

08-1798-CD
GE Money Bank vs Gary Crago

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
NO: 08-1798-CD

GE MONEY BANK Issuer of the GE Flex Plus Credit Card
vs
GARY CRAGO

SERVICE # 1 OF 1

COMPLAINT

SERVE BY: 10/14/2009

HEARING:

PAGE: 106181

DEFENDANT: GARY CRAGO

ADDRESS: 640 SUE ST
HOUTZDALE, PA 16651

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT Notary/Clerk of Court OCCUPIED

ATTEMPTS

9-18-09 - 10:50 AM
Lives in Philipsburg
Area

FILED

92.25cm
SEP 30 2009

UT

William A. Shaw

VACANT Notary/Clerk of Court OCCUPIED

SHERIFF'S RETURN

NOW, 9-30-09 AT 11:04 AM / PM SERVED THE WITHIN

COMPLAINT ON GARY CRAGO, DEFENDANT

BY HANDING TO Reg. Kline Mother-in-law

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

ADDRESS SERVED 57 Pleasant Hill Road
Philipsburg, Pa.

NOW _____ AT _____ AM / PM POSTED THE WITHIN

COMPLAINT FOR GARY CRAGO

AT (ADDRESS) _____

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

I MAKE RETURN OF **NOT FOUND** AS TO GARY CRAGO

REASON UNABLE TO LOCATE _____

SWORN TO BEFORE ME THIS

DAY OF _____ 2009

So Answers: CHESTER A. HAWKINS SHERIFF

BY: James C. Davis
Deputy Signature

James C. Davis
Print Deputy Name

IN THE COURT OF COMMON PLEAS OF CLEARFIELD

COUNTY, PENNSYLVANIA

GE MONEY BANK

ISSUER OF THE GE FLEX PLUS CREDIT CARD
 c/o Mann Bracken LLC
 4660 Trindle Road, 3rd Floor
 Camp Hill, PA 17011

Plaintiff

VS.

GARY CRAGO
 57 OLD ROUTE 322
 PHILIPSBURG PA 16866

NO. 08-1798-CJ
 Type of Case: Contract
 Type of Pleading: Civil Complaint
 Filed on behalf of: Plaintiff

Defendant(s)

Date: 9/12/08Philip C Warholic

Amy F. Doyle #87062 / Philip C. Warholic #86341
 David R. Galloway #87326 / Sarah E. Ehasz #86469
 Robert N. Polas, Jr. #201259
 Mann Bracken LLC / Counsel for Plaintiff
 The Successor by Merger to Wolpoff & Abramson, LLP
 and Eskanos & Adler, P. C.
 4660 Trindle Road, Suite 300, Camp Hill, PA 17011
 Telephone: (717) 303-6700 Fax: (717) 737-9051
 Telephone: (717) 303-6700
 Counsel for Plaintiff

9/14/08 Document
 Reinstated/Reissued to Sheriff/Attorney
 for service.

William A. Shaw
 Deputy Prothonotary

March 18, 2009 Document
 Reinstated/Reissued to Sheriff/Attorney
 for service.

William A. Shaw 6K
 Deputy Prothonotary

FILED Atty pd.
9/12/2008 \$95.00
 SEP 22 2008 ICC Sheriff
 (1) William A. Shaw ICC Atty
 Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

GE MONEY BANK : NO.
ISSUER OF THE GE FLEX PLUS CREDIT CARD :
4125 WINDWARD PLAZA DRIVE :
BUILDING 300 :
ALPHARETTA GA 30005 :
Plaintiff :
VS. : CIVIL ACTION - LAW
GARY CRAGO :
57 OLD ROUTE 322 :
PHILIPSBURG PA 16866 :
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.

