

08-581-CD

NCO Fin. Vs Tina M. Dunsmore

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

NCO Financial Systems, Inc  
507 Prudential Road  
Horsham, PA 19044

Plaintiff

CIVIL ACTION

vs.

TINA M DUNSMORE  
12532 TYRONE PIKE  
CURWENSVILLE PA 16833

Defendant

NO: 08-581-CD

**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 to Defend 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 ON AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT REDUCED FEE OR NO FEE.

MIDPENN LEGAL SERVICES  
211 1/2 E LOCUST STREET  
CLEARFIELD, PA 16830  
814-765-9646

**FILED**

MAR 31 2009

William A. Shaw  
Prothonotary/Clerk of Courts

Att'y pd. 95.00  
cc Sheriff  
cc Att'y

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

NCO Financial Systems, Inc  
507 Prudential Road  
Horsham, PA 19044

Plaintiff

vs.

TINA M DUNSMORE  
12532 TYRONE PIKE  
CURWENSVILLE PA 16833

Defendant

CIVIL ACTION

NO:

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**COMPLAINT**

Plaintiff, NCO Portfolio Purchaser of Citibank, by and through its attorneys, Edwin A. Abrahamsen & Associates, P.C., complains of the Defendant as follows:

1. Plaintiff, NCO Portfolio Purchaser of Citibank, (hereinafter "Plaintiff") is a Pennsylvania corporation with a principal place of business located at 507 Prudential Road Horsham, PA 19044.
2. The Defendant TINA M DUNSMORE (hereinafter "Defendant") is an adult individual residing at 12532 TYRONE PIKE CURWENSVILLE PA 16833.
3. At all relevant times herein, Plaintiff was engaged in the business of debt purchase and collection.
4. Defendant applied for and received a credit card issued by CITIBANK with the account number 5424180553199297.
5. The within account was sold by CITIBANK to Plaintiff for valuable consideration and all rights under said accounts were assigned to Plaintiff.

6. Use of the CITIBANK credit card was subject to the terms of the Cardmember Agreement, a copy of which was sent to the Defendant along with the credit card.

7. Defendant used the CITIBANK credit card account number 5424180553199297, for purchases, cash advances and/or balance transfers, thereby accepting the terms of the Card Member Agreement.

8. The Defendant was mailed account statements relative to the Defendant's use of the subject credit card.

9. The Defendant defaulted under the terms of the Agreement by failing and refusing to make monthly payments on the account as they became due.

10. The account became delinquent on March 16, 2004.

11. The principal amount was \$6,108.24 at the time it was received by Plaintiff.

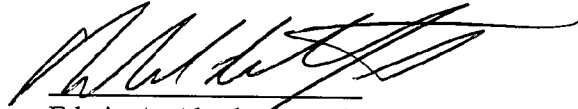
12. Pursuant to the account agreement, any unpaid balance accrues interest at the rate of 25.99%.

13. The total amount due and owing the Plaintiff including interest, is \$11,500.49.

14. Pursuant to the terms of the Agreement, Defendant is liable to Plaintiff for court costs and reasonable attorney's fees.

WHEREFORE, Plaintiff requests judgment in its favor and against Defendant in the amount of \$11,500.49 plus costs of suit, reasonable attorneys' fees of \$1,150.05 and any other relief as the Court deems just and appropriate.

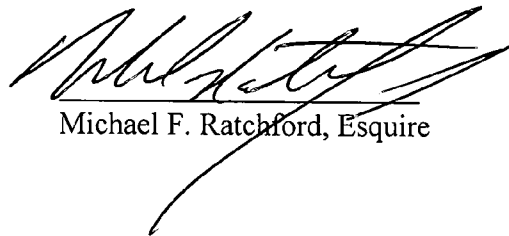
Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Edwin A. Abrahamsen', written over a horizontal line.

Edwin A. Abrahamsen & Assoc.  
Michael F. Ratchford, Esquire  
Scott J. Best, Esquire  
Attorney I.D. Nos.: 86285/93600  
1729 Pittston Avenue  
Scranton, PA 18505  
mratchford@eaa-law.com  
sbest@eaa-law.com

**VERIFICATION**

I, Michael F. Ratchford, attorney for Plaintiff, NCO Financial Systems, Inc, am fully familiar with the facts set forth in the within Complaint and am authorized to make this Verification on behalf of Plaintiff. I Verify that the facts set forth in the within allegations are true and correct to the best of my knowledge, knowing that any false statements are punishable by law pursuant to 18 C.S.A. 4904.

