ Deputy \_\_\_\_\_

  
Prothonotary

#### 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.

CITIBANK (SOUTH DAKOTA), N.A.	: IN THE COURT OF COMMON PLEAS
Plaintiff	
v.	
JUSTIN K BLOOM	: CLEARFIELD COUNTY, PENNSYLVANIA
Defendant(s)	
CLEARFIELD BANK & TRUST	: NO. 08-555-CD
Garnishee(s)	: 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

Total\* \$1,158.01

\*Plus costs per endorsement

COSTS:  
Prothonotary \$ 135.00  
Sheriff \$

SEAL

Received this writ this 12 day  
of OCT A.D. 2008  
At 3:00 A.M. / P.M.

Chester A. Hawley  
Sheriff by Marilyn Hasko

  
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.

**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

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

**Code and Classification:**

**Filed on Behalf of:**

Plaintiff  
CITIBANK (SOUTH DAKOTA), N.A.

Vs.

(Name of the filing party)

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

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](mailto: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

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CITIBANK (SOUTH DAKOTA), N.A. : IN THE COURT OF COMMON PLEAS  
Plaintiff

v. : CLEARFIELD COUNTY, PENNSYLVANIA

JUSTIN K BLOOM : NO. 08-555-CD  
Defendant  
and  
CLEARFIELD BANK & TRUST : CIVIL ACTION - LAW  
Garnishee

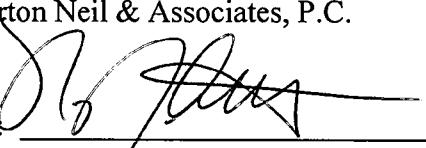
**Praeclipe to Dissolve Attachment**

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.