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PA Lawyer Referral Service
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

GE MONEY BANK	:	NO.
ISSUER OF THE GE FLEX PLUS CREDIT CARD	:	
4125 WINDWARD PLAZA DRIVE	:	
BUILDING 300	:	
ALPHARETTA GA 30005	:	
Plaintiff	:	
VS.	:	CIVIL ACTION - LAW
GARY CRAGO	:	
57 OLD ROUTE 322	:	
PHILIPSBURG PA 16866	:	
Defendant(s)	:	

NOTICIA

Le han demandado a usted en la corte. Si usted quiere defensas de esas demandas expuestas en las páginas, siguientes, usted tiene veinte (20) días de plazo al partir de la fecha de la demanda y la notificación. Usted debe presentar una apariencia escrita o en persona o por abogado y archivar en la corte en forma escrita sus defensas o sus objeciones a las demandas en corta de su persona. Sea avisado que si usted no se defiende, la corte tomará medidas y pedido entrar una orden contra usted sin previo aviso o notificación y por cualquier queja o alivio que es pedido en la petición de demanda. Usted puede perder dinero o sus propiedades o otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFFICIENTE DE PAGAR TAL SERVICIO VAYA EN PERSONA O LLAME POR TELÉFONO A LA OFICINA CUYA DIRECCIÓN SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

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 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

GE MONEY BANK : NO.
ISSUER OF THE GE FLEX PLUS CREDIT CARD :
4125 WINDWARD PLAZA DRIVE :
BUILDING 300 :
ALPHARETTA GA 30005 :
Plaintiff :
VS. : CIVIL ACTION - LAW
GARY CRAGO :
57 OLD ROUTE 322 :
PHILIPSBURG PA 16866 :
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, GE MONEY BANK

ISSUER OF THE GE FLEX PLUS CREDIT CARD

located at, 4125 WINDWARD PLAZA DRIVE
BUILDING 300
ALPHARETTA GA 30005

2. Defendants, GARY CRAGO
is/are adult individual(s) with last known address(es) of

57 OLD ROUTE 322
PHILIPSBURG PA 16866

COUNTY OF CLEARFIELD

3. It is averred that Defendant(s) was/were issued an open end credit card account.

4. At all relevant times material hereto, Defendant(s) has/have used said charge card for the purchase of products, goods, and/or for obtaining services.

5. Defendant(s) was/were provided with copies of the Statement of Account showing all debits and credits for transactions on the aforementioned credit card account to which there was no bona fide objection by Defendant(s). 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(s) and/or any authorized users in the sum of \$ 20998.80.

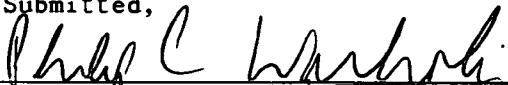
7. Despite reasonable and repeated demands for payment, Defendant(s) has/have refused and continues to refuse to pay all sums due and owing on the aforementioned account balance, all to the damage and detriment of the Plaintiff.

8. Any and all conditions precedent to the bringing of this action have been performed by Plaintiff.

9. The amount in controversy exceeds 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 \$ 20998.80, plus costs of this action, and any other relief as this Court deems just and reasonable.

Respectfully Submitted,


Amy F. Doyle #87062 / Philip C. Warholic #86341

David R. Galloway #87326 / Sarah E. Ehasz #86469

Robert N. Polas, Jr. #201259

MANN BRACKEN LLC / Counsel for Plaintiff

The Successor by Merger to Wolpoff & Abramson, LLP

and Eskanos & Adler, P. C.

4660 Trindle Road, Suite 300, Camp Hill, PA 17011 / (717) 303-6700

VERIFICATION

The undersigned hereby states that he/she is 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, he/she is authorized to take this verification on behalf of said Plaintiff in the within action and verifies that the statements made in the foregoing Complaint are true and correct to the best of his/her 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.



Amy F. Doyle #87062 / Phillip C. Warholic #86341

David R. Galloway #87326 / Sarah E. Ehasz #86469

Robert N. Polas, Jr. #201259

Mann Bracken LLC / Counsel for Plaintiff

The Successor by Merger to Wolpoff & Abramson, LLP
and Eskanos & Adler, P. C.

