

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY  
PENNSYLVANIA

COVER SHEET

Plaintiff:  AMERICAN EXPRESS BANK, FSB	Case No.:
	Type of Pleading: Complaint
	Code & Classification
	Filed on Behalf of : AMERICAN EXPRESS BANK, FSB
Vs.	
Defendant:  CHERYL CHANDOLA	X Counsel of Record Individual, If Pro Se
	Name, Address & Telephone Number:  Apothaker & Associates, P.C. 520 Fellowship Road C306 Mount Laurel, NJ 08054 800-672-0215
	Attorney State ID: 38423

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA  
CIVIL DIVISION-ARBITRATION DOCKET

AMERICAN EXPRESS BANK, FSB  
4315 SOUTH 2700 WEST  
SALT LAKE CITY, UT 84184  
Plaintiff,

vs.

CHERYL CHANDOLA  
240 BRENNAN RD  
WEXFORD, PA 15090  
Defendant.

ARBITRATION DOCKET

NO.:

**HEARING DATE:** \_\_\_\_\_  
Room 523 5th Floor Courthouse  
9:00 a.m.

**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 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. 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 REFERRAL SERVICE, The Allegheny County Bar Association,  
11th Floor Koppers Building, 436 Seventh Ave  
Pittsburgh, Pennsylvania 15219  
Telephone: (412) 261-5555

**HEARING NOTICE**

YOU HAVE BEEN SUED IN COURT. The above Notice to Defend explains what you must do to dispute the claims made against you. If you file the written response referred to in the Notice to Defend, a hearing before a board of arbitrators will take place in Room 523 of the Allegheny County Courthouse, 436 Grant Street, Pittsburgh, Pennsylvania on \_\_\_\_\_ at 9:00 A.M. IF YOU FAIL TO FILE THE RESPONSE DESCRIBED IN THE NOTICE TO DEFEND, A JUDGMENT FOR THE AMOUNT CLAIMED IN THE COMPLAINT MAY BE ENTERED AGAINST YOU BEFORE THE HEARING.

**DUTY TO APPEAR AT ARBITRATION HEARING**

If one or more of the parties is not present at the hearing, THE MATTER MAY BE HEARD AT THE SAME TIME AND DATE BEFORE A JUDGE OF THE COURT WITHOUT THE ABSENT PARTY OR PARTIES. *THERE IS NO RIGHT TO A TRIAL DE NOVO ON APPEAL FROM A DECISION ENTERED BY A JUDGE.*

NOTICE: You must respond to this complaint within twenty (20) days or a judgment for the amount claimed may be entered against you *before the hearing*.

If one or more of the parties is not present at the hearing, the matter may be heard immediately before a judge without the absent party or parties. There is *no right to a trial de novo on appeal from a decision entered by a judge*.

Our File No.: 333785  
APOTHAKER & ASSOCIATES, P.C.  
BY: David J. Apothaker, Esquire  
Attorney I.D.# 38423  
520 Fellowship Road C306  
Mount Laurel, NJ 08054  
(800) 672-0215  
Attorneys for Plaintiff

AMERICAN EXPRESS BANK, FSB	)	COURT OF COMMON PLEAS
4315 SOUTH 2700 WEST	)	ALLEGHENY COUNTY
SALT LAKE CITY, UT 84184	)	
Plaintiff,	)	NO.:
vs.	)	
	)	
CHERYL CHANDOLA	)	
240 BRENNAN RD	)	
WEXFORD, PA 15090	)	
Defendant.	)	
	)	
	)	

**CIVIL ACTION COMPLAINT  
FIRST COUNT**

1. Plaintiff is American Express Bank, FSB ("Plaintiff"), a federally chartered thrift institution, with a principal place of business in Salt Lake City, Utah.
2. Defendant(s) is/are CHERYL CHANDOLA, an adult individual residing at 240 BRENNAN RD WEXFORD, PA 15090.
3. At the special instance and request of Defendant, Plaintiff, AMERICAN EXPRESS BANK, FSB, issued to Defendant(s), Account # ending in 1000.
4. Defendant received, accepted and used the account to its benefit.
5. This account is in default and Defendant(s) has an unpaid balance of \$13,509.96. A true and correct copy of the total due and owing is attached hereto, made a part hereof and marked as Exhibit "A".
6. All credits, if any, to which Defendant(s) is entitled, have been applied to the account and are included in Exhibit "A".
7. Although demand has been made, Defendant(s) has failed to make payment of the amount due as above.

WHEREFORE, Plaintiff demands judgment in favor of Plaintiff and against Defendant(s) for the sum of \$13,509.96 and requests this Court costs to the extent permitted by applicable law.

APOTHAKE & ASSOCIATES, P.C.  
Attorney for Plaintiff  
A Law Firm Engaged in Debt Collection

BY: /s/ David J. Apothaker  
David J. Apothaker

Dated: 1/19/2012

## **VERIFICATION**

I, David J. Apothaker, Esquire, hereby verify subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities that I am counsel for Plaintiff in this action, that I make this Verification based upon the facts as supplied to me by the Plaintiff and/or its agents and because the Plaintiff is outside the jurisdiction of the court, and that the facts set forth in the foregoing Civil Action Complaint are true and correct to the best of my knowledge, information, and belief.

BY: /s/ David J. Apothaker  
David J. Apothaker  
Attorney for Plaintiff

DATE: 1/19/2012

AMERICAN EXPRESS BANK, FSB

CHERYL CHANDOLA  
240 BRENNAN RD  
WEXFORD, PA 15090

STATEMENT OF ACCOUNT

Debtor's Name: CHERYL CHANDOLA

Account Number: ending in 1000

Balance Due: \$13,509.96

Our File No.: 333785

EXHIBIT "A"