

08-2300-CD
Federated Fin Corp vs Frank Story

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

FEDERATED FINANCIAL CORPORATION OF AMERICA

Plaintiff

No. 08-2300-CD

vs.

COMPLAINT IN CIVIL ACTION

FRANK L STORY

Defendant

FILED ON BEHALF OF
Plaintiff

COUNSEL OF RECORD OF
THIS PARTY:

James C. Warmbrodt,
P.A.I.D.# 42524
Weltman, Weinberg & Reis Co., L.P.A.
436 Seventh Avenue, Suite 1400
Pittsburgh, PA 15219
(412)434-7955
Fax: 412-338-7130

WWR#6959365

S
FILED Atty. ad.
M 12:04 PM 95.00
DEC 01 2008
(11) ICC Sheriff
William A. Shaw
Prothonotary/Clerk of Courts

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

FEDERATED FINANCIAL CORPORATION OF AMERICA

Plaintiff

vs.

Civil Action No.

FRANK L STORY

Defendant

COMPLAINT IN CIVIL ACTION AND 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.

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

COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
SECOND & MARKET STREETS
CLEARFIELD, PA 16830
(814) 765-2641, ext. 50-51

COMPLAINT

1. Plaintiff is a corporation having offices in 30955 NORTHWESTERN HWY FARMINGTON HILLS, MI 48334-0000.
2. Defendant is an adult individual residing at 115 21ST ST CLEARFIELD, PA 16830.
3. Defendant applied for and received a credit card issued by Advanta bearing the account number 1316.
4. Contract was subsequent assigned to plaintiff.
5. Defendant made use of said credit card and has currently a balance due and owing to Plaintiff, as of OCTOBER 27 2008, in the amount of \$29,828.18.
6. Defendant is in default of the terms of the cardholder Agreement having not made monthly payments to Plaintiff thereby rendering the entire balance immediately due and payable. A true and correct copy of the Statement of Account is attached hereto, marked as Exhibit "1" and made a part hereof.
7. Plaintiff avers that the Cardholder Agreement between the parties provides that Plaintiff is entitled to the addition of finance charges at the rate of 30.64% per annum on the unpaid balance.
8. Although repeatedly requested to do so by Plaintiff, Defendant has willfully failed and/or refused to pay the principal balance, finance charges or any part thereof to Plaintiff.

VERIFICATION

The undersigned does hereby verify subject to the penalties of 18 PA.C.S. §4904 relating to unsworn falsifications to authorities, that he/she is John L. Flees
(Name)
VP of Port Svc's of Federated Financial Corp of Am., plaintiff herein, that
(Title) (Company)

he/she is duly authorized to make this Verification, and that the facts set forth in the foregoing Complaint in Civil Action are true and correct to the best of his/her knowledge, information and belief.

John L Flees
(Signature)

WWR#6959365

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
NO: 08-2300-CD

FEDERATED FINANCIAL CORPORATION OF AMERICA
vs
FRANK L. STORY

SERVICE # 1 OF 1

COMPLAINT

SERVE BY: 12/31/2008 HEARING: PAGE: 104988

DEFENDANT: FRANK L. STORY
ADDRESS: 115 21ST. ST.
CLEARFIELD, PA 16830

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT

5
FILED

03:40pm
DEC 10 2008

LM
William A. Shaw
Prothonotary/Clerk of Courts

ATTEMPTS

No longer an inmate @ jail 12/3/08

SHERIFF'S RETURN

NOW, _____ AT _____ AM / PM SERVED THE WITHIN

COMPLAINT ON FRANK L. STORY, 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 FRANK L. STORY

AT (ADDRESS) _____

NOW 12-10-08 AT 3:30 AM / PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF **NOT FOUND** AS TO FRANK L. STORY

REASON UNABLE TO LOCATE NOT FOUND

SWORN TO BEFORE ME THIS

DAY OF _____ 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY: Deputy S. Hunter
Deputy Signature

S. Hunter
Print Deputy Name

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

FEDERATED FINANCIAL CORPORATION OF AMERICA

Plaintiff

No. 08-2300-CD

vs.

COMPLAINT IN CIVIL ACTION

FRANK L STORY

Defendant

FILED ON BEHALF OF
Plaintiff

COUNSEL OF RECORD OF
THIS PARTY:

James C. Warmbrodt,
P.A.I.D.# 42524
Weltman, Weinberg & Reis Co., L.P.A.
436 Seventh Avenue, Suite 1400
Pittsburgh, PA 15219
(412)434-7955
Fax: 412-338-7130

WWR#6959365

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

DEC 01 2008

Attest.