4660 Trindle Road, Suite 300, Camp Hill, PA 17011

Telephone: (717) 303-6700 Fax: (717) 737-9051

EXHIBIT "A"

File Number 180571191 Media Number 08050001581 Account Number [REDACTED] 5663
PROVIDER CREDITOR:GE MONEY BANK RETAILER:GE FLEX

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
NO: 08-1798-CD

GE MONEY BANK
vs
GARY CRAGO

SERVICE # 1 OF 1

COMPLAINT

SERVE BY: 10/22/2008

HEARING:

PAGE: 104700

FILED
01/3/2009
NOV 04 2008

DEFENDANT: GARY CRAGO
ADDRESS: 57 OLD RT. 322
PHILIPSBURG, PA 16866

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT OCCUPIED

ATTEMPTS

10/1/08 8pm n/t EXPIRED

William A. Shaw
Prothonotary/Clerk of Courts

SHERIFF'S RETURN

NOW, _____ AT _____ AM / PM SERVED THE WITHIN

COMPLAINT ON GARY CRAGO, 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 GARY CRAGO

AT (ADDRESS) _____

NOW This 4th day Nov 2008 AT 3:14 AM / PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF NOT FOUND AS TO GARY CRAGO

REASON UNABLE TO LOCATE TIME Expired

SWORN TO BEFORE ME THIS

____ DAY OF _____ 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY: George F. Detham Deputy Signature

George F. Detham
Print Deputy Name

IN THE COURT OF COMMON PLEAS OF CLEARFIELD

COUNTY, PENNSYLVANIA

GE MONEY BANK

ISSUER OF THE GE FLEX PLUS CREDIT CARD
c/o Mann Bracken LLC
4660 Trindle Road, 3rd Floor
Camp Hill, PA 17011

Plaintiff

VS.

GARY CRAGO
57 OLD ROUTE 322
PHILIPSBURG PA 16866

: NO. 08-1798-CD

: Type of Case: Contract

: Type of Pleading: Civil Complaint

: Filed on behalf of: Plaintiff

Defendant(s)

Date: 9/12/08*Philip C Warholic*

Amy F. Doyle #87062 / Philip C. Warholic #86341
David R. Galloway #87326 / Sarah E. Ehasz #86469
Robert N. Polas, Jr. #201259
Mann Bracken LLC / Counsel for Plaintiff
The Successor by Merger to Wolpoff & Abramson, LLP
and Eskanos & Adler, P. C.
4660 Trindle Road, Suite 300, Camp Hill, PA 17011
Telephone: (717) 303-6700 Fax: (717) 737-9051
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.

SEP 22 2008

Attest.

William L. Brown
Prothonotary/
Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

GE MONEY BANK : NO.
ISSUER OF THE GE FLEX PLUS CREDIT CARD :
4125 WINDWARD PLAZA DRIVE :
BUILDING 300 :
ALPHARETTA GA 30005 :
Plaintiff :
VS. : CIVIL ACTION - LAW
GARY CRAGO :
57 OLD ROUTE 322 :
PHILIPSBURG PA 16866 :
Defendant(s) :

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PA Lawyer Referral Service
Clearfield County Courthouse
David S. Meholic, Court Administrator
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814-765-2641

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

GE MONEY BANK : NO.
ISSUER OF THE GE FLEX PLUS CREDIT CARD :
4125 WINDWARD PLAZA DRIVE :
BUILDING 300 :
ALPHARETTA GA 30005 :
Plaintiff :
VS. : CIVIL ACTION - LAW
GARY CRAGO :
57 OLD ROUTE 322 :
PHILIPSBURG PA 16866 :
Defendant(s) :

NOTICIA

Le han demandado a used en la corte. Si used querer defensas de esas demandas expuestas en las paginas, siguientes, used tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificación. used debe presentar una apariencia escrita o en persona o por abogado y archivar en la corte en forma escrita sus defensas o sus objeciones a las demandas en corta de su persona. Sea avisado que si used no se defienda, la corte tomara medidas y pedido entrar una orden contra used sin previo aviso o notificación y por cualquier queja o alivio que es pedido en la petición de demanda. used puede perder dinero o sus propiedades o otros derechos importantes para used.

LLEVE ESTA DEMANDA A UN ABOGADO IMMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFFICIENTE DE PAGAR TAL SERVICIO VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASSITANCIA LEGAL.