  
Michael F. Ratchford, Esquire

FILED

MAR 31 2008

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103981  
NO: 08-581-CD  
SERVICE # 1 OF 1  
COMPLAINT

PLAINTIFF: NCO FINANCIAL SYSTEMS, INC.  
vs.  
DEFENDANT: TINA M. DUNSMORE

SHERIFF RETURN

NOW, April 03, 2008 AT 9:50 AM SERVED THE WITHIN COMPLAINT ON TINA M. DUNSMORE DEFENDANT AT 12532 TYRONE PIKE, CURWENSVILLE, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO MARYANN DUNSMORE, MOTHER A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: MORGILLO /

FILED

09:57 AM  
JUL 16 2008

William A. Shaw  
Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	ABRAHAMSEN	007927	10.00
SHERIFF HAWKINS	ABRAHAMSEN	007927	24.06

Sworn to Before Me This

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

\_\_\_\_\_

So Answers,

*Chester A. Hawkins*  
*by Marilyn Harris*

Chester A. Hawkins  
Sheriff



IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

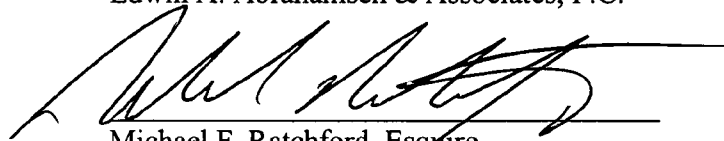
NCO Portfolio Management :  
PURCHASER FROM CITIBANK : CIVIL DIVISION  
:  
Plaintiff :  
:  
vs. :  
:  
TINA M DUNSMORE : NO: 08-581-CD  
:  
Defendant :  
:  
:  
:  
:

**PRAECIPE FOR ENTRY OF DEFAULT JUDGMENT**

**TO THE CLERK OF JUDICIAL RECORDS:**

Kindly enter judgment by default for failure to respond to Plaintiff's Complaint in the amount of \$11,500.49, which includes reasonable attorneys' fees. Notice of the intent to file a default judgment was served upon the Defendant on June 27, 2008. A copy of the Notice of Intent to Take Default Judgment is attached hereto and marked Exhibit "A."

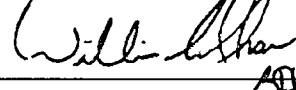
Edwin A. Abrahamsen & Associates, P.C.

  
Michael F. Ratchford, Esquire  
Attorney I.D. No.: 86285  
Attorney for Plaintiff

**JUDGMENT**

AND NOW, this 8<sup>th</sup> day of August, 2008, Judgment is hereby entered in favor of the Plaintiff and against the Defendant in the amount of \$11,500.49, which includes reasonable attorneys' fees for failure to respond to Plaintiff's Complaint.

CLERK OF JUDICIAL RECORDS

  
J.

**FILED** Atty pd. \$20.00  
m 11:09 AM  
AUG 08 2008 ICC Notice to  
Defendant

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

(64)

**IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA**

NCO Portfolio Management  
PURCHASER FROM CITIBANK

Plaintiff : CIVIL DIVISION

vs.

NO: 08-581-CD

TINA M DUNSMORE

Defendant :

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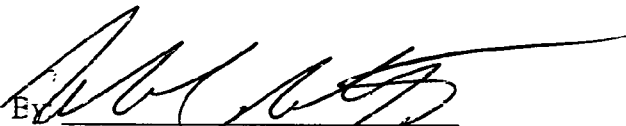
**CERTIFICATE OF SERVICE**

I, Michael F. Ratchford, Esquire, hereby certify that on the date indicated below, I served a copy of the Praecipe for Entry of Default Judgment in the above captioned matter by mailing the same via First Class United States mail, postage prepaid addressed as follows:

TINA M DUNSMORE  
12532 TYRONE PIKE  
CURWENSVILLE PA 16833

Edwin A. Abrahamsen & Associates, P.C.

Date: August 5, 2008



Michael F. Ratchford, Esquire  
Attorney I.D. No.: 86285  
120 Keyser Avenue  
Scranton, PA 18504  
(570) 558-5510

NCO Portfolio Management  
PURCHASER FROM CITIBANK

Plaintiff

vs.

TINA M DUNSMORE

Defendant

In the Court of Common Pleas of  
CLEARFIELD County, Pennsylvania  
Civil Division

NO: 08-581-CD

### NOTICE OF FILING JUDGMENT

Notice is hereby given that a money judgment in the above-captioned matter has been entered against you in the amount of \$ 11,500.49 on August 8, 2008.

By: Willi L. Khan

If you have any questions regarding this notice, please contact the filing party:

Edwin A. Abrahamsen & Associates  
1729 Pittston Avenue  
Scranton, PA 18505  
Telephone: (570)-558-5510

(Notice is given in accordance with PA Supreme Court Rule of Civil Procedure No. 236)

NCO Portfolio Management  
PURCHASER FROM CITIBANK

Plaintiff

vs.

