

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: ~~040 SUE ST~~
HOUTZDALE, PA 16651

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT Notary/Clerk of Court

ATTEMPTS

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

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 E. Davis

Deputy Signature

JAMES E. DAVIS

Print Deputy Name

OLD RT 322
Go Past ADLERS MKT
Past Road on left to
Development, next
house (ReO) on left.

FILED

92.25 cm
4 SEP 30 2009

William A. Shaw

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 Warholi
 Amy F. Doyle #87062 / Philip C. Warholi #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 GK
 Deputy Prothonotary

FILED Any pd.
 M 12/12/08 \$95.00
 SEP 22 2008 ICC Sheriff
 William A. Shaw
 Prothonotary/Clerk of Courts ICC Atty

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. Meholick, 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 paginas, siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Usted debe presentar una apariciencia 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 usted no se defiende, la corte tomara medidas y podria entrar una orden contra usted sin previo aviso o notificacion y por cualquier queja o alivio que es pedido en la peticion 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 SUFICIENTE 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 ASISTENCIA 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.

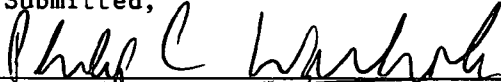
7. Despite reasonable and repeated demands for payment, Defendant(s) has/have refused and continues to refuse to pay all sums due and owing on the aforementioned account balance, all to the damage and detriment of the Plaintiff.

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,

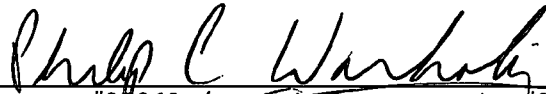


Amy F. Doyle #87062 / Philip C. Warholick #86341
 David R. Galloway #87326 / Sarah E. Ehasz #86469
 Robert N. Polas, Jr. #201259
 MANN BRACKEN LLC / Counsel for Plaintiff
 The Successor by Merger to Wolpoff & Abramson, LLP
 and Eskanos & Adler, P. C.
 4660 Trindle Road, Suite 300, Camp Hill, PA 17011 / (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 / Philip C. Warholik #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
NO: 08-1798-CD

GE MONEY BANK
vs
GARY CRAGO

SERVICE # 1 OF 1

COMPLAINT

SERVE BY: 10/22/2008

HEARING:

PAGE: 104700

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 R/W N/H EXPIRED

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 3:16 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. DeHaven
Deputy Signature

George F. DeHaven
Print Deputy Name

FILED
013:31/67
NOV 04 2008
William A. Shaw
Prothonotary/Clerk of Courts

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. Warholick
Amy F. Doyle #87062 / *Philip C. Warholick* #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
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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. 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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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

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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) :

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.

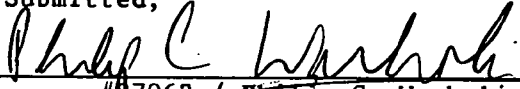
7. Despite reasonable and repeated demands for payment, Defendant(s) has/have refused and continues to refuse to pay all sums due and owing on the aforementioned account balance, all to the damage and detriment of the Plaintiff.

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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,

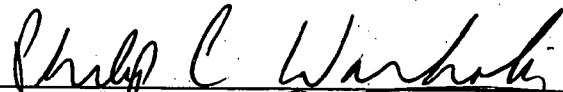


Amy F. Doyle #87062 / Philip C. Warhol #86341
David R. Galloway #87326 / Sarah E. Ehasz #86469
Robert N. Polas, Jr. #201259
MANN BRACKEN LLC / Counsel for Plaintiff
The Successor by Merger to Wolpoff & Abramson, LLP
and Eskanos & Adler, P. C.
4660 Trindle Road, Suite 300, Camp Hill, PA 17011 / (717)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

VERIFICATION

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Amy F. Doyle #81062 / Philip C. Warholik #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

0/3:30pm
JAN 15 2009

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

_____ Day of _____ 2008

So Answers,



Chester A. Hawkins
Sheriff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

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

Plaintiff

vs.

GARY CRAGO

Defendant(s)

No. 08-¹⁷⁹⁸~~17898~~-CD


CIVIL ACTION - LAW

PRAECIPE TO REINSTATE

To the Prothonotary:

Kindly reinstate the complaint in the above-referenced matter.