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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

GE MONEY BANK : NO.
ISSUER OF THE GE FLEX PLUS CREDIT CARD :
4125 WINDWARD PLAZA DRIVE :
BUILDING 300 :
ALPHARETTA GA 30005 :
Plaintiff :
VS. : CIVIL ACTION - LAW
GARY CRAGO :
57 OLD ROUTE 322 :
PHILIPSBURG PA 16866 :
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, GE MONEY BANK

ISSUER OF THE GE FLEX PLUS CREDIT CARD

located at, 4125 WINDWARD PLAZA DRIVE
BUILDING 300
ALPHARETTA GA 30005

2. Defendants, GARY CRAGO
is/are adult individual(s) with last known address(es) of

57 OLD ROUTE 322
PHILIPSBURG PA 16866

COUNTY OF CLEARFIELD

3. It is averred that Defendant(s) was/were issued an open end credit card account.

4. At all relevant times material hereto, Defendant(s) has/have used said charge card for the purchase of products, goods, and/or for obtaining services.

5. Defendant(s) was/were provided with copies of the Statement of Account showing all debits and credits for transactions on the aforementioned credit card account to which there was no bona fide objection by Defendant(s). 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(s) and/or any authorized users in the sum of \$ 20998.80.

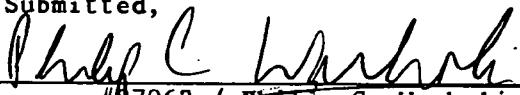
7. Despite reasonable and repeated demands for payment, Defendant(s) has/have refused and continues to refuse to pay all sums due and owing on the aforementioned account balance, all to the damage and detriment of the Plaintiff.

8. Any and all conditions precedent to the bringing of this action have been performed by Plaintiff.

9. The amount in controversy exceeds 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 \$ 20998.80, plus costs of this action, and any other relief as this Court deems just and reasonable.

Respectfully Submitted,


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

VERIFICATION

The undersigned hereby states that he/she is 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, he/she is authorized to take this verification on behalf of said Plaintiff in the within action and verifies that the statements made in the foregoing Complaint are true and correct to the best of his/her 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.

Philip C. Warholic

Amy F. Doyle #87062 / ~~Philip C. Warholic~~ #86341
David R. Galloway #87326 / Sarah E. Ehasz #86469
Robert N. Polas, Jr. #201259
Mann Bracken LLC / Counsel for Plaintiff
The Successor by Merger to Wolpoff & Abramson, LLP
and Eskanos & Adler, P. C.
4660 Trindle Road, Suite 300, Camp Hill, PA 17011
Telephone: (717) 303-6700 Fax: (717) 737-9051

EXHIBIT "A"

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104700
NO: 08-1798-CD
SERVICES 1
COMPLAINT

PLAINTIFF: GE MONEY BANK
VS.
DEFENDANT: GARY CRAGO

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	MANN	00058929	10.00
SHERIFF HAWKINS	MANN	00058929	33.14

FILED

013:30pm
JAN 15 2008

5 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

GE MONEY BANK : No. 08-1798-CD 1798
 ISSUER OF THE GE FLEX PLUS :
 CREDIT CARD :
 4125 WINDWARD PLAZA DRIVE :
 BUILDING 300 :
 ALPHARETTA, GA 30005 :
 Plaintiff :
 vs. : CIVIL ACTION - LAW
 GARY CRAGO :
 Defendant(s) :

PRAECIPE TO REINSTATE

To the Prothonotary:

Kindly reinstate the complaint in the above-referenced matter.

Respectfully submitted,


 David R. Galloway #87326/Philip C. Warholic #86341
 Sarah E. Ehasz #86469/Robert N. Polas, Jr. #201259
 Amy F. Doyle #87062
 Mann Bracken LLP / Counsel for Plaintiff
 The Successor by Merger to Wolpoff & Abramson, LLP
 and Eskanos & Adler, P. C.
 4660 Trindle Road, Suite 300, Camp Hill, PA 17011
 Telephone: (717) 303-6700 Fax: (717) 737-9051

Date: 3/11/09

FILED Atty pd. 7.00
 MAR 18 2009 11:42 AM
 ICC/Compl. *610*
 S William A. Shaw
 Prothonotary/Clerk of Courts *Reinstated*
 to Sheriff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD

COUNTY, PENNSYLVANIA

GE MONEY BANK

ISSUER OF THE GE FLEX PLUS CREDIT CARD
c/o Mann Bracken LLC
4660 Trindle Road, 3rd Floor
Camp Hill, PA 17011
Plaintiff

VS.

