

08-2125-CD

Citibank vs Mary E. Dixon

5 FILED  
M 2:43 P.M. GK  
NOV 07 2008 NO CC  
William A. Shaw  
Prothonotary/Clerk of Courts  
1 COMPL. E.H.F.F.  
ATTY PAID 95.00

Burton Neil & Associates, P.C.  
By: Neil Sarker, Esquire ID. NO. 203465  
1060 Andrew Drive, Suite 170  
West Chester, PA 19380  
(610) 696-2120  
Attorney for Plaintiff

CITIBANK (SOUTH DAKOTA), N.A. : IN THE COURT OF COMMON PLEAS  
701 East 60th Street N  
Sioux Falls, SD 57117

Plaintiff : CLEARFIELD COUNTY, PENNSYLVANIA

v.

MARY E DIXON : NO. 2008 - 2125 - CD  
357 Keystone Hill Road  
Philipsburg PA 16866-8303  
Defendant : CIVIL ACTION - LAW

### Complaint - 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 (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claim 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.

**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 LEGAL 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.**

### LAWYER REFERENCE AND INFORMATION SERVICE

David S. Meholick  
Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
Telephone No. 814-765-2641 Ext. 5982

Burton Neil & Associates, P.C.  
By: Neil Sarker, Esquire ID. NO. 203465  
1060 Andrew Drive, Suite 170  
West Chester, PA 19380  
(610) 696-2120

Attorney for Plaintiff

CITIBANK (SOUTH DAKOTA), N.A.  
701 East 60th Street N  
Sioux Falls, SD 57117

: IN THE COURT OF COMMON PLEAS

Plaintiff : CLEARFIELD COUNTY, PENNSYLVANIA

v.

: NO.

MARY E DIXON  
357 Keystone Hill Road  
Philipsburg PA 16866-8303

Defendant : CIVIL ACTION - LAW

### Complaint

1. Plaintiff is Citibank (South Dakota), N.A., with place of business located at 701 East 60th Street North, Sioux Falls, South Dakota.

2. Defendant is Mary E Dixon, who resides at 357 Keystone Hill Road, Philipsburg, Clearfield County, Pennsylvania.

3. Plaintiff is a national banking association, engaged in various types of banking business including consumer lending through the issuance of credit cards.

4. Plaintiff furnished consumer credit to the defendant by means of a(n) AT&T Universal credit card with account number ending in 2509 hereinafter referred to as the credit card account.

5. Plaintiff kept accurate running records of all debits and credits to the account.

6. Plaintiff mailed to defendant monthly statements for the account including the billing statement attached hereto as Exhibit A. The monthly statements accurately stated the previous balance, the debits and credits to the account for the prior billing period.

7. Before plaintiff mailed Exhibit A, defendant had for many months made payments on

account of the billing statement or retained the statement without payment.

8. Defendant's actions as set forth above constituted an account stated between parties for the sum of \$11,286.36 which sum reflects the Exhibit A statement balance less credits, if any, which were applied subsequent to the date of Exhibit A.

Wherefore, plaintiff demands judgment against defendant for the sum of \$11,286.36, and the costs of this action.

Burton Neil & Associates, P.C.

By: \_\_\_\_\_



Neil Sarker, Esquire  
Attorney for Plaintiff

The law firm of Burton Neil & Associates, P.C. is a debt collector.



# AT&T Universal Card

Page 1 of 4

## AT&T Universal Platinum Card

Charter Member  
MARY E DIXON  
Account XXXXXXXXXX 2509  
Calling Card + PIN  
November 27 - December 27, 2007

### How To Reach Us

Visit: [www.universalcard.com](http://www.universalcard.com)  
Customer Service: 1-800-423-4343 or write  
Cardmember Services, PO Box 44167  
Jacksonville, FL 32231-4167

### Quick Reference

Minimum Payment Due..... \$11,286.36  
Due Date..... January 21, 2008  
\*Payment must be received by 5:00 pm local time on the payment due date.  
Amount Past Due..... \$2,068.50  
Amount Over Limit..... \$2,186.36  
Credit Line..... \$9,100.00  
Available Credit..... \$0.00  
Cash Advance Limit..... \$1,000.00  
Available Cash Advance Limit..... \$0.00

Your late fee was based on your account balance as of the payment due date (12/21/07), which was \$10,955.69.

