

08-1346-CD

Arrow Financial vs Larry Donaldson

**COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA**

ARROW FINANCIAL SERVICES, LLC ASSIGNEE OF
FIA CARD SERVICES, N.A. (BANK OF AMERICA) No. 2008-1346-CD

C/O Mann Bracken LLC
4660 TRINDLE ROAD, SUITE 300
CAMP HILL, PA 17011

Plaintiff

Type of Case: Contract

VS.

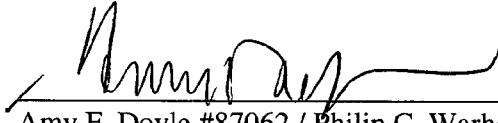
LARRY L DONALDSON
428 E PARK AVE
DU BOIS PA 15801

Type of Pleading:

Filed on Behalf of: Plaintiff

Defendant(s)

Date: 7/16/08


Amy F. Doyle #87062 / Philip C. Warholic #86341 /
David R. Galloway #87326 / Sarah E. Ehasz #86469 /
Robert N. Polas, Jr. #201259

Mann Bracken LLC
The Successor by Merger to Wolpoff & Abramson, L.L.P.
and Eskanos & Adler, P.C.
4660 Trindle Road, Suite 300, Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

FILED
M 10:46AM GK 1CC ATRY
JUL 23 2008 1 Compl. Shff
William A. Shaw
Prothonotary/Clerk of Courts ATRY PAID 95.00

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

| | | |
|---|---|--------------------|
| ARROW FINANCIAL SERVICES, LLC | : | |
| ASSIGNEE OF FIA CARD SERVICES, N.A. (BANK OF AMERICA) | : | No. |
| Plaintiff | : | |
| vs | : | CIVIL ACTION - LAW |
| LARRY L DONALDSON | : | |
| Defendant(s) | : | |

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 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 or any other claim or relief requested by the Plaintiff. You may lose money or property 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 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.

Clearfield County Courthouse
David S. Meholic, Court Administrator 230 East Market Street
Clearfield, PA 16830
814-765-2641

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

| | | |
|---|---|--------------------|
| ARROW FINANCIAL SERVICES, LLC | : | |
| ASSIGNEE OF FIA CARD SERVICES, N.A. (BANK OF AMERICA) | : | No. |
| Plaintiff | : | |
| vs | : | CIVIL ACTION - LAW |
| LARRY L DONALDSON | : | |
| Defendant(s) | : | |

NOTICIA

USTED HA SIDO DEMANDADO/A EN LA CORTE. Si usted desea defender conta la demanda puestas en las siguientes paginas, usted tienen que tomar acción dentro veinte (20) dias después que esta Demanda y Aviso es servido, con entrando por escrito una apariencia personalmente o por un abogado y archivando por escrito con la Corte sus defensas o objeciones a las demandas puestas en esta contra usted. Usted es advertido que si falla de hacerlo el caso puede proceder sin usted y un juzgamiento puede ser entrado conta usted por la Corte sin mas aviso por cualquier dinero reclamado en la Demanda o por cualquier otro reclamo o alivio solicitado por Demandante. Usted puede perder dinero o propiedad o otros derechos importante para usted.

USTED DEBE LLEVAR ESTE PAPEL A SU ABOGADO ENSEGUIDA. SI USTED NO TIENE UN ABOGADO, VAYA O LLAME POR TELEFONO LA OFICINA FIJADA AQUI ABAJO. ESTA OFICINA PUEDE PROVEERE CON INFORMACION DE COMO CONSEGUIR UN ABOGADO.

SI USTED NO PUEDE PAGARLE A UN ABOGADO, ESTA OFICINA PUEDE PROVEERE INFORMACION ACERCA AGENCIAS. QUE PUEDAN OFRECER SERVICIOS LEGAL A PERSONAS ELIGIBLE AQ UN HONORARIO REDUCIDO O GRATIS.

Clearfield County Courthouse
David S. Meholick, Court Administrator 230 East Market Street
Clearfield, PA 16830
814-765-2641

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

| | |
|---|----------------------|
| ARROW FINANCIAL SERVICES, LLC | : |
| ASSIGNEE OF FIA CARD SERVICES, N.A. (BANK OF AMERICA) | : No. |
| Plaintiff | : |
| vs | : CIVIL ACTION - LAW |
| LARRY L DONALDSON | : |
| Defendant(s) | : |

COMPLAINT

AND NOW, comes the Plaintiff, by and through its attorneys and the law firm of Mann Bracken LLC, and files this Complaint and in support avers as follows:

1. Plaintiff is ARROW FINANCIAL SERVICES, LLC ASSIGNEE OF FIA CARD SERVICES, N.A. (BANK OF AMERICA) , located at 5996 W. Touhy Avenue Niles, IL 60714.
2. Defendant, LARRY L DONALDSON, is an adult individual with a last known address of 428 E Park Ave Du Bois, Clearfield County, PA 15801.
3. It is averred that Defendant was issued an open end credit card account.
4. At all relevant times material hereto, Defendant has used said charge card for the purchase of products, goods and/or for obtaining services.