GARY CRAGO
57 OLD ROUTE 322
PHILIPSBURG PA 16866

Defendant(s)

Date: 9/12/08

Philip C. Warholic
Amy F. Doyle #87062 / Philip C. Warholic #86341
David R. Galloway #87326 / Sarah E. Ehasz #86469
Robert N. Polas, Jr. #201259
Mann Bracken LLC / Counsel for Plaintiff
The Successor by Merger to Wolpoff & Abramson, LLP
and Eskanos & Adler, P. C.
4660 Trindle Road, Suite 300, Camp Hill, PA 17011
Telephone: (717) 303-6700 Fax: (717) 737-9051
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.

SEP 22 2008

Attest.

William A. Coughlin
Prothonotary/
Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD

COUNTY, PENNSYLVANIA

GE MONEY BANK	:	NO.
ISSUER OF THE GE FLEX PLUS CREDIT CARD	:	
4125 WINDWARD PLAZA DRIVE BUILDING 300 ALPHARETTA GA 30005 Plaintiff	:	
VS.	:	CIVIL ACTION - LAW
GARY CRAGO	:	
57 OLD ROUTE 322 PHILIPSBURG PA 16866	:	
Defendant(s)	:	

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David S. Meholic, Court Administrator
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814-765-2641

IN THE COURT OF COMMON PLEAS OF CLEARFIELD

COUNTY, PENNSYLVANIA

GE MONEY BANK : NO.

ISSUER OF THE GE FLEX PLUS CREDIT CARD :

4125 WINDWARD PLAZA DRIVE :

BUILDING 300 :

ALPHARETTA GA 30005 :

Plaintiff :

CIVIL ACTION - LAW

VS. :

GARY CRAGO :

57 OLD ROUTE 322 :

PHILIPSBURG PA 16866 :

Defendant(s)

NOTICIA

Le han demandado a used en la corte. Si used quarete defensas de esas demandas expuestas en las paginas, siguientes, used tiene viente (20) dias de plazo al partir de la fecha de la demanda y la notificación. Used debe presentar una apariencia escrita o en persona o por abogado y archivar en la corte en forma escrita sus defensas o sus objeciones a las demandas en corte de su persona. Sea avisado que si used no se defienda, la corte tomara medidas y pedido entrar una orden contra used sin previo aviso o notificación y por cualquier queja o alivio que es pedido en la petición de demanda. Used puede perder dinero o sus propiedades o otros derechos importantes para used.

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

PA 16830

IN THE COURT OF COMMON PLEAS OF CLEARFIELD

COUNTY, PENNSYLVANIA

GE MONEY BANK : NO.
ISSUER OF THE GE FLEX PLUS CREDIT CARD :
4125 WINDWARD PLAZA DRIVE :
BUILDING 300 :
ALPHARETTA GA 30005 :
Plaintiff :
VS. : CIVIL ACTION - LAW
GARY CRAGO :
57 OLD ROUTE 322 :
PHILIPSBURG PA 16866 :
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, GE MONEY BANK
ISSUER OF THE GE FLEX PLUS CREDIT CARD
located at, 4125 WINDWARD PLAZA DRIVE
BUILDING 300
ALPHARETTA GA 30005

2. Defendants, GARY CRAGO
is/are adult individual(s) with last known address(es) of
57 OLD ROUTE 322
PHILIPSBURG PA 16866

COUNTY OF CLEARFIELD

3. It is averred that Defendant(s) was/were issued an open end credit card account.

4. At all relevant times material hereto, Defendant(s) has/have used said charge card for the purchase of products, goods, and/or for obtaining services.

5. Defendant(s) was/were provided with copies of the Statement of Account showing all debits and credits for transactions on the aforementioned credit card account to which there was no bona fide objection by Defendant(s). 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(s) and/or any authorized users in the sum of \$ 20998.80.