Help is available! Please call the toll-free number shown above to learn about our special payment options. Please give us the opportunity to assist you.

*C-16484*

### Account Summary

Previous Balance	10,955.69
Payments and Adjustments	0.00
MasterCard® Activity	330.67
Total AT&T Services	0.00
New Balance	\$11,286.36

Note: Detailed activity starts on page 3.

date paid      amount paid      check #



AT&T and the AT&T globe design are trademarks of AT&T Knowledge Ventures, licensed to Citigroup Inc.

Please follow payment instructions outlined in the "Important Instructions for Making Payments" section of the statement.



Your Account Number

XXXXXXXXXX 2509

Payment Due Date

JAN 21 2008

Your Total Balance

\$11286.36

Minimum Amount Due

\$11286.36

Please Enter Amount of Payment Enclosed

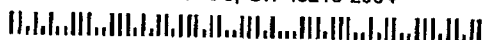
\$

2945 MC 32 A 1 AR7152006



MARY E DIXON  
357 KEYSTONE HILL RD  
PHILIPSBURG PA 16866-8303

AT&T UNIVERSAL CARD  
P.O. BOX 18256  
COLUMBUS, OH 43218-2564



EXHIBIT

*A*

MARY E DIXON  
Account 2509  
November 27 - December 27, 2007

## AT&T Universal Card

Page 2 of 4

In the return envelope, please:

- 1 Make your check payable to AT&T Universal Card.**
- 2 Enclose your check or money order.** Include your account number and name on the front of your check or money order. Please, no cash or foreign currency.
- 3 Enclose your payment coupon.** Do not staple or tape it to your payment. Insert the payment coupon so that the entire AT&T Universal Card address appears through the window of your remittance envelope.

MARY E DIXON  
 Account 2509  
 November 27 - December 27, 2007

# AT&T Universal Card

Page 3 of 4

## AT&T UNIVERSAL MASTERCARD ACTIVITY

Purchases..... 279.12  
 Cash Advances and Checks..... 12.55  
 Fees..... 39.00  
 Total MasterCard Activity..... **\$330.67**

### PURCHASES

Total MasterCard Purchases..... **\$279.12**

#### Standard Purch

Trans	Post	Description	Amount
	12/27	PURCHASES*FINANCE CHARGE*PERIOD	88.02
Total Standard Purch			<b>\$88.02</b>

#### Balance Transfer - Charged To Offer 4

Trans	Post	Description	Amount
	12/27	PURCHASES*FINANCE CHARGE*PERIOD	122.98
Total Balance Transfer - Charged To Offer 4			<b>\$122.98</b>

#### Balance Transfer - Charged To Offer 5

Trans	Post	Description	Amount
	12/27	PURCHASES*FINANCE CHARGE*PERIOD	68.12
Total Balance Transfer - Charged To Offer 5			<b>\$68.12</b>

### CASH ADVANCES

Cash Advance Limit..... \$1,000.00\* \*This represents a portion of your total credit line.

Total Cash Advances..... **\$12.55**

#### Standard Adv

Trans	Post	Description	Amount
	12/27	ADVANCES*FINANCE CHARGE*PERIOD	12.55
Total Standard Adv			<b>\$12.55</b>

### FINANCE CHARGE INFORMATION

	Nominal APR	Periodic Rate	Days In Billing Period	x	Balance Subject to Finance Charge	=	Periodic FINANCE CHARGE	+	Transaction Fee/FINANCE CHARGE	ANNUAL PERCENTAGE RATE
<b>PURCHASES</b>										
Standard Purch	31.980%	.08762%(D)	x 30	x	\$3,348.64	=	\$88.02	+	\$0.00	31.980%
Offer 4	31.980%	.08762%(D)	x 30	x	\$4,678.45	=	\$122.98	+	\$0.00	31.980%
Offer 5	31.980%	.08762%(D)	x 30	x	\$2,591.51	=	\$68.12	+	\$0.00	31.980%
<b>CASH ADVANCES</b>										
Standard Adv	31.980%	.08762%(D)	x 30	x	\$477.43	=	\$12.55	+	\$0.00	31.980%