William L. Harlan
Prothonotary/
Clerk of Courts

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

FEDERATED FINANCIAL CORPORATION OF AMERICA

Plaintiff

vs.

Civil Action No.

FRANK L STORY

Defendant

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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.

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

COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
SECOND & MARKET STREETS
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7. Plaintiff avers that the Cardholder Agreement between the parties provides that Plaintiff is entitled to the addition of finance charges at the rate of 30.64% per annum on the unpaid balance.

8. Although repeatedly requested to do so by Plaintiff, Defendant has willfully failed and/or refused to pay the principal balance, finance charges or any part thereof to Plaintiff.

WHEREFORE, Plaintiff demands judgment on Count I against Defendant, FRANK L STORY , individually, in the amount of \$29,828.18 with continuing interest thereon at the Contract rate of 30.64 % per annum from OCTOBER 27 2008 and costs.

THIS IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION OBTAINED SHALL BE USED FOR THAT PURPOSE.

WELTMAN, WEINBERG & REIS, CO., L.P.A.


James C. Warmbrodt,
P.A.I.D# 42524
Weltman, Weinberg & Reis Co .,L.P.A.
436 Seventh Avenue, Suite 1400
Pittsburgh, PA 15219
(412)434-7955
Fax. 412-338-7130
WWR#:6959365

VERIFICATION

The undersigned does hereby verify subject to the penalties of 18 P.A.C.S. §4904 relating to unsworn falsifications to authorities, that he/she is Joan L. Flees
(Name)

VP of Port Svcs of Federated Financial Corp of Am., plaintiff herein, that
(Title) Federated Financial Corp of Am., plaintiff herein, that
(Company)

he/she is duly authorized to make this Verification, and that the facts set forth in the foregoing Complaint in Civil Action are true and correct to the best of his/her knowledge, information and belief.

Joan L Flees
(Signature)

WWR#6959365

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104988
NO: 08-2300-CD
SERVICES 1
COMPLAINT

PLAINTIFF: FEDERATED FINANCIAL CORPORATION OF AMERICA
vs.
DEFENDANT: FRANK L. STORY

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	WELTMAN	8797185	10.00
SHERIFF HAWKINS	WELTMAN	8797185	16.00

5
FILED
03:40pm
MAR 13 2009
LAW
William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

So Answers,

____ Day of _____ 2009



Chester A. Hawkins
Sheriff

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

FEDERATED FINANCIAL

Plaintiff No. : 08-2300-CD

vs.

PRAECIPE TO SETTLE, DISCONTINUE
AND END WITHOUT PREJUDICE TO REFILE

FRANK L STORY

Defendant FILED ON BEHALF OF
Plaintiff

COUNSEL OF RECORD OF
THIS PARTY:

JAMES C. WARMBRODT, Esquire
PA I.D. #42524
WELTMAN, WEINBERG & REIS CO., L.P.A.
1400 Koppers Building
436 Seventh Avenue
Pittsburgh, PA 15219
(412) 434-7955

WWR#6959365

5 FILED 200
07/13/09 Atty
AUG 13 2009 Warmbrodt

William A. Shaw
Prothonotary/Clerk of Courts 610

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

FEDERATED FINANCIAL

Plaintiff

vs.

Civil Action No. : 08-2300-CD

FRANK L STORY

Defendant

PRAECIPE TO SETTLE, DISCONTINUE
AND END WITHOUT PREJUDICE TO REFILE

TO THE PROTHONOTARY OF CLEARFIELD COUNTY:

SIR:

Settle, Discontinue and End the above-captioned matter upon the records of the Court without
prejudice to refile and mark the costs paid.

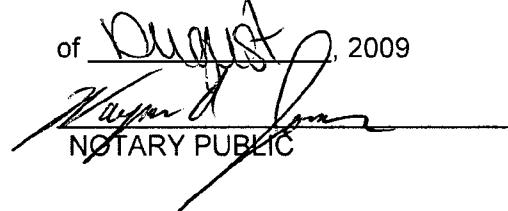
WELTMAN, WEINBERG & REIS CO., L.P.A.

By: 
Attorney for Plaintiff
1400 Koppers Building
436 Seventh Avenue
Pittsburgh, PA 15219
(412) 434-7955
WWR#6959365

SWORN TO AND SUBSCRIBED

before me this _____ day

of August, 2009


NOTARY PUBLIC

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal

Wayne A. Jones, Notary Public
City of Pittsburgh, Allegheny County
My Commission Expires June 26, 2010
Member, Pennsylvania Association of Notaries