

08-572-CD
Capital One Bank vs Nicholas J. orson

FILED
MAR 23 2008
M/12:55/W
William A. Shaw
Prothonotary/Clerk of Courts
I LEFT TO SHAW

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

CAPITAL ONE BANK

Plaintiff

vs.

NICHOLAS J LORSON

Defendant

No: 2008-572-CN

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 1400
Pittsburgh, PA 15219
(412) 434-7955
FAX: 412-338-7130
06487198 C N Pit BLK

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

CAPITAL ONE BANK

Plaintiff

vs.

Civil Action No

NICHOLAS J LORSON

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, CAPITAL ONE BANK is a corporation with offices at 15000 CAPITAL ONE DRIVE RICHMOND , VA 23238 .

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

NICHOLAS J LORSON
321 JONES LN
CLEARFIELD, PA 16830

3. Defendant applied for and received a credit card bearing the account number XXXXXXXXXXXXXXXX3043 .

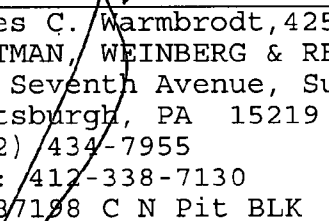
4. Defendant made use of said credit card and has a current balance due of \$1220.60 , as of February 20, 2008 .

5. Defendant is in default by failing to make monthly payments when due. As such, the entire balance is immediately due and payable to Plaintiff.

6. Plaintiff is entitled to the addition of interest at the rate of 28.100% per annum on the unpaid balance from February 20, 2008 . A copy of Plaintiff's STATEMENT is attached hereto, marked as Exhibit "1" and made a part hereof.

7. 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 , NICHOLAS J LORSON , INDIVIDUALLY , in the amount of \$1220.60 with continuing interest thereon at the rate of 28.100% per annum from February 20, 2008 plus costs.



James C. Warmbrodt, 42524
WELTMAN, WEINBERG & REIS CO., L.P.A.
436 Seventh Avenue, Suite 1400
Pittsburgh, PA 15219
(412) 434-7955
FAX: 412-338-7130
06487188 C N Pit BLK

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.

FINANCE CHARGE

Previous Balance	Payments & Credits	FINANCE CHARGE	Transactions	New Balance	Minimum Payment	Due Date
\$804.46	\$0.00	\$18.84	\$29.00	\$852.30	\$352.30	Nov 17, 2006

Sep 18, 2006 -- Oct 17, 2006 Page 1 of 1

MasterCard Platinum Account
5178-0523-2846-3043

Your Account Information
TOTAL CREDIT LINE \$5000.00
TOTAL AVAILABLE CREDIT \$0.00
CREDIT LINE FOR CASH \$5000.00
AVAILABLE CREDIT FOR CASH \$0.00

Finance Charges (Please see reverse for important information)
Balance rate Periodic Corresponding
applied to rate APR CHARGE
Purchases \$814.48 0.07712% D 28.15% \$18.84
Cash \$0.00 0.07712% D 28.15% \$0.00
ANNUAL PERCENTAGE RATE applied this period: 28.15%

At Your Service 1-800-303-3637
To call Customer Relations or to report a lost or stolen card

Send payments to:
Capital One Bank P.O. Box 70884 Charlotte, NC 28272-0884

Send inquiries to:
Capital One P.O. Box 30285 Salt Lake City, UT 84130-0285

Your account is six payments behind. If we charge off your account due to late payments, we will report the charged-off status to several national credit bureaus. Act now to prevent this from happening. Please pay the amount due on your statement or give us a call at 1-800-955-6600. We'll work with you so you can take control of your account and start rebuilding your credit with Capital One.

Payments, Credits & Adjustments

Transactions	17 OCT	PAST DUE FEE
		\$29.00

Your account is 90 days past due and your Payment Protection coverage has been suspended. As stated in your Payment Protection agreement, your coverage and monthly charge will be reinstated once your account is no longer 90 days past due. You may still be eligible for benefits to be paid to your account in cases of disability, unemployment and death. Call Stonebridge Benefit Services at 1-888-527-6904 to see if your situation qualifies for a benefit activation.
You were assessed a past due fee because your minimum payment was not received by the due date. To avoid this fee in the future, we recommend that you allow at least 7 business days for your minimum payment to reach Capital One.