Total FINANCE CHARGE = **\$291.67**

### FEES

#### Standard Purch

Trans	Post	Description	Amount
	12/27	LATE FEE - NOV PAYMENT PAST DUE	39.00
Total Fees			<b>\$39.00</b>

MARY E DIXON  
Account [REDACTED] 2509  
November 27 - December 27, 2007

## AT&T Universal Card

Page 4 of 4

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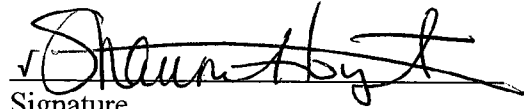
### AT&T SERVICES SUMMARY

AT&T Universal Calling Card Calls..... \$0.00

### Verification

Shauna Houghton

I, \_\_\_\_\_ am an employee of Citicorp Credit Services, Inc., (USA) which is by contract the service provider for plaintiff CITIBANK (SOUTH DAKOTA), N.A. retained to perform services on its behalf. I am authorized to make this verification as attorney-in-fact for plaintiff under powers of attorney from plaintiff to Citicorp Credit Services, Inc. (USA) and to me. The foregoing averments of fact in the within pleading are true and correct to the best of my knowledge, information and belief. I understand that the statements made herein are subject to the penalties of 18 Pa. C.S. Section 4904, relating to unsworn falsification to the authorities.

  
Signature

**C-16484**

Mary E Dixon

Account number ending in 2509

1000

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-2125-CD

CITIBANK (SOUTH DAKOTA), N.A.

vs

MARY E. DIXON

SERVICE # 1 OF 1

COMPLAINT

SERVE BY: 12/07/2008

HEARING:

PAGE: 104891

DEFENDANT:

MARY E. DIXON

ADDRESS:

357 KEYSTONE HILL ROAD

PHILIPSBURG, PA 16866-8303

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

OCCUPIED

ATTEMPTS

12/2/08  
12-3-08 *hp*

**SHERIFF'S RETURN**

NOW, 12/4/08 AT 957 AM PM SERVED THE WITHIN

COMPLAINT ON MARY E. DIXON, DEFENDANT

BY HANDING TO

Mary Dixon, self

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

ADDRESS SERVED

357 Keystone Hill rd Philpsburg Pa

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

COMPLAINT FOR MARY E. DIXON

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

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

I MAKE RETURN OF NOT FOUND AS TO MARY E. DIXON

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

SWORN TO BEFORE ME THIS

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

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

*[Signature]*  
Deputy Signature  
S. Hawkins

Print Deputy Name

5  
**FILED**  
08:30 a.m. GK  
DEC 16 2008  
William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104891  
NO: 08-2125-CD  
SERVICES 1  
COMPLAINT

PLAINTIFF: CITIBANK (SOUTH DAKOTA), N.A.  
vs.  
DEFENDANT: MARY E. DIXON

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	NEIL	047884	10.00
SHERIFF HAWKINS	NEIL	047884	74.16

5  
**FILED**  
01/31/2008  
FEB 20 2008  
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

CITIBANK (SOUTH DAKOTA), N.A.  
701 East 60th Street N  
Sioux Falls, SD 57117

Plaintiff(s)

v.

MARY E DIXON  
357 Keystone Hill Road  
Philipsburg PA 16866-8303

Defendant(s)

CIVIL DIVISION, ARBITRATION  
AND STATUTORY APPEALS ONLY

CASE NO. 2008-02125-CD

TYPE OF PLEADING:

**Praecepte for Default Judgment**

CODE AND CLASSIFICATION:

FILED ON BEHALF OF: Plaintiff

CITIBANK (SOUTH DAKOTA), N.A.

(Name of Party, indicate plaintiff or defendant)

NAME, ADDRESS AND TELEPHONE OF:

X

Counsel of Record

Individual, if pro se

Neil Sarker, Esquire

Burton Neil & Associates, P.C.