5. Defendant was provided with copies of the Statement of Accounts showing all debits and credits for transactions on the aforementioned credit card account to which there was no bona fide objection by Defendant. A true and correct copy of the Statement of Account is attached hereto, incorporated herein and marked as Exhibit "A".

6. As of the date of this Complaint, the remaining balance due, owing and unpaid on Defendant's credit card account as a result of the charges made by said Defendant and/or any authorized users is the sum of \$3,684.20.

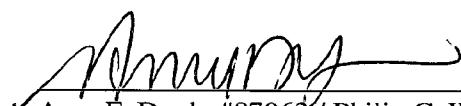
7. Despite reasonable and repeated demands for payment, Defendant has refused and continues to refuse to pay all sums due and owing on the aforementioned account balance, all to the damage and detriment of the Plaintiff.

8. The amount in controversy is within the jurisdictional amount requiring compulsory arbitration.

WHEREFORE, Plaintiff respectfully requests this Honorable Court enter Judgment in favor of the Plaintiff and against Defendant(s) in the amount of \$3,684.20, plus costs of this action and any other relief as this Court deems just and reasonable.

Respectfully Submitted,

Date: 7/18/08


Amy F. Doyle #87062 / Philip C. Warholic #86341 /
David R. Galloway #87326 / Sarah E. Ehasz #86469 /
Robert N. Polas, Jr. #201259
Mann Bracken LLC
The Successor by Merger to Wolpoff & Abramson, L.L.P.
and Eskanos & Adler, P.C.
4660 Trindle Road, Suite 300, Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

VERIFICATION

The undersigned hereby states that they are the attorney for the Plaintiff who is located outside of this jurisdiction and in order to file the within document in an expedient and timely manner, they are authorized to take this verification on behalf of said Plaintiff in the within action and verifies that the statements made in the foregoing Pleading are true and correct to the best of their knowledge, information, and belief, based upon information provided by the Plaintiff.

The undersigned understands that false statements herein are made subject to the penalties of 18 Pa.C.S. Section 4904, relating to unsworn falsification to authorities.

Date: 7/18/08



Amy F. Doyle #87062 / Philip C. Warholic #86341 /
David R. Galloway #87326 / Sarah E. Ehasz #86469 /
Robert N. Polas, Jr. #201259
Mann Bracken LLC
The Successor by Merger to Wolpoff & Abramson, L.L.P.
and Eskanos & Adler, P.C.
4660 Trindle Road, Suite 300, Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

Exhibit "A"

••FICHINFO1 •• Date 04/04/08 Account 2978 Mode L ••Nxt + •
ACCOUNT# 5758 CLIENT# 001744
CLIENT NAME ARROW FINANCIAL SERVICES
OPEN DATE 07/14/2005
LAST PAYMENT DATE 09/11/2006
CHARGE-OFF DATE 04/28/2007
SERVICE DATE 11/17/2006
INITIAL BALANCE 00003179.34 CURRENT BALANCE 00003684.20
CL INT ACCT # ISSUER
6717W FIA CARD SERVICES, N.A. (BANK OF AMERICA)
*** ARROW IT MISC BANK OF AMERICA B OF A FRESH FLBANKCARD
*WW-PRNCPL-BAL *WW-INTRST-BAL *WW-MISC-BAL-3 *WW-MISC-BAL-4
00003179.34 00000000.00 00000000.00 00000000.00
** OTHER BALANCES **
*WW-AFS-INTRST *WW-COURT-COST *WW-ATTY-FEE *WW-POST-JUDG *WW-AFS-MISC-1
00000504.86 00000000.00 00000000.00 00000000.00 00000000.00
** WW-RATES: *WW-COMMISSION *WW-AGGREGATE *WW-SETTLEMENT
027.00 050.00 030.00
** WW-PLACEMNT-MISC *WW-PLACEMENT-TYPE *WW-PLACEMNT-PERIOD *WW-ARROW-SCORE
000POE 000 00002
**** ISSUER SUB-NAME **** *WW-CB-FLAG*
FIA CARD SERVICES, N.A. (BANK OF Y
* ••MODE L=LFT R=RGT W=WRP Next File •