EXHIBIT

6056 506 1 7 17 061017 PAGE 1 of 1 ROS3CY1B 01BC6056
PLEASE RETURN PORTION BELOW WITH PAYMENT

Capital One what's in your wallet?

0 5178052328463043 17 0852300015000352304

Account Number: 5178-0523-2846-3043

Please print address or phone number changes below using blue or black ink

Address

Home Phone

Alternate Phone

Email address

@

Amount Enclosed

New Balance Minimum Payment Due Date

\$852.30

\$352.30

Nov 17, 2006

PLEASE PAY AT LEAST THIS AMOUNT

Capital One Bank
P.O. Box 70884
Charlotte, NC 28272-0884

9029130251016555 MAIL ID NUMBER
NICHOLAS J LORSON
321 JONES LN
CLEARFIELD, PA 16830-7226

Please write your account number on your check or money order made payable to Capital One Bank and mail with this coupon in the enclosed envelope

VERIFICATION

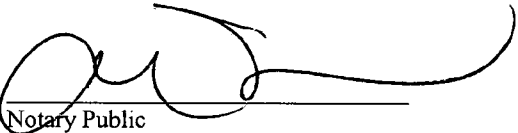
CAPITAL ONE BANK

vs

LORSON, NICHOLAS J

The undersigned does hereby verify subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities, that he/she is, JAMELA SINGLETARY, Authorized Agent, of CAPITAL ONE BANK, Plaintiff Herein, that he/she is duly authorized to make this Declaration, 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.


JAMELA SINGLETARY


Notary Public

5178052328463043

A049

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

ARYONNE MABSON
NOTARY PUBLIC
DEKALB COUNTY, GEORGIA
MY COMMISSION EXPIRES OCT. 29, 2011

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103976
NO: 08-572-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: CAPITAL ONE BANK
vs.
DEFENDANT: NICHOLAS J. LORSON

SHERIFF RETURN

NOW, April 22, 2008 AT 3:07 PM SERVED THE WITHIN COMPLAINT ON NICHOLAS J. LORSON DEFENDANT AT 321 JONES LN, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO NICHOLAS J. LORSON, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DEHAVEN / HUNTER

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	WELTMAN	3314762	10.00
SHERIFF HAWKINS	WELTMAN	3314762	20.00

FILED

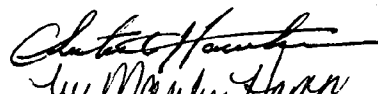
0/2:40cm
JUL 14 2008

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

_____ Day of _____ 2008

So Answers,


Chester A. Hawkins
Sheriff

FILED

JUL 14 2008

William A. Shaw
Prothonotary/Clerk of Courts

FILED No CC.

0/12:20 am

AUG 08 2008

William A. Shaw

Prothonotary/Clerk of Courts
COUNTY

IN THE COURT OF COMMON PLEAS OF Cleaveland
PENNSYLVANIA CIVIL ACTION - LAW

Plaintiff Capital one Bank

: NO. D2008572-CD

VS.

Defendant Nicholas J Lorson

ANSWER

1. I Admit we owe The bill There
Is no denying It
2. I Admit I ASK for some help or who
I could get a Hold to discuss This matter
Due To The fact That my husband had
lost his Job. I Received nothing from Their person
on othe end of phone
3. I Admit That I Then became I'll and
couldn't continue with This because I was In
care of a doctor and wasn't able to help my
husband work It got
4. I Admit we had Fallen on Hard Times because
we lost our home we lost our possessions
They Thing we had left was a broken Dow van
5. I Admitt I was told by An Attorney That
my first step was to find a place to stay
6. I Admitt That I own none of my furniture
It is borrowed or I haven't sinshed paying for
It as of yet

(If new matter is to be completed, continue with the next number after the last number of your answer.)

NEW MATTER

The averments of paragraphs through above are incorporated with this new matter as though fully set forth herein.