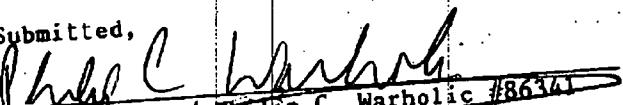
7. Despite reasonable and repeated demands for payment, Defendant(s) has/have refused and continues to refuse to pay all sums due and owing on the aforementioned account balance, all to the damage and detriment of the Plaintiff.

8. Any and all conditions precedent to the bringing of this action have been performed by Plaintiff.

9. The amount in controversy exceeds 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 \$ 20998.80, plus costs of this action, and any other relief as this Court deems just and reasonable.

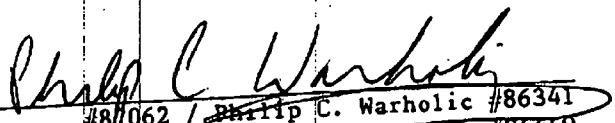
Respectfully Submitted,


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

VERIFICATION

The undersigned hereby states that he/she is 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, he/she is authorized to take this verification on behalf of said Plaintiff in the within action and verifies that the statements made in the foregoing Complaint are true and correct to the best of his/her 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.


Phillip C. Warholic

Amy F. Doyle #87062 / Phillip C. Warholic #86341
David R. Galloway #87326 / Sarah E. Ehasz #86469
Robert N. Polas, Jr. #201259
Mann Bracken LLC / Counsel for Plaintiff
The Successor by Merger to Wolpoff & Abramson, LLP
and Eskanos & Adler, P. C.
4660 Trindle Road, Suite 300, Camp Hill, PA 17011
Telephone: (717) 303-6700 Fax: (717) 737-9051

1340

EXHIBIT "A"

File Number 180571111 PROVIDER CREDITOR: GE MUNICIPAL

8050001381 GE MONEY BANK (RETAILER: GE FLEX)

CLIENT NO 002015 GENG	ACCT# 5663	LST PAY DATE 07/18/07
CUR BAL ----- \$20,958.80	CHG OFF AMT \$18,401.59	
CHG OFF DATE 02/08/08	LAST INT DATE	
INT RATE ----- 2.299	ACCT STATUS -- LCD	
CHG OFF RSN -- CADA	GARY	
***** PRIMARY DEBTOR	FIRST NAME -	
LAST NAME -- CRAGO	SSN /TRX ID - XXX-XX-2663	
DOB ----- 01/28/52	WORK INFORMATION	
***** HOME INFORMATION	WORK PHONE# -(706) 500-0000	
HOME PHONE# - (104) 800-0000	EMPLOYER -----	
HOME ADDR1 - 57 OLD ROUTE 322	EMP ADDR	
ADDR2	COUNTY -----	
CITY/ST PHILLIPSBURG PA	SEQ NO ----- 00	
RECORD-TYPE-A	LENDING OFC-FLX001	
LOAN TYPE--CHAC	CHG OFF RSN-CADA	
RECOVERER CODE-M9NL	RECEIPT DATE-02/12/08	
SOURCE ID-----A	ACC INTRST--\$2,597.21	
COST--S.00	DEALER CODE--	

880

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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

GE MONEY BANK : No. 08-17898-CD 1798
 ISSUER OF THE GE FLEX PLUS :
 CREDIT CARD :
 4125 WINDWARD PLAZA DRIVE :
 BUILDING 300 :
 ALPHARETTA, GA 30005 :
 Plaintiff :
 vs. : CIVIL ACTION - LAW
 GARY CRAGO :
 Defendant(s) :

PRAECIPE TO REINSTATE

To the Prothonotary:

Kindly reinstate the complaint in the above-referenced matter.

Respectfully submitted,

Amy Doyle
 David R. Galloway #87326/Philip C. Warholic #86341
 Sarah E. Ehasz #86469/Robert N. Polas, Jr. #201259
 Amy F. Doyle #87062
 Mann Bracken LLP / Counsel for Plaintiff
 Attorneys in the Practice of Debt Collection
 4660 Trindle Road, Suite 300, Camp Hill, PA 17011
 Telephone: 866-253-0128 Fax: (717) 737-9051

Date: 9/1/09

5 FILED Atty Pd. 7.00
 M124231 SEP 14 2009
 ICC 1
 William A. Shaw
 Prothonotary/Clerk of Courts
 Comp.
 Reinstated
 to Sheriff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

GE MONEY BANK : NO. 08-1798-CD

ISSUER OF THE GE FLEX PLUS CREDIT CARD :

4125 WINDWARD PLAZA DRIVE : CIVIL ACTION - LAW

BUILDING 300

ALPHARETTA GA 30005

Plaintiff

vs.

