

08-1358-CD
Independence Rec. vs Jennifer Meckley

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

INDEPENDENCE RECEIVABLES CORPORATION
ASSIGNEE OF GLASS MOUNTAIN ASSIGNEE OF
BANK OF AMERICA

No. 2008-1358-CD

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

Type of Case: Contract

Type of Pleading:

VS.

Filed on Behalf of: Plaintiff

JENNIFER HANSEL-MECKLEY
650 ELIZABETH ST
HOUTZDALE PA 16651

Defendant(s)

Date: 7/16/08



Amy F. Doyle #87062 / Philip C. Warholik #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 2:50pm GK
JUL 24 2008

ICC ACTY

1 Compl. SHFF

William A. Shaw
Prothonotary/Clerk of Courts

ATTY PAID 95.00

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

INDEPENDENCE RECEIVABLES CORPORATION
ASSIGNEE OF GLASS MOUNTAIN
ASSIGNEE OF BANK OF AMERICA
Plaintiff

vs

JENNIFER HANSEL-MECKLEY
Defendant(s)

:
: No.
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: CIVIL ACTION - LAW
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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. Meholick, Court Administrator 230 East Market Street
Clearfield, PA 16830
814-765-2641

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

INDEPENDENCE RECEIVABLES CORPORATION
ASSIGNEE OF GLASS MOUNTAIN
ASSIGNEE OF BANK OF AMERICA
Plaintiff

vs

JENNIFER HANSEL-MECKLEY
Defendant(s)

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NOTICIA

USTED HA SIDO DEMANDADO/A EN LA CORTE. Si usted desea defender contra 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 contra 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.

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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

INDEPENDENCE RECEIVABLES CORPORATION
ASSIGNEE OF GLASS MOUNTAIN
ASSIGNEE OF BANK OF AMERICA
Plaintiff

vs

JENNIFER HANSEL-MECKLEY
Defendant(s)

:
: No.
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: CIVIL ACTION - LAW
:
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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 INDEPENDENCE RECEIVABLES CORPORATION ASSIGNEE OF GLASS MOUNTAIN ASSIGNEE OF BANK OF AMERICA , located at 702 King Farm Blvd Rockville, MD 20850.
2. Defendant, JENNIFER HANSEL-MECKLEY, is an adult individual with a last known address of 650 Elizabeth St Houtzdale, Clearfield County, PA 16651.
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 \$1,935.01.

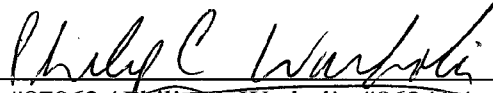
7. Despite reasonable and repeated demands for payment, Defendant has refused and continues to refuse to pay all sums due and owing on the aforementioned account balance, all to the damage and detriment of the Plaintiff.

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 \$1,935.01, plus costs of this action and any other relief as this Court deems just and reasonable.

Respectfully Submitted,

Date: 7/16/08



Amy F. Doyle #87062 / ~~Philip C. Warhol~~ #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: 7/16/08



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Telephone: (717) 303-6700
Counsel for Plaintiff

Exhibit "A"

••FICHINFO1 •• Date 10/04/07 Account [REDACTED] 4429 Mode L ••Nxt + •
ACCOUNT# [REDACTED] 4429 CLIENT# 001978 ACCT BALANCE \$1,935.01
LPYMT DT 09/23/04
OPEN DT 10/07/03
CHRG OFF DT 05/14/05
PURCHASE DT 09/29/07
*CC2-DEBT-NAME *CC2-DEBT-SALUT*CC2-DEBT-ALIAS
HANSEL-MECKLEY, JENNIFER
*CC2-DEBT-ADDR *CC2-DEBT-CITY-ST *CC2-DEBT-ZIP*CC2-DEBT-PHONE
650 ELIZABETH STREET HOUTZDALE, PA 16651 0000000000
*CC2-DEBT-FAX*CC2-DEBT-SSN *CC2-RFILE-NR*CC2-DEBT-DOB*CC2-DEBT-DRIVERS-LIC
XXX-XX-7205
*CC-REC-TYPE*CC-FILENO *CC-FORW-FILE *CC-MASCO-FILE *CC-FORW-ID
01 0300188030 [REDACTED] 4429 MD16 INDP
*CC-FIRM-ID*CC1-DATE-FORW*CC1-LIST-FORW*CC1-COMM*CC1-SUIT-FEE*CC1-ORIG-AMT-OUT
XLLP 10/03/07 \$.00 \$1,935.01
*CC1-INT-AMT-OUT*CC1-ORIG-INT-DATE*CC1-CRED-NAME
\$.00 09/23/04 INDEPENDENCE
*CC1-CRED-NAME2 *CC1-CRED-ADDR *CC1-CRED-CITY-ST
*CC1-CRED-ZIP*CC1-BAL-AMT-OUT*CC1-TYPE*CC1-LPAY-DATE*CC1-LPAY-AMT-OUT
0000000193501 09/23/04 \$.00

•MODE L=LFT R=RGH W=WRP Next File •

FILED

JUL 24 2008

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-1358-CD

INDEPENDENCE RECEIVABLES CORPORATION Assignee of Glass Mountain

Assignee

vs

JENNIFER HANSEL-MECKLEY

SERVICE # 1 OF 1

COMPLAINT

SERVE BY: 08/23/2008

HEARING:

PAGE: 104452

DEFENDANT: JENNIFER HANSEL-MECKLEY

ADDRESS: 650 ELIZABETH ST.
HOUTZDALE, PA 16651

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

OCCUPIED

ATTEMPTS

SHERIFF'S RETURN

NOW, _____ AT _____ AM / PM **SERVED** THE WITHIN

COMPLAINT ON JENNIFER HANSEL-MECKLEY, DEFENDANT

BY HANDING TO _____ / _____

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

ADDRESS SERVED _____

NOW _____ AT _____ AM / PM **POSTED** THE WITHIN

COMPLAINT FOR JENNIFER HANSEL-MECKLEY

AT (ADDRESS) _____

NOW 7-31-08 AT 10:37 AM / PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF **NOT FOUND** AS TO JENNIFER HANSEL-MECKLEY

REASON UNABLE TO LOCATE Def. Moved To Port MATilda

SWORN TO BEFORE ME THIS

_____ DAY OF _____ 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY: _____

Deputy Signature

Print Deputy Name

COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

INDEPENDENCE RECEIVABLES CORPORATION
ASSIGNEE OF GLASS MOUNTAIN ASSIGNEE OF
BANK OF AMERICA

No. 2008-1358-CD

C/O Mann Bracken LLC
4660 TRINDLE ROAD, Ste 300
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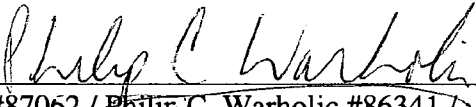
VS.

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HOUTZDALE PA 16651

Defendant(s)

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and Eskanos & Adler, P.C.
4660 Trindle Road, Suite 300, Camp Hill, PA 17011
Telephone: (717) 303-6700
Counsel for Plaintiff

I hereby certify this to be a true
and attested copy of the original
statement filed in this case.

JUL 24 2008

Attest.


Prothonotary/
Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

INDEPENDENCE RECEIVABLES CORPORATION
ASSIGNEE OF GLASS MOUNTAIN
ASSIGNEE OF BANK OF AMERICA
Plaintiff

vs.

JENNIFER HANSEL-MECKLEY
Defendant(s)

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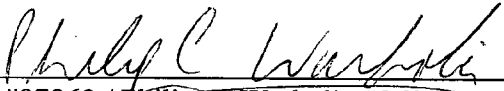
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Date:

7/14/08



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Date: 7/16/08



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.FICHINFO1 .. Date 10/04/07 Account 4429 Mode L ..Nxt + .
ACCOUNT# 4429 CLIENT# 001978 ACCT BALANCE \$1,935.01
PYMT DT 09/23/04
OPEN DT 10/07/03
HRG OFF DT 05/14/05
PURCHASE DT 09/29/07
CC2-DEBT-NAME *CC2-DEBT-SALUT*CC2-DEBT-ALIAS
ANSEL-MECKLEY,JENNIFER
CC2-DEBT-ADDR *CC2-DEBT-CITY-ST *CC2-DEBT-ZIP*CC2-DEBT-PHONE
50 ELIZABETH STREET HOUTZDALE, PA 16651 0000000000
CC2-DEBT-FAX*CC2-DEBT-SSN *CC2-RFILE-NR*CC2-DEBT-DOB*CC2-DEBT-DRIVERS-LIC
XXX-XX-7205
CC-REC-TYPE*CC-FILENO *CC-FORW-FILE *CC-MASCO-FILE *CC-FORW-ID
1 0300188030 4429 MD16 INDP
CC-FIRM-ID*CC1-DATE-FORW*CC1-LIST-FORW*CC1-COMM*CC1-SUIT-FEE*CC1-ORIG-AMT-OUT
LLP 10/03/07 \$.00 \$1,935.01
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CC1-CRED-ZIP*CC1-BAL-AMT-OUT*CC1-TYPE*CC1-LPAY-DATE*CC1-LPAY-AMT-OUT
00000C0193501 09/23/04 \$.00

•MODE L=LFT R=RGH W=WRP Next File •

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104452
NO: 08-1358-CD
SERVICES 1
COMPLAINT

PLAINTIFF: INDEPENDENCE RECEIVABLES CORPORATION Assignee of Glass Mountain
Assignee
vs.
DEFENDANT: JENNIFER HANSEL-MECKLEY

5
FILED
013:31301
DEC 23 2008
William A. Shaw

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	MANN	003079	10.00
SHERIFF HAWKINS	MANN	003079	35.48

Sworn to Before Me This

_____ Day of _____ 2008

So Answers,



Chester A. Hawkins
Sheriff

FILED

DEC 23 2008

William A. Shaw
Prothonotary/Clerk of Courts

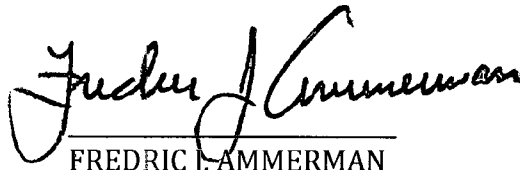
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

INDEPENDENCE RECEIVABLES CORPORATION, *	NO. 2008-1358-CD
et al,	
Plaintiffs *	
vs. *	
JENNIFER HANSEL-MECKLEY *	
Defendant *	

ORDER

NOW, this 25th day of June, 2013, upon the Court's review of the docket and noting no activity for a period of over four years, it is the ORDER of this Court that the case be moved to inactive status. The Prothonotary shall code the case in Full Court as Z-INACTA.

BY THE COURT,



FREDRIC J. AMMERMAN
President Judge

NOCC
019:10cm
Z JUN 23 2013 6K
William A. Shaw
Prothonotary/Clerk of Courts