

08-1394-CD  
Target Nat'l Bank vs Clorise M Eles

FILED

JUL 30 2008

W/11:45(wm)  
William A. Shaw  
Prothonotary/Clerk of Courts

1 Cent to Shaw

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TARGET NATIONAL BANK

Plaintiff

v.

CLORISE M ELES

Defendant(s)

NO. 2008-1394-CD

**COMPLAINT IN CIVIL  
ACTION**

Filed on behalf of:  
TARGET NATIONAL BANK

Counsel of Record for This Party:

Gregg L. Morris, Esquire  
Pa I.D. #69006

Patenaude & Felix, A.P.C.  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TARGET NATIONAL BANK

Plaintiff

v.

CLORISE M ELES

Defendant(s)

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**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.

Usted ha sido demandado en corte. Si usted desea defenderse de las demandas que se presentan mas adelante en las siguientes paginas, debe tomar accion dentro de los proximos veinte (20) dias despues de la notificacion de esta Demanda y Aviso radicando personalmente o por medio de un abogado una comparecencia escrita y radicando en la Corte por escrito sus defensas de, y objeciones a, las demandas presentadas aqui en contra suya. Se le advierte de que si usted fall de tomar accion como se describe anteriormente, el caso pude proceder sin usted y un fallo por cualquier suma de dinero reclamada en la demanda o cualquier reclamacion o remedio solicitado por el demandante puede ser dictado en contra suya por la Corte sin mas aviso adicional. Usted puede perder dinero o propiedad au otros derechos importantes para usted.

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

USTED DEBE LLEVAR ESTE DOCUMENTO A SU ABOGADO INMEDIATAMENTE. SI USTED NO TIENE UN ABOGADO, LLAME O VAYA A LA SIGUENTE OFICINA. ESTA OFICINA PUEDE PROVEERLE INFORMACION A CERCA DE COMO CONSEGUIR UN ABOGADO

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.

SI USTED NO PUEDE PAGAR POR LOS SERVICIOS DE UN ABOGADO, ES POSSIBLE QUE ESTA OFICINA LE PUEDA PROVEER INFORMACION SOBRE AGENCIAS QUE OFREZCAN SERVICIOS LEGALES SIN CARGO O BAJO COSO A PERSONAS QUE CALIFICAN.

CLEARFIELD COUNTY COURTHOUSE  
DAVID S. MEHOLICK, COURT  
ADMINISTRATOR  
230 EAST MARKET STREET  
CLEARFIELD, PA 16830  
814-765-2641

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

TARGET NATIONAL BANK

Plaintiff

v.

CLORISE M ELES

Defendant(s)

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**COMPLAINT IN CIVIL ACTION**

AND NOW, comes Plaintiff, TARGET NATIONAL BANK , by and through its attorney, GREGG MORRIS, ESQUIRE and the law offices of PATENAUDE & FELIX, A.P.C. and files the following **Complaint in Civil Action**, and in support thereof aver as follows:

1. Plaintiff, TARGET NATIONAL BANK , is a corporation and for the purpose of this litigation, maintaining a place of business c/o PATENAUDE AND FELIX, A.P.C., 213 East Main St Carnegie, Pennsylvania 15106.

2. Defendant is CLORISE M ELES, an adult individual, believed to currently reside at 53 SHILOH RD WOODLAND, PA 16881.

3. Heretofore, the Defendant(s) opened a account with Plaintiff being Account No. 4352375040997134, for the purchase of good and services.

4. The Defendant(s) has/have made or authorized a number of purchases and as of June 21, 2007, Defendant(s) owes \$5,584.97 on said account plus interest at 12.90 %.

5. Plaintiff maintains accurate books of account recording all credits and debits for this account.

6. The Defendant(s) have/has received monthly billing statements from Plaintiff setting forth the nature and amount of all charges made by Defendant(s), and the transactions between Plaintiff and Defendant(s) give rise to an account stated, upon which Plaintiff has relied.

7. The Defendant(s) made payments, but have/has refused to pay, and now refuses to pay the balance due and owing on the aforesaid account in the sum of \$5,584.97, plus interest and costs.

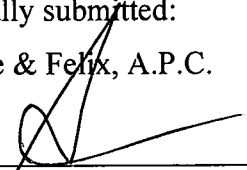
8. By failing to object or dispute the statements, Defendant(s) have/has assented to and agreed to the correctness of the balance due on the credit card account so as to constitute and account stated.