TINA M DUNSMORE

Defendant

In the Court of Common Pleas of  
CLEARFIELD County, Pennsylvania  
Civil Division

NO: 08-581-CD

AFFIDAVIT UNDER SOLDIERS AND SAILORS  
RELIEF CIVIL RELIEF ACT OF 1940 AS  
AMENDED

State of Pennsylvania  
County of CLEARFIELD SS:

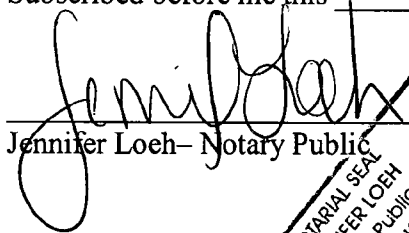
Michael F. Ratchford, Esquire being duly sworn according to law deposes and says that the above named defendant(s): TINA M DUNSMORE; is(are) not in the military service of the United States of America as defined by the Soldiers' and Sailors' Civil Relief Act of 1940 as amended;

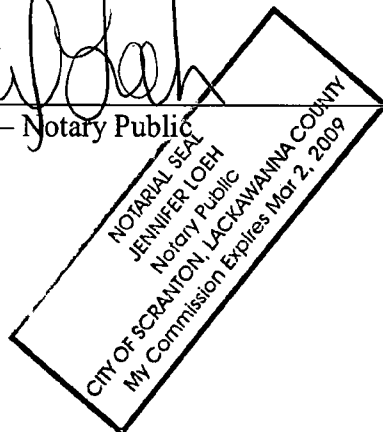
That the defendant(s): TINA M DUNSMORE; is(are) older than eighteen years of age;

That the employment status of the defendant(s): TINA M DUNSMORE; is(are) unknown.

  
Michael F. Ratchford, Esquire

Subscribed before me this 6th day of August 20 08

  
Jennifer Loeh- Notary Public





EDWIN A. ABRAHAMSEN  
MICHAEL F. RATCHFORD  
HEATHER K. WOODRUFF\*  
\*ALSO MEMBER OF FL BAR

THE LAW OFFICE OF  
EDWIN A. ABRAHAMSEN & ASSOCIATES, P.C.  
WWW.EAA-LAW.COM

June 27, 2008

TINA M DUNSMORE  
12532 TYRONE PIKE  
CURWENSVILLE PA 16833

**Re: NCO Portfolio Management PURCHASER FROM CITIBANK v. TINA M DUNSMORE**

*CLEARFIELD County Civil Action No.:08-581-CD*  
Our file No.: N08-0936

Dear TINA M DUNSMORE :

Enclosed please find the Ten Day Notice of Intent to Take Default in regard to the above-noted matter. Please act accordingly.

If you have any questions or wish to discuss your outstanding account, please contact me at (570) 558-5510.

Edwin A. Abrahamsen & Associates,

Michael F. Ratchford, Esquire

Enclosure

This is a communication from a debt collector in an attempt to collect a debt. Any information will be used for that purpose.

**IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA**

NCO Portfolio Management	:	
PURCHASER FROM CITIBANK	:	CIVIL ACTION
	:	
Plaintiff	:	
	:	
	:	
vs.	:	
	:	NO: <u>08-581-CD</u>
TINA M DUNSMORE	:	
	:	
Defendant	:	
	:	
	:	
	:	

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**TEN DAY NOTICE OF INTENT TO TAKE DEFAULT JUDGMENT**

To: TINA M DUNSMORE  
12532 TYRONE PIKE  
CURWENSVILLE PA 16833

Date of Notice: June 27, 2008

**IMPORTANT NOTICE PURSUANT TO PA.R.C.P. 237.1(a)(2)**

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER AN APPEARANCE PERSONALLY OR BY AN 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 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.

MIDPENN LEGAL SERVICES  
211 1/2 E LOCUST STREET  
CLEARFIELD, PA 16830

814-765-9646

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

NCO Portfolio Management	:	
PURCHASER FROM CITIBANK	:	CIVIL ACTION
	:	
Plaintiff	:	
	:	
	:	
vs.	:	
	:	NO: <u>08-581-CD</u>
TINA M DUNSMORE	:	
	:	
Defendant	:	
	:	
	:	
	:	

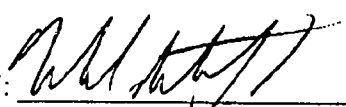
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**CERIFICATE OF SERVICE**

I, Michael F. Ratchford, Esquire, hereby certify that on June 27, 2008 I served a copy of the Ten Day Notice of Intent to Take Default in the above captioned matter by mailing the same via First Class United States mail, postage prepaid addressed as follows:

TINA M DUNSMORE  
12532 TYRONE PIKE  
CURWENSVILLE PA 16833

Edwin A. Abrahamsen & Associates, P.C.

BY:   
Michael F. Ratchford, Esquire  
Attorney I.D. No. 86285  
1729 Pittston Avenue  
Scranton, PA 18505  
(570) 558-5510

**FILED**

**AUG 08 2008**

William A. Shaw  
Prothonotary/Clerk of Courts



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

COPY

NCO Financial Systems, Inc.  
Plaintiff(s)

No.: 2008-00581-CD

Real Debt: \$11,500.49

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Tina M. Dunsmore  
Defendant(s)

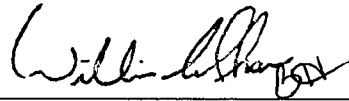
Entry: \$20.00

Instrument: Default Judgment

Date of Entry: August 8, 2008

Expires: August 8, 2013

Certified from the record this 8th 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