GARY CRAGO

Defendant(s)

PRAECIPE FOR JUDGMENT

FILED
 11/13/09 20.00
 DEC 11 2009 ICC & Notice
 William A. Shaw
 Prothonotary/Clerk of Courts
 to Def.
 ICC to Atty

Please enter Judgment in favor of Plaintiff and against Defendant(s),
 GARY CRAGO and ,
 for failure to answer the Complaint.

(X) Amount due \$ 20998.80
 TOTAL \$ 20998.80 , plus costs and statutory
 interest from the date of Judgment.

(X) I certify that the foregoing assessment of damages is for specified amounts alleged to be due in the complaint and is calculable as a sum certain from the complaint.

(X) Pursuant to Pa.R.C.P. 237 (Notice of Praeclipe for final judgment or decree), I certify that a copy of this praecipe has been mailed to each other party who has appeared in the action or to his/her Attorney of Record.

(X) Pursuant to Pa.R.C.P. 237.1, I certify that written notice of the intention to file this praecipe was mailed or delivered to the party against whom judgment is to be entered and to his/her Attorney of Record, if any, after the default occurred and at least ten days prior to the date of the filing of this praecipe and a copy of the notice is attached.

DATE: 12/3/09Signature: 

David R. Galloway #87326 Philip C. Warholic #86341
 Amy F. Doyle #87062/Robert N. Polas, Jr. #201259
 Mann Bracken LLP / Counsel for Plaintiff
 Attorneys in the Practice of Debt Collection
 4660 Trindle Road, Suite 300, Camp Hill, PA 17011
 Telephone: 866-253-0128 Fax: (717) 737-9051

NOW, December 11, 2009, JUDGMENT IS ENTERED AS ABOVE


 Prothonotary/Clerk, Civil Division

By: _____
 Deputy

5341
REGIONAL OFFICES

PHOENIX, AZ
AGOURA HILLS, CA
CONCORD, CA
GREENWOOD VILLAGE, CO
WILMINGTON, DE
BOCA RATON, FL
ATLANTA, GA
ROCKVILLE, MD
NOVI, MI
CHAMPLIN, MN
HUNTERSVILLE, NC
LAS VEGAS, NV
ROCHESTER, NY

LAW OFFICES
MANN BRACKEN LLP
Attorneys in the Practice of Debt Collection
(A National Collection Attorney Network Firm)
TWO IRVINGTON CENTRE
702 KING FARM BLVD.
ROCKVILLE, MD 20850-5775

(TOLL FREE)
1-866-255-9685

PLEASE DIRECT CORRESPONDENCE TO ROCKVILLE OFFICE

REGIONAL OFFICES
INDEPENDENCE, OH
PORTLAND, OR
CAMP HILL, PA
PITTSBURGH, PA
CLINTON, TN
NASHVILLE, TN
HOUSTON, TX
IRVING, TX
SAN ANTONIO, TX
FAIRFAX, VA
RICHMOND, VA
VIRGINIA BEACH, VA

Hours of operation:
8 a.m. 9 p.m. EST M-F

11/09/09

180571191
GARY CRAGO

940 SUE ST
HOUTZDALE PA 16651-1744

File No. 180571191

Re: CREDITOR:GE MONEY BANK RETAILER:GE FLEX PLUS CREDIT CARD
vs. GARY CRAGO
Docket No. 08-1798-CD

Dear GARY CRAGO

Enclosed herein please find a 10-Day Notice pursuant to Rule 237.1 of the Pennsylvania Rules of Civil Procedure.

Sincerely,



David R. Galloway #87326/Philip C. Warholic #86341
Sarah E. Ehasz #86469/Robert N. Polas, Jr. #201259
Amy F. Doyle #87062
Mann Bracken LLP / Counsel for Plaintiff
Attorneys in the Practice of Debt Collection
4660 Trindle Road, Suite 300, Camp Hill, PA 17011
Telephone: 866-253-0128 Fax: (717) 737-9051

Enclosure

CC: HAROLD SCHEPTLY

This is an attempt by a debt collector to collect a debt and any information obtained will be used for that purpose.

