

08-1059-CD
Citibank vs R. Keith Saline

FILED
M 1 15 2009
JUN 09 2009 Atty pd. \$95.00
William A. Shaw
Prothonotary/Clerk of Courts

Burton Neil & Associates, P.C.
By: Yale D. Weinstein, Esquire ID. NO. 89678
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.

R KEITH SALINE : NO. 08-1059-CD
889 Treasure Lake, Du Bois PA 15801-9021
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. Meholic
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
Telephone No. 814-765-2641 Ext. 5982

Burton Neil & Associates, P.C.
By: Yale D. Weinstein, Esquire ID. NO. 89678
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.

R KEITH SALINE
889 Treasure Lake, Du Bois PA 15801-9021

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 R Keith Saline, who resides at 889 Treasure Lake, Du Bois, 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 xxxx-xxxx-xxxx- 5369 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 \$19,480.82 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 \$19,480.82, and the costs of this action.

Burton Neil & Associates, P.C.
By: _____
Yale D. Weinstein, Esquire
Attorney for Plaintiff

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

03/17/08 \$19480.82 \$19480.82 SITE:KC-CL TM:CO-5000 ACID:KCB0201
 PAY-DUE DATE NEW BALANCE MIN-AMT-DUE 04/25/08 23:17:30

R KEITH SALINE
 889 TREASURE LAKE
 DU BOIS
 15801-9021000

PA

CITI CARDS
 PO BOX 183065
 COLUMBUS, OH
 43218-3065

C, 15/7/24

**Citi® Driver's Edge®
 Platinum Select® Card-Charter Rbts**



Account Number

Customer Service:

1-800-568-5000	Total Credit Line	Available Credit Line	Cash Advance Limit	Available Cash Limit	New Balance
BOX 6500	\$17670	\$0	\$4800	\$0	\$19480.82
SIOUX FALLS, SD	Statement/Closing Date	Amount Over Credit Line	Past Due	Purch/Adv Minimum Due	Minimum Amount Due
57117	02/21/2008	\$1810.82	\$3351.59	\$706.16	\$19480.82

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
2/21			Standard Purch LATE FEE - JAN PAYMENT PAST DUE 66 0000	39.00 0000000000
2/21			PURCHASES*FINANCE CHARGE*PERIODIC RATE 84 0000	413.29 0000000000
2/21			Standard Adv ADVANCES*FINANCE CHARGE*PERIODIC RATE 84 0000	43.57 0000000000
2/21			Purch/Adv Thru 01/21/2005 PURCHASES*FINANCE CHARGE*PERIODIC RATE 84 0000	16.30 0000000000

Your late fee was based on your account balance as of the payment due date (02/15/08), which was \$18,968.66.

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	\$17,222.11	\$39.00	\$0.00	\$429.59	\$17,690.70
ADVANCES	\$1,746.55	\$0.00	\$0.00	\$43.57	\$1,790.12
TOTAL	\$18,968.66	\$39.00	\$0.00	\$473.16	\$19,480.82

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE	Days This Billing Period: 30
PURCHASES					
Standard Purch	\$16,767.49	0.08216%(D)	29.990%	29.990%	
Purch/Adv thru 01/21/2005	\$661.38	0.08216%(D)	29.990%	29.990%	
ADVANCES					
Standard Adv	\$1,767.52	0.08216%(D)	29.990%	29.990%	

EXHIBIT A

Verification

Shauna Houghton

I, _____ 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**

R Keith Saline
[REDACTED]

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
NO: 08-1059-CD

Sect 4 Lot 116

375-0333

CITIBANK (SOUTH DAKOTA) N.A.
vs
R. KEITH SALINE

SERVICE # 1 OF 1

COMPLAINT

SERVE BY: 07/09/2008 HEARING: PAGE: 104260

FILED

07/31/2008
JUN 24 2008

DEFENDANT: R. KEITH SALINE
ADDRESS: 889 TREASURE LAKE
DUBOIS, PA 15801

ALTERNATE ADDRESS POSS 911 (10584 TREASURE LAKE ROAD)