WHEREFORE, the Plaintiff respectfully requests that the following relief be granted:

If Counterclaim(s) is\are to be completed, continue with the next number after the last number of your answer.

COUNTERCLAIM ONE

The averments of paragraphs through above are incorporated with this
COUNTERCLAIM as though fully set forth herein.

WHEREFORE, the Defendant respectfully requests that the following relief be granted:

COUNTERCLAIM TWO

The averments of paragraphs through above are incorporated with this
COUNTERCLAIM as though fully set forth herein.

WHEREFORE, the Defendant respectfully requests that the following relief be granted:

Respectfully submitted,

Nicholas J. Dawson

VERIFICATION

I hereby verify that the statements made in this Pleading are true and correct. I understand that false statements herein are made subject to the penalties of 18 PACS 4904, relating to unsworn falsification to authorities.

Nicholas J. Dawson

FILED

AUG 08 2008

William A. Shaw
Prothonotary/Clerk of Courts

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

CAPITAL ONE BANK (USA), NA

Plaintiff

vs.

NICHOLAS J LORSON

Defendant

No. 2008-572-CD

PRAECIPE FOR DEFAULT 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) 434-7955

WWR#6487198
Judgment Amount \$ 1340.36

**THIS LAW FIRM IS ATTEMPTING TO COLLECT THIS DEBT FOR ITS CLIENT AND ANY
INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.**

FILED
M. 3:52 P.M. GK
SEP 08 2008

(6K)
ICC & NOTICE TO DEF.
STATEMENT TO ATTY

William A. Shaw
Prothonotary/Clerk of Courts

ATTY PAID 20.00

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

CAPITAL ONE BANK (USA), NA

Plaintiff

vs.

Civil Action No. 2008-572-CD

NICHOLAS J LORSON

Defendant

PRAECIPE FOR DEFAULT JUDGMENT

TO THE PROTHONOTARY:

Kindly enter Judgment against the Defendant, NICHOLAS J LORSON above named, in the default of an Answer, in the amount of \$1340.36 computed as follows:

Amount claimed in Complaint	\$1,220.60
Interest from 2/20/08 to 8/25/08 at the legal interest rate of 28.100% per annum	\$119.76
TOTAL	\$1340.36

I hereby certify that appropriate Notices of Default, as attached have been mailed in accordance with PA R.C.P. 237.1 on the dates indicated on the Notices.

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) 434-7955

WWR#6487198

Plaintiff's address is:

c/o Weltman, Weinberg & Reis Co., L.P.A., 2718 Koppers Building, 436 7th Avenue, Pittsburgh, PA 15219

And that the last known address of the Defendant is: 321 JONES LN CLEARFIELD, PA 16830

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

COPY

CAPITAL ONE BANK (USA), NA

Plaintiff

vs.

Civil Action No. 2008-572-CD

NICHOLAS J LORSON

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 9-8-08

(xx) Assumpsit Judgment in the amount
 of \$1340.36 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
 (xx) Default
 ☐ Verdict
 ☐ Arbitration
 Award

Prothonotary

By: William L. Loran *GL*
PROTHONOTARY (OR DEPUTY)

NICHOLAS J LORSON
321 JONES LN
CLEARFIELD, PA 16830

Plaintiff's address is:
c/o Weltman, Weinberg & Reis Co., L.P.A., 2718 Koppers Building, 436 7th Avenue, Pittsburgh, PA 15219
1-888-434-0085

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

CAPITAL ONE BANK (USA), NA

Plaintiff

Case # 2008-012-00

NICHOLAS J LORSON

Defendant(s)

IMPORTANT NOTICE


TO: NICHOLAS J LORSON
321 JONES LN
CLEARFIELD, PA 16830

Date of Notice: 8/1/08
WWR#: 06487198

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 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 PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE FOLLOWING OFFICE SET FORTH BELOW. 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.