1060 Andrew Drive, Suite 170

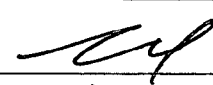
West Chester, PA 19380

Telephone: 610-696-2120

email: [litigation@burt-law.com](mailto:litigation@burt-law.com)

Attorney's State ID# 203465

Attorney's Firm ID# \_\_\_\_\_

  
\_\_\_\_\_  
(Signature)

**FILED** Any pd. 20.00  
m 11:35 (21)  
FEB 23 2009 ICC Notice  
to Def.

William A. Shaw  
Prothonotary/Clerk of Courts

(CW)

CITIBANK (SOUTH DAKOTA), N.A.  
701 East 60th Street N, Sioux Falls, SD 57117  
Plaintiff

: IN THE COURT OF COMMON PLEAS  
: CLEARFIELD COUNTY, PENNSYLVANIA

v.

: NO. 2008-02125-CD

MARY E DIXON  
357 Keystone Hill Road  
Philipsburg PA 16866-8303  
Defendant

: CIVIL ACTION - LAW

**Praeceptum for Default Judgment**

To the Prothonotary:

Please enter judgment by default for want of an answer in the above case in favor of the plaintiff and against the defendant, and assess damages as follows:

Principal:	\$11,286.36
TOTAL	\$11,286.36

Understanding that false statements herein made are subject to penalty under 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities, I verify that:

1. The above are the precise last-known addresses of the judgment debtor and creditor.
2. The annexed notice of intention to file this praecipe was mailed to all parties against whom judgment is to be entered and to their record attorneys, if any, after the default occurred, and at least ten days prior to the date of the filing of this praecipe.
3. Pursuant to Section 201(b)(1)(A) of the Servicemembers Civil Relief Act of 2003 (SCRA), the defendant is not in the military service of the United States based on information received from the defendant and/or the Department of Defense website.

**JUDGMENT BY DEFAULT ENTERED  
AND DAMAGES ASSESSED AS ABOVE.  
NOTICE GIVEN UNDER PA.R.CIV.P. 236**

\_\_\_\_\_  
Pro Prothonotary

Burton Neil & Associates, P.C.

By: \_\_\_\_\_

Neil Sarker, Esquire  
Attorney for Plaintiff  
I.D. NO. 203465  
1060 Andrew Drive, Suite 170  
West Chester, PA 19380

The law firm of Burton Neil & Associates is a debt collector.

C-16484

CITIBANK (SOUTH DAKOTA), N.A.

: IN THE COURT OF COMMON PLEAS

Plaintiff

: CLEARFIELD COUNTY, PENNSYLVANIA

v.

: NO. 2008-02125-CD

MARY E DIXON

Defendant

: CIVIL ACTION - LAW

**Notice of Intention to File Praecept for Default Judgment**

TO: Mary E Dixon  
357 Keystone Hill Road  
Philipsburg PA 16866-8303

**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 (10) 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 your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the following office to find out where you can get legal 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.

**LAWYER REFERENCE AND  
INFORMATION SERVICE**

David S. Meholick  
Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
Telephone No. 814-765-2641 Ext. 5982

DATE OF NOTICE: February 3, 2009

Burton Neil & Associates, P.C.

By:   
Neil Sarker, Esquire  
Attorney for Plaintiff  
Identification No. 203465  
1060 Andrew Drive, Suite 170  
West Chester, PA 19380  
(610) 696-2120

In making this communication, we advise our office is a  
debt collector.

Burton Neil & Associates, P.C.  
By: Neil Sarker, Esquire ID. NO. 203465  
1060 Andrew Drive, Suite 170  
West Chester, PA 19380  
610-696-2120

Attorney for Plaintiff

CITIBANK (SOUTH DAKOTA), N.A.

Plaintiff

v.

MARY E DIXON

Defendant

: IN THE COURT OF COMMON PLEAS

: CLEARFIELD COUNTY, PENNSYLVANIA

: NO. 2008-02125-CD

: CIVIL ACTION - LAW

**Rule of Civil Procedure NO. 236 (Revised)**

Notice is given that a JUDGMENT in the above captioned matter has been entered  
against you on February 23, 2009.

Prothonotary

By: William L. Sarker

Deputy

If you have any questions concerning the above, please contact:

Neil Sarker, Esquire  
Attorney for Party Filing  
1060 Andrew Drive, Suite 170  
West Chester, PA 19380  
Phone: 610-696-2120

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COPY