9. Despite repeated demands, Defendant(s) have/has failed to make the required installment payments when due and therefore the full amount of the account is now due and payable.

**WHEREFORE**, Plaintiff demands Judgment in its favor, and against Defendant(s), in the amount of \$5,584.97, plus interest as set forth herein from the date of breach, with continuing interest at the legal rate thereon from the date of Judgment plus costs. The damages requested are less than the maximum amount for compulsory arbitration as set by the Court.

Respectfully submitted:  
Patenaude & Felix, A.P.C.

Date: June 09, 2008



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Gregg L. Morris, Esquire  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675



\*00000\*

**Account Number: 4352-3750-4099-7134**  
**CLORISE M ELES,**

Statement Closing Date: **January 23, 2008**  
 Page 1 of 1

### Target Visa Credit Card Account Summary

Total Credit Limit \$0  
 Cash Limit \$0  
 Available Credit \$0  
 Portion Available for Cash \$0

The Cash Limit is a portion of the Total Credit Limit

### Questions? Call Us:

Target Credit Services 1-888-755-5856  
 TDD/TDY 1-800-347-5842  
 Outside the U.S. 11-612-307-8622 (Call Collect)

Calling will not preserve your billing-error rights

Previous Balance \$5,584.97  
 Payments & Credits 0.00  
 Purchases & Advances 0.00  
 Other Charges 0.00  
**FINANCE CHARGES 0.00**

**New Balance \$5,584.97**

**Amount Past Due \$5,584.97**

**Minimum Payment Due \$5,584.97**  
**(includes any Amount Past Due)**

**Payment Due Date February 17, 2008**

### Payments & Credits

No payments or credits were received last month.

### Finance Charges

Days in Billing Period: 33

Balance Type	Daily Periodic Rate	Corresponding Annual Percentage Rate	Average Daily Balance	Periodic <b>FINANCE CHARGE</b>	Transaction <b>FINANCE CHARGE</b>
Purchases	0.00000%	0.00%	\$0.00	<b>\$0.00</b>	<b>\$0.00</b>
Cash	0.00000%	0.00%	\$0.00	<b>\$0.00</b>	<b>\$0.00</b>

**Total FINANCE CHARGES: \$0.00**

**Actual ANNUAL PERCENTAGE RATE: 0.00%**

There is a minimum **FINANCE CHARGE** of **\$1.00** for any billing period in which a Finance Charge is imposed.

Target National Bank, an affiliate of Target Stores

NOTICE: SEE REVERSE SIDE FOR IMPORTANT INFORMATION



INCLUDE THIS PORTION WITH YOUR PAYMENT MADE PAYABLE TO TARGET NATIONAL BANK



Account Number **4352-3750-4099-7134**  
 New Balance **\$5,584.97**  
 Minimum Payment Due **\$5,584.97**  
 Payment Due Date **February 17, 2008**

NEW PHONE, HOME OR  
 E-MAIL ADDRESS?  
 PLEASE UPDATE ON  
 REVERSE SIDE.



**TARGET NATIONAL BANK**  
**P.O. BOX 59317**  
**MINNEAPOLIS, MN 55459-0317**

Amount  
 Enclosed

\$

### OFFICE COPY

STATEMENT PAGE NOT PRINTED

CLORISE M ELES  
 STE 404  
 53 SHILOH RD  
 WOODLAND, PA 16881-8225



3001400558497055849790435237504099713471

In \_\_\_\_\_ Court

\_\_\_\_\_ Judicial (Circuit/District)

Original Creditor Name: TARGET NATIONAL BANK

Debtor Name: ELES, CLORISE M

Co-Debtor Name:

Account Number: 4352375040997134

AFFIDAVIT OF ACCOUNT

STATE OF MINNESOTA  
COUNTY OF HENNEPIN

ss:

The undersigned, ADAM GRIM states that:

1. I am a representative of TARGET NATIONAL BANK and am authorized to Verify current balances due and owing to TARGET NATIONAL BANK on credit card accounts.
2. As of the date of this affidavit I have reviewed the records of the above listed person and account, and that the amount due and owing to TARGET NATIONAL BANK on this account, over and above all known legal set offs is \$5584.97.
3. That reasonable inquiry has been made to determine if the defendant is in the military service of the United States of America, and to the best of my knowledge that defendant is not in such military service and is therefore not entitled to the rights and privileges provided under the Soldiers and Sailors Civil Relief Act of 1940, as amended.

That the above information is true to the best of my knowledge,  
information and belief, and based upon the books and business  
records of TARGET NATIONAL BANK.