••FICHINFO1 •• Date 04/04/08 Account 2978 Mode L ••Nxt + •
** DEBTOR INFORMATION **
*WW-CL-ACCT-NO *WW-SSN-1
5758 XXX-XX-8856
*WW-L-NAME-1 *WW-F-NAME-1
DONALDSON JR LARRY L
*WW-ADDR1-1 *WW-ADDR2-1
428 E PARK AVE
*WW-CITY-1 *WW-ST-1 *WW-ZIP-1
DU BOIS PA 158012268
*WW-H-PH-1 *WW-W-PH-1 *WW-PH-ALT
814-372-2014
*WW-POE *WW-POE-ADDR1
APPALACHIAN WELL
*WW-POE-CITY *WW-POE-ST *WW-POE-ZIP
*** SELLER IS FIA CARD SERVICES, NA
*WW-ATTY-FIRM-ID *WW-ATTY-ADDRESS
448
*WW-JUDGMENT-DT *WW-JUDGMNT-AMT *WW-JDG-INT *WW-JDG-INT-AMT *WW-JDG-ATTY-FEE
00000000.00 0000000 00000000.00 00000000.00
*WW-SUIT-DATE *WW-SUIT-CASE-NO *WW-COURT-NAME *WW-COURT-COST
00000000.00
* ••MODE L=LFT R=RGT W=WRP Next File •

••FICHINFO1 •• Date 04/04/08 Account 2978 Mode L ••Nxt + •
*** BANK INFORMATION ***
*WW-TRUST *WW-DEBTOR *WW-CO-HOLDER
*WW-BANK-NAME *WW-BANK-ABA-NO *WW-BANK-ACCT-NO
ARROW
*WW-PAYOUT *WW-INT-THRU-DT *WW-BANK-LAST-PAY-AMT
18.000 03/25/2008 00000000.00
*WW-ARROW-NAME *WW-CHG-CARD *WW-PRODUCT-TYPE
ARROW FINANCIAL SERVICES LLC 01
*** SUPPLEMENTAL INFORMATION ***

••MODE L=LFT R=RGT W=WRP Next File •

FILED

JUL 23 2008

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104440
NO: 08-1346-CD
SERVICES 1
COMPLAINT

PLAINTIFF: ARROW FINANCIAL SERVICES, LLC, Assignee
vs.

DEFENDANT: LARRY L. DONALDSON

5 FILED
013:31 AM
DEC 23 2008
William A. Shaw
Sheriff/Clerk of Courts

SHERIFF RETURN

RETURN COSTS

| Description | Paid By | CHECK # | AMOUNT |
|-----------------|---------|---------|--------|
| SURCHARGE | MANN | 005207 | 10.00 |
| SHERIFF HAWKINS | MANN | 005207 | 40.65 |

Sworn to Before Me This

So Answers,

Day of _____ 2008



Chester A. Hawkins
Sheriff

FILED
DEC 23 2008

William A. Shaw
Prothonotary/Clerk of Courts

Notice of Proposed Termination of Court Case

March 2, 2012

RE: 2008-01346-CD

Arrow Financial Services, LLC
FIA Card Services, N.A.
Bank Of America

Vs.

Larry L. Donaldson

RECD
3/2/2012
William A. Shirey
Prothonotary/Clerk of Courts
62

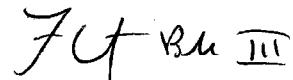
To All Parties and Counsel:

Please be advised that the Court intends to terminate the above captioned case without notice, because the Court records show no activity in the case for a period of at least two years.

You may stop the Court terminating the case by filing a Statement of Intention to Proceed. The Statement of Intention to Proceed must be filed with the **Prothonotary of Clearfield County, PO Box 549, Clearfield, Pennsylvania 16830**. The Statement of Intention to Proceed must be filed on or before **May 2, 2012**.

If you fail to file the required statement of intention to proceed within the required time period, the case will be terminated.

By the Court,



F. Cortez Bell, III, Esq.
Court Administrator

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

ARROW FINANCIAL SERVICES, LLC, et al
Plaintiffs
vs.
LARRY L. DONALDSON
Defendant

* NO. 2008-1346-CD
*
*
*
*
*

ORDER

NOW, this 26th day of June, 2013, upon the Court's review of the record, with the Court noting from the docket there has been no activity in the case since December 23, 2008, and that a Notice of Proposed Termination of Court Case had been mailed to the parties March 2, 2012 with no response having been received, pursuant to the provisions of Rule of Judicial Administration 1901 the case is hereby DISMISSED for inactivity. The Prothonotary shall code the case in Full Court as Z-1901A.

BY THE COURT,


FREDRIC J. AMMERMAN
President Judge

6/27/2013 No CC
S 6/9/2013
Z JUN 27 2013
OL
William A. Shaw
Prothonotary Clerk of Courts