

Pennsylvania

- **Contract (written)** - 4 years, 42 Pa. Cons. Stat. Ann. § 5525(a)(8)
- **Contract (oral)** - 4 years, 42 Pa. Cons. Stat. Ann. § 5525(a)(3)
- **Sale of goods** - 4 years, 13 Pa. Cons. Stat. Ann. § 2725; 42 § 5525(a)(2)

Cases Interpreting Statute of Limitations

“An ‘account stated’ traditionally arises when two parties, who engage in a series of transactions with one another, come together to balance the credits and debits and fix upon a total amount owed. This final tally, once assented to, becomes the ‘account stated,’ and any further cause of action is based on this ‘account stated’ rather than on any of the underlying transactions. *Richburg v. Palisades Collection LLC*, 247 F.R.D. 457, 464 (E.D. Pa. 2008), citing *David v. Veitscher Magnesitwerke Actien Gesellschaft*, 348 Pa. 335, 35 A.2d 346, 349 (Pa. 1944).

Actions on accounts stated or for the sale of goods are subject to the four-year limitations period of 42 § 5525(a)(4) or 42 § 5525(a)(2), respectively. *Richburg v. Palisades Collection LLC*, 247 F.R.D. 457, 465 (E.D. Pa. 2008).

Borrowing Statute - 42 Pa. Cons. Stat. Ann. § 5521

The period of limitation applicable to a claim accruing outside this Commonwealth shall be either that provided or prescribed by the law of the place where the claim accrued or by the law of this Commonwealth, whichever first bars the claim. As used in this section “claim” means any right of action which may be asserted in a civil action or proceeding and includes, but is not limited to, a right of action created by statute.

Cases Interpreting Borrowing Statute

With respect to a credit card agreement, a cause of action arises and the statute of limitations begins to run as determined by the final significant event necessary to make the claim suable. In *Hamid v. Stock & Grimes, LLP*, 2011 U.S. Dist. LEXIS 96245 (E.D. Pa. Aug. 26, 2011), the court found that although the cardholder’s failure to pay “set events in motion,” it was the card issuer’s failure to receive payment, in Delaware, that was the final significant event. Thus, the shorter Delaware limitations period applied.