  
Authorized Agent of TARGET NATIONAL BANK

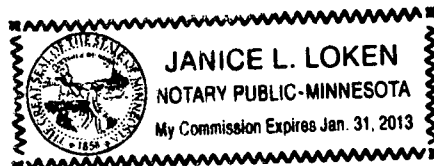
Subscribed and sworn to before  
Me on 19th day of February, 2008

  
Notary Public

My commission expires: 1/31/13

4352375040997134

A144 PATENAUDE & FELIX, A.P.C





The undersigned does hereby verify subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities, that he is, ADAM GRIM, Assistant Secretary, of Target National Bank, Plaintiff Herein, that he 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 knowledge, information and belief.

A handwritten signature in black ink, appearing to read 'Adam Grim', is written over a horizontal line.

ADAM GRIM  
Authorized Agent of Target National Bank/Target Visa

4352375040997134  
A144  
PATENAUE & FELIX, A.P.C

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-1394-CD

TARGET NATIONAL BANK  
vs  
CLORISE M. ELES

SERVICE # 1 OF 1

COMPLAINT

SERVE BY: 08/29/2008 HEARING: PAGE: 104473

DEFENDANT: CLORISE M. ELES  
ADDRESS: 53 SHILOH RD  
WOODLAND, PA 16881

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT OCCUPIED William A. Shaw Prothonotary/Clerk of Courts

ATTEMPTS

**SHERIFF'S RETURN**

NOW, THIS SUNDAY OF AUG 25 2008 AT 11:12 AM / PM **SERVED** THE WITHIN

COMPLAINT ON CLORISE M. ELES, DEFENDANT

BY HANDING TO CLORISE M ELES, D.F.

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

ADDRESS SERVED 53 Shiloh Rd Woodland.

NOW \_\_\_\_\_ AT \_\_\_\_\_ AM / PM **POSTED** THE WITHIN

COMPLAINT FOR CLORISE M. ELES

AT (ADDRESS) \_\_\_\_\_

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

I MAKE RETURN OF **NOT FOUND** AS TO CLORISE M. ELES

REASON UNABLE TO LOCATE \_\_\_\_\_

SWORN TO BEFORE ME THIS

\_\_\_\_\_ DAY OF \_\_\_\_\_ 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY: Deputy George F. DeHaven  
Deputy Signature

Deputy George F. DeHaven  
Print Deputy Name

**FILED**  
013:32651  
AUG 05 2008  
William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104473  
NO: 08-1394-CD  
SERVICES 1  
COMPLAINT

PLAINTIFF: TARGET NATIONAL BANK  
vs.  
DEFENDANT: CLORISE M. ELES

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	PATENAUDE	23303	10.00
SHERIFF HAWKINS	PATENAUDE	23303	23.85

5  
FILED

0/2:30pm  
DEC 26 2008

William A. Shaw  
Prothonotary/Clerk of Courts

Sworn to Before Me This

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

So Answers,



Chester A. Hawkins  
Sheriff

FILED

F<sub>2</sub>

JAN 16 2009

M/12.20/0

William A. Shaw

Prothonotary/Clerk of Courts

1 Cert to/Notice  
TO DEPT.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TARGET NATIONAL BANK

Plaintiff

v.

CLORISE M ELES

Defendant(s)

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NO. 2008-1394-CD

**PRAECIPE FOR DEFAULT  
JUDGMENT**

Filed on behalf of:  
TARGET NATIONAL BANK

Counsel of Record for This Party:

Gregg L. Morris, Esquire  
Pa I.D. #69006

Patenaude & Felix, A.P.C.  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TARGET NATIONAL BANK

Plaintiff

v.

CLORISE M ELES

Defendant(s)

NO. 2008-1394-CD

**PLAINTIFF'S PRAECIPE FOR DEFAULT JUDGMENT**

TO: PROTHONOTARY

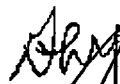
Please enter a judgment against the defendant, above named, for failure to file an Answer to Plaintiff's complaint.

Amount claimed in Complaint	\$5,584.97
Interest from June 21, 2007	\$0.00
Less payments received	\$0.00
Attorney's fees	\$0.00
<b>TOTAL</b>	<b>\$5,584.97</b>

With continuing interest on the principal amount of \$5,584.97, with interest at the legal rate, plus costs of suit.