NOT10D/PANOTC

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

GE MONEY BANK : NO. 08-1798-CD

ISSUER OF THE GE FLEX PLUS CREDIT CARD :

4125 WINDWARD PLAZA DRIVE :
BUILDING 300
ALPHARETTA GA 30005 :Plaintiff :
vs.GARY CRAGO :
Defendant(s) :

TO: GARY CRAGO

940 SUE ST
HOUTZDALE PA 16651-1744

DATE OF NOTICE: 11/09/09

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 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.

PA Lawyer Referral Service
Clearfield County Courthouse
David S. Meholic, Court Administrator
230 East Market Street
Clearfield PA 16830



By

David R. Galloway #87326/Philip C. Warholic #86341
 Sarah E. Ehasz #86469/Robert N. Polas, Jr. #201259
 Amy F. Doyle #87062
 Mann Bracken LLP / Counsel for Plaintiff
 Attorneys in the Practice of Debt Collection
 4660 Trindle Road, Suite 300, Camp Hill, PA 17011
 Telephone: 866-253-0128 Fax: (717) 737-9051

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

GE MONEY BANK : No. 08-1798-CD
ISSUER OF THE GE FLEX PLUS CREDIT CARD :
4125 WINDWARD PLAZA DRIVE : CIVIL ACTION - LAW
BUILDING 300 :
ALPHARETTA GA 30005 :
Plaintiff :
vs. :
GARY CRAGO :
Defendant(s) :

CERTIFICATE OF RESIDENCE
PA. R.C.P. 236

I hereby certify that the precise residence of Plaintiff is:

GE MONEY BANK
ISSUER OF THE GE FLEX PLUS CREDIT CARD
4125 WINDWARD PLAZA DRIVE
BUILDING 300
ALPHARETTA GA 30005

and certify that the last known address of the within Defendant(s) is:

GARY CRAGO
940 SUE ST
HOUTZDALE PA 16651-1744



David R. Galloway #87326/Philip C. Warholic #86341
Amy F. Doyle #87062/Robert N. Polas, Jr. #201259
Mann Bracken LLP / Counsel for Plaintiff
Attorneys in the Practice of Debt Collection
4660 Trindle Road, Suite 300, Camp Hill, PA 17011
Telephone: 866-253-0128 Fax: (717) 737-9051

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

GE MONEY BANK : NO. 08-1798-CD
Plaintiff :
vs. : CIVIL ACTION - LAW
GARY CRAGO :
Defendant(s) :

NOTICE OF JUDGMENT

(x) Notice is hereby given that a Judgment in the above-captioned matter has been entered against you in the amount of \$ 20998.80, on December 11, 2009, plus costs and statutory interest from the date of Judgment.

(x) A copy of all documents filed with the Prothonotary in support of the within judgment is/are attached.

By: Willie Bracken

If you have any questions regarding this Notice, please contact the filing party.

David R. Galloway #87326/Philip C. Warholic #86341
Amy F. Doyle #87062/Robert N. Polas, Jr. #201259
Mann Bracken LLP / Counsel for Plaintiff
Attorneys in the Practice of Debt Collection
4660 Trindle Road, Suite 300, Camp Hill, PA 17011
Telephone: 866-253-0128 Fax: (717) 737-9051

(This Notice is given in accordance with Pa.R.C.P. 236.)

NOTICE SENT TO:

GARY CRAGO
940 SUE ST
HOUTZDALE PA 16651-1744

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 106181
NO. 08-1798-CD
SERVICES 1
COMPLAINT

PLAINTIFF: GE MONEY BANK Issuer of the GE Flex Plus Credit Card
vs.
DEFENDANT: GARY CRAGO

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	MANN	00399161	10.00
SHERIFF HAWKINS	MANN	00399161	46.40

FILED
1/25/2010
FEB 26 2010
William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

So Answers,

Day of _____ 2010



Chester A. Hawkins
Sheriff