Respectfully submitted,


 David R. Galloway #87326/Philip C. Warholc #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

MAR 18 2009

William A. Shaw
 Prothonotary/Clerk of Courts

Atty pd. 7.00
 ICCA/Compl.
 Reinstated
 to Sheriff
 @

IN THE COURT OF COMMON PLEAS OF CLEARFIELD

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:

4/12/08

Philip C. Warholick
Amy F. Doyle #87062 / Philip C. Warholick #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

COUNTY, PENNSYLVANIA

NO. 08-1798-CD

Type of Case: Contract
Type of Pleading: Civil Complaint
Filed on behalf of: 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. Brown
Prothonotary/
Clerk of Courts

Cover - Clearfield
PACVRK/PACVR FILE # 180571191

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. Meholick, 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

:

CIVIL ACTION - LAW

VS.

:

GARY CRAGO

:

57 OLD ROUTE 322
PHILIPSBURG PA 16866

:

:

Defendant(s)

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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

:

:

:

CIVIL ACTION - LAW

VS.

:

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.

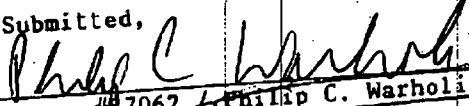
7. Despite reasonable and repeated demands for payment, Defendant(s) has/have refused and continues to refuse to pay all sums due and owing on the aforementioned account balance, all to the damage and detriment of the Plaintiff.

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

David R. Galloway

Robert N. Polas, Jr.

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.

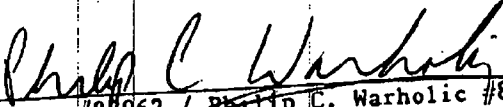

Amy F. Doyle #87062 / Philip C. Warholik #86341
David R. Galloway #87326 / Sarah E. Ehasz #86469
Robert N. Polas, Jr. #201259
Mann Bracken LLC / Counsel for Plaintiff
The Successor by Merger to Wolpoff & Abramson, LLP
and Eskanos & Adler, P. C.
4660 Trindle Road, Suite 300, Camp Hill, PA 17011
Telephone: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

```

CLIENT NO 002015 GENG ACCT# ██████████ 5663
CUR BAL ----- $20,998.80
CHG OFF DATE - 02/08/08
INT RATE ---- 2299
CHG OFF RSN -- CADA
***** PRIMARY DEBTOR *****
LAST NAME -- CRAGO
DOB ----- 01/28/52
== == HOME INFORMATION == ==
HOME PHONE#-(304) 800-0000
HOME ADDR1 - 57 OLD ROUTE 322
ADDR2
CITY/ST PHILIPSBURG PA 16866-8245
RECORD-TYPE-A
LOAN TYPE---CHAC
RECOVERER CODE--W9NL
SOURCE ID----A
ASSOC COST---$00

LST PAY DATE - 07/18/07
CHG OFF AMT - $18,401.59
LAST INT DATE -
ACCT STATUS -- LCD

FIRST NAME - GARY
SSN /TAX ID - XXX-XX-2663
== == WORK INFORMATION ==
WORK PHONE#-(706) 500-0000
EMPLOYER ---
EMP ADDR
COUNTY -----
SEQ NO-----00
LENDING OFC--FLX001
CHG OFF RSN--CADA
RECEIPT DATE-02/12/08
ACC INTEREST--$2,597.21

```

---\$20,998.80

COMMENT DATE-

[illegible]

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

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

Plaintiff

vs.

GARY CRAGO

Defendant(s)

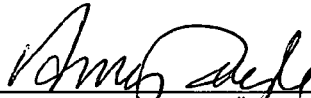
: No. 08-¹⁷⁹⁸~~17898~~-CD
 :
 :
 :
 :
 :
 : CIVIL ACTION - LAW
 :
 :

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
 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:

9/9/09

5 FILED
 3:12:42 PM
 SEP 14 2009
 William A. Shaw
 Prothonotary/Clerk of Courts
 Any pd. 7.00
 ICC-01
 Compl.
 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

DEC 11 2009

William A. Shaw
Prothonotary/Clerk of Courts

Att. Ad. 20.00
 ICC & Notice
 to Def.
 ICC to Att.

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 Praecipe 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: 12/3/09

Signature:

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. Warholc #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. Meholick, 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) :

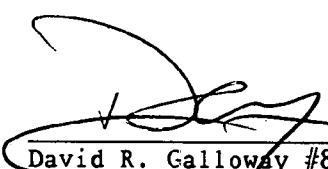
CERTIFICATE OF RESIDENCE
 PA. R.C.P. 236

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: William L. Galloway

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

David R. Galloway #87326/Philip C. Warholc #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
0/2:50m
FEB 26 2010
William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

_____ Day of _____ 2010

So Answers,



Chester A. Hawkins
Sheriff