I hereby certify that a written notice of intention to file this praecipe was mailed to the defendants and defendants' counsel (if known), after the default had occurred and at least ten (10) days prior to the date of the filing of this praecipe. A copy of the Notice is attached.

Respectfully submitted:  
Patenaude & Felix, A.P.C.



Date: January 12, 2009

\_\_\_\_\_  
Gregg L. Morris, Esquire  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TARGET NATIONAL BANK

Plaintiff

v.

CLORISE M ELES

Defendant(s)

NO. 2008-1394-CD

**PLAINTIFF'S AFFIDAVIT OF NON-MILITARY SERVICE AND MAILING OF  
NOTICE PURSUANT TO PA.R.C.P. 1037(b)**

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF CLEARFIELD

SS.

Before me, the undersigned authority, a Notary Public in and for said County and State, personally appeared GREGG MORRIS, attorney for and authorized representative of Plaintiff, who being duly sworn according to law, deposes and states that the defendant(s), CLORISE M ELES, is not in the military service of the United States of America to the best of his knowledge, information and belief and certifies that Notice of Intent to take Default Judgment was mailed in accordance with Pa.R.C.P.237.1, as evidenced by the attached copy.

Respectfully submitted:

Patenaude & Felix, A.P.C.

Date: January 12, 2009

Gregg L. Morris, Esquire  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675

Sworn to and subscribed before me this

12 day of Jan., 2009.

Notary Public

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal  
Carolyn J. Stewart, Notary Public  
Carnegie Boro, Allegheny County  
My Commission Expires Aug. 14, 2011

Member, Pennsylvania Association of Notaries

# TARGET NATIONAL BANK

NO. 2008-1394-CD

CLORISE M ELES

## IMPORTANT NOTICE

Filed on behalf of:  
TARGET NATIONAL BANK

Counsel of Record for This Party:

Gregg L. Morris, Esquire  
Pa I.D. #69006

Patenaude & Felix, A.P.C.  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TARGET NATIONAL BANK

Plaintiff

v.

CLORISE M ELES

Defendant(s)

NO. 2008-1394-CD

To: CLORISE M ELES  
53 SHILOH RD  
WOODLAND PA 16881

Date of Notice: December 31, 2008

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 NOTICE TO A 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.

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

Respectfully submitted  
Patenaude & Felix, A.P.C.

**/s/**

Date: December 31, 2008


Gregg L. Morris, Esquire  
215 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675



I, GREGG MORRIS, attorney for Plaintiff, TARGET NATIONAL BANK , hereby certify that a true and correct copy of foregoing document was served this date by ordinary mail upon the following:

Clorise M. Eles  
53 Shiloh Rd  
Woodland PA 16881

Date: December 31, 2008



/s/  
\_\_\_\_\_  
Gregg L. Morris, Esquire  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TARGET NATIONAL BANK

Plaintiff

v.

CLORISE M ELES

Defendant(s)

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NO. 2008-1394-CD

**NOTICE OF ORDER, DECREE  
OR JUDGMENT**

Filed on behalf of:  
TARGET NATIONAL BANK

Counsel of Record for This Party:

Gregg L. Morris, Esquire  
Pa I.D. #69006

Patenaude & Felix, A.P.C.  
213 E. Main Street  
Carnegie, PA 15106  
(412) 429-7675

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

TARGET NATIONAL BANK

Plaintiff

v.

CLORISE M ELES

Defendant(s)

NO. 2008-1394-CD

**NOTICE OF ORDER, DECREE OR JUDGMENT**  
**AGAINST CLORISE M ELES ONLY**

TO: ( ) Plaintiff ( x ) Defendant ( ) Garnishee ( ) Additional Defendant

You are hereby notified that the following Order, Decree, or Judgment has been entered against you on Jan. 16, 2009.

- ( ) Decree Nisi in Equity  
( ) Final Decree in Equity  
( X ) Judgment of ( ) Confession ( ) Verdict ( ) Court Order  
( X ) Default ( ) Non-suit  
( ) Non-Pros ( ) Arbitration Award

- ( X ) Judgment in the amount of \$5,584.97, plus costs.  
( ) District Justice Transcript of Judgment in the amount of \$ \_\_\_\_\_, plus costs.  
( ) If not satisfied within sixty (60) days, your motor vehicle operator's license will be suspended by the Department of Transportation.

Prothonotary

By 

~~Deputy~~

If you have questions concerning the above, please Contact:

Name of Attorney: GREGG MORRIS, Esquire  
213 East Main St  
Carnegie PA 15106  
(412)-429-7675