William A. Shaw
Prothonotary/Clerk of Courts

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT

OCCUPIED

ATTEMPTS Sec 4 Lot 116 375-0333

1 on maturea 0 on T.L.R.D. 3 on D

SHERIFF'S RETURN

NOW, THIS 29TH DAY OF JUNE 2008 AT 11:10 AM PM SERVED THE WITHIN
COMPLAINT ON R. KEITH SALINE, DEFENDANT

BY HANDING TO Keith Saline 1 DEFENDANT

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

ADDRESS SERVED Sec 4. Lot 116 - Treasure Lake, Dubois, PA 15801

NOW _____ AT _____ AM / PM POSTED THE WITHIN

COMPLAINT FOR R. KEITH SALINE

AT (ADDRESS) _____

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

I MAKE RETURN OF **NOT FOUND** AS TO R. KEITH SALINE

REASON UNABLE TO LOCATE _____

So Answers: CHESTER A. HAWKINS, SHERIFF

BY: Mark A. Condit

Deputy Signature

Mark A. Condit

Print Deputy Name

SWORN TO BEFORE ME THIS

DAY OF 2008

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104260
NO: 08-1059-CD
SERVICES 1
COMPLAINT

PLAINTIFF: CITIBANK (SOUTH DAKOTA) N.A.

vs.

DEFENDANT: R. KEITH SALINE

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	NEIL	042053	10.00
SHERIFF HAWKINS	NEIL	042053	37.61

FILED
013:034
SEP 29 2008
WAS
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.

R KEITH SALINE
889 Treasure Lake
Du Bois PA 15801-9021

Defendant(s)

CIVIL DIVISION, ARBITRATION
AND STATUTORY APPEALS ONLY

CASE NO. 08-1059-CD

TYPE OF PLEADING: _____

Praecipe 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

Yale D. Weinstein, 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# 89678

Attorney's Firm ID# _____

(Signature)

5 **FILED** at \$20.00 AM
m 1.35 cm ICC notice
OCT 24 2008 to deft
LAW Statement to Atty.

William A. Shaw
Prothonotary/Clerk of Courts

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.

R KEITH SALINE
889 Treasure Lake
Du Bois PA 15801-9021
Defendant

: NO. 08-1059-CD

: CIVIL ACTION - LAW

Praecipe 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:	\$19,480.82
TOTAL	\$19,480.82

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:

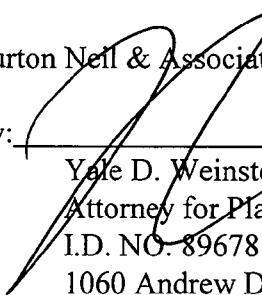
1. The above are the precise last-known addresses of the judgment debtor and creditor.
2. The annexed notice of intention to file this praecipe was mailed to all parties against whom judgment is to be entered and to their record attorneys, if any, after the default occurred, and at least ten days prior 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 P.A.R.CIV.P. 236**

Pro Prothonotary

Burton Neil & Associates, P.C.

By:


Yale D. Weinstein, Esquire

Attorney for Plaintiff

I.D. NO. 89678

1060 Andrew Drive, Suite 170
West Chester, PA 19380

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

C-15724

CITIBANK (SOUTH DAKOTA), N.A.

: IN THE COURT OF COMMON PLEAS

Plaintiff

: CLEARFIELD COUNTY, PENNSYLVANIA

v.

: NO. 08-1059-CD

R KEITH SALINE

Defendant

: CIVIL ACTION - LAW

Notice of Intention to File Praeclipe for Default Judgment

TO: R Keith Saline
889 Treasure Lake
Du Bois PA 15801-9021

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: October 7, 2008

Burton Neil & Associates, P.C.

By:

Yale D. Weinstein, Esquire
Attorney for Plaintiff
Identification No. 89678
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: Yale D. Weinstein, Esquire ID. NO. 89678
1060 Andrew Drive, Suite 170
West Chester, PA 19380
610-696-2120

Attorney for Plaintiff

CITIBANK (SOUTH DAKOTA), N.A.

Plaintiff

: IN THE COURT OF COMMON PLEAS

v.

: CLEARFIELD COUNTY, PENNSYLVANIA

R KEITH SALINE

Defendant

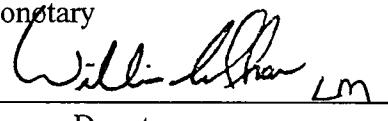
: CIVIL ACTION - LAW

Rule of Civil Procedure NO. 236 (Revised)

Notice is given that a JUDGMENT in the above captioned matter has been entered
against you on October 24, 2008.

Prothonotary

By:



Deputy

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

Yale D. Weinstein, 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.: 2008-01059-CD

Real Debt: \$19,480.82

Atty's Comm: \$

Vs. Costs: \$

Int. From: \$

R. Keith Saline
Defendant(s)

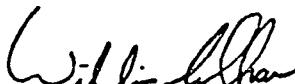
Entry: \$20.00

Instrument: Default Judgment

Date of Entry: October 24, 2008

Expires: October 24, 2013

Certified from the record this October 24, 2008



m

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