COURT ADMINSTRATOR
CLEARFIELD COUNTY COURTHOUSE
230 EAST MARKET ST., SUITE 228
CLEARFIELD, PA 16830
(814) 765-2641, ext. 1300-1301

BY: 
PATRICK THOMAS WOODMAN
PA I.D. #34507
WELTMAN, WEINBERG & REIS CO., L.P.A.
1400 KOPPERS BLDG, 436 7TH AVE.
PITTSBURGH, PA 15219

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

CAPITAL ONE BANK (USA), NA

Case no: 2008-572-CD

Plaintiff
vs.

NON-MILITARY AFFIDAVIT

NICHOLAS J LORSON

Defendant

The undersigned, who first being duly sworn, according to law, deposes and states as follows:

That he/she is the duly authorized agent of the Plaintiff in the within matter.

Affiant further states that the within Affidavit is made pursuant to and in accordance with the Servicemembers' Civil Relief Act (SCRA), 50 U.S.C. App. § 521.

Affiant further states that based upon investigation it is the affiant's belief that the Defendant, NICHOLAS J LORSON is not in the military service.

Affiant further states that this belief is supported by the attached certificate from the Defense Manpower Data Center (DMDC), which states that the Defendant, NICHOLAS J LORSON is not in the military service.

Further Affiant sayeth naught.

AFFIANT

SWORN TO AND SUBSCRIBED in my presence this 20th day
of August, 2008

NOTARY PUBLIC

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Wendy L. Gault, Notary Public
City Of Pittsburgh, Allegheny County
My Commission Expires July 15, 2010
Member, Pennsylvania Association of Notaries

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.

Department of Defense Manpower Data Center

AUG-25-2008 09:05:57



Military Status Report
Pursuant to the Servicemembers Civil Relief Act

◀ Last Name	First/Middle	Begin Date	Active Duty Status	Service/Agency
LORSON	NICHOLAS	Based on the information you have furnished, the DMDC does not possess any information indicating that the individual is currently on active duty.		

Upon searching the information data banks of the Department of Defense Manpower Data Center, based on the information that you provided, the above is the current status of the individual as to all branches of the Military.

Mary M. Snavelly-Dixon

Mary M. Snavelly-Dixon, Director
Department of Defense - Manpower Data Center
1600 Wilson Blvd., Suite 400
Arlington, VA 22209-2593

The Defense Manpower Data Center (DMDC) is an organization of the Department of Defense that maintains the Defense Enrollment and Eligibility Reporting System (DEERS) database which is the official source of data on eligibility for military medical care and other eligibility systems.

The Department of Defense strongly supports the enforcement of the Servicemembers Civil Relief Act [50 USCS Appx. §§ 501 et seq] (SCRA) (formerly the Soldiers' and Sailors' Civil Relief Act of 1940). DMDC has issued hundreds of thousands of "does not possess any information indicating that the individual is currently on active duty" responses, and has experienced a small error rate. In the event the individual referenced above, or any family member, friend, or representative asserts in any manner that the individual is on active duty, or is otherwise entitled to the protections of the SCRA, you are strongly encouraged to obtain further verification of the person's active duty status by contacting that person's Military Service via the "defenselink.mil" URL provided below. If you have evidence the person is on active-duty and you fail to obtain this additional Military Service verification, provisions of the SCRA may be invoked against you.

If you obtain further information about the person (e.g., an SSN, improved accuracy of DOB, a middle name), you can submit your request again at this Web site and we will provide a new certificate for that query.

This response reflects current active duty status only. For historical information, please contact the Military Service SCRA points-of-contact.

See: <http://www.defenselink.mil/faq/pis/PC09SLDR.html>

WARNING: This certificate was provided based on a name and Social Security number (SSN) provided

by the requester. Providing an erroneous name or SSN will cause an erroneous certificate to be provided.

Report ID: **FURGQYRCWW**

FILED

SEP 08 2013

William A. Shaw
Prothonotary/Clerk of Courts

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

COPY

Capital One Bank (USA), NA
Plaintiff

No.: 2008-00572-CD

Real Debt: \$1,340.36

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Nicholas J. Lorson
Defendant

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: 8th Day of September, 2008

Expires: 8th Day of September, 2013

Certified from the record this 8th Day of September, 2008



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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