UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

KFIR HAZAN, on behalf of himself and all others similarly situated,

Plaintiffs,

-against-

COMPUTER CREDIT, INC.

Defendant.

CIVIL ACTION

CLASS ACTION COMPLAINT

AND

DEMAND FOR JURY TRIAL

Plaintiff KFIR HAZAN (hereinafter, "Plaintiff"), a New York resident, brings this class action complaint by and through his attorneys, Joseph H. Mizrahi Law, P.C., against Defendant COMPUTER CREDIT, INC. (hereinafter "Defendant"), individually and on behalf of a class of all others similarly situated, pursuant to Rule 23 of the Federal Rules of Civil Procedure, based upon information and belief of Plaintiff's counsel, except for allegations specifically pertaining to Plaintiff, which are based upon Plaintiff's personal knowledge.

JURISDICTION AND VENUE

- 1. The Court has jurisdiction over this class action under 28 U.S.C. § 1331, 15 U.S.C. § 1692 *et seq.* and 28 U.S.C. § 2201. If applicable, the Court also has pendent jurisdiction over the state law claims in this action pursuant to 28 U.S.C. § 1367(a).
- 2. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391(b)(2).

NATURE OF THE ACTION

- 3. Plaintiff brings this class action on behalf of a class of New York consumers seeking redress for Defendant's actions of using an unfair and unconscionable means to collect a debt.
- 4. Defendant's actions violated § 1692 et seq. of Title 15 of the United States Code, commonly referred to as the Fair Debt Collections Practices Act ("FDCPA") which prohibits debt collectors from engaging in abusive, deceptive and unfair practices.

5. Plaintiff is seeking damages, and declaratory and injunctive relief.

PARTIES

- 6. Plaintiff is a natural person and a resident of the State of New York, and is a "Consumer" as defined by 15 U.S.C. §1692(a)(3).
- Upon information and belief, Defendant's principal place of business is located in Winston Salem, NC.
- 8. Upon information and belief, Defendant is a company that uses the mail, telephone, and facsimile and regularly engages in business the principal purpose of which is to attempt to collect debts alleged to be due another.
- 9. Defendant is a "debt collector," as defined under the FDCPA under 15 U.S.C. § 1692a(6).

CLASS ALLEGATIONS

- 10. Plaintiff brings claims, pursuant to the Federal Rules of Civil Procedure (hereinafter "FRCP")

 Rule 23, individually and on behalf of the following consumer class (the "Class"):
 - All New York consumers who received a collection letter from the Defendant attempting to collect an obligation owed, that states an interest charge without clarifying whether that interest is continuing to accrue, in violation of 15 U.S.C. §§1692g and 1692e, et seq.
 - The Class period begins one year to the filing of this Action.
- 11. The Class satisfies all the requirements of Rule 23 of the FRCP for maintaining a class action:
 - Upon information and belief, the Class is so numerous that joinder of all members is impracticable because there are hundreds and/or thousands of persons who have received debt collection letters and/or notices from Defendant that violate specific provisions of the FDCPA. Plaintiff is complaining of a standard form letter and/or notice that is sent to hundreds of persons (*See* Exhibit A, except that the

- undersigned attorney has, in accordance with Fed. R. Civ. P. 5.2 partially redacted the financial account numbers in an effort to protect Plaintiff's privacy);
- There are questions of law and fact which are common to the Class and which
 predominate over questions affecting any individual Class member. These
 common questions of law and fact include, without limitation:
 - a. Whether Defendant violated various provisions of the FDCPA;
 - b. Whether Plaintiff and the Class have been injured by Defendant's conduct;
 - c. Whether Plaintiff and the Class have sustained damages and are entitled to restitution as a result of Defendant's wrongdoing and if so, what is the proper measure and appropriate statutory formula to be applied in determining such damages and restitution; and
 - d. Whether Plaintiff and the Class are entitled to declaratory and/or injunctive relief.
- Plaintiff's claims are typical of the Class, which all arise from the same operative facts and are based on the same legal theories.
- Plaintiff has no interest adverse or antagonistic to the interest of the other members of the Class.
- Plaintiff will fairly and adequately protect the interest of the Class and has retained experienced and competent attorneys to represent the Class.
- A Class Action is superior to other methods for the fair and efficient adjudication
 of the claims herein asserted. Plaintiff anticipates that no unusual difficulties are
 likely to be encountered in the management of this class action.

- A Class Action will permit large numbers of similarly situated persons to prosecute their common claims in a single forum simultaneously and without the duplication of effort and expense that numerous individual actions would engender. Class treatment will also permit the adjudication of relatively small claims by many Class members who could not otherwise afford to seek legal redress for the wrongs complained of herein. Absent a Class Action, class members will continue to suffer losses of statutory protected rights as well as monetary damages. If Defendant's conduct is allowed to proceed without remedy they will continue to reap and retain the proceeds of their ill-gotten gains.
- Defendant has acted on grounds generally applicable to the entire Class, thereby
 making appropriate final injunctive relief or corresponding declaratory relief with
 respect to the Class as a whole.

ALLEGATIONS PARTICULAR TO KFIR HAZAN

- 12. Plaintiff repeats, reiterates and incorporates the allegations contained in paragraphs numbered "1" through "11" herein with the same force and effect as if the same were set forth at length herein.
- 13. Some time prior to April 24, 2017, an obligation was allegedly incurred by Plaintiff to Maimonides Medical Center.
- 14. The aforesaid obligation arose out of a transaction in which money, property, insurance or services, which are the subject of the transaction, are primarily for personal, family or household purposes.
- 15. Plaintiff is a "consumer" as defined by 15 U.S.C. § 1692a(3) of the FDCPA.
- 16. The alleged Maimonides Medical Center obligation is a "debt" as defined by 15 U.S.C. § 1692a(5).

- 17. Maimonides Medical Center is a "creditor" as defined by 15 U.S.C.§ 1692a(4).
- 18. Plaintiff is a "consumer" as defined by 15 U.S.C. § 1692a(3) of the FDCPA.
- 19. Defendant is a "debt collector" as defined by 15 U.S.C. § 1692a(6) of the FDCPA.
- 20. At a time better known to Defendant, Maimonides Medical Center, directly or through an intermediary, contracted Defendant to collect the Maimonides Medical Center debt.
- 21. In its effort to collect on the Maimonides Medical Center obligation, Defendant contacted Plaintiff by written correspondence on April 24, 2017. *See* Exhibit A.
- 22. The Letter was sent or caused to be sent by persons employed by Defendant as a "debt collector" as defined by 15 U.S.C. §1692a(6).
- 23. The Letter is a "communication" as defined by 15 U.S.C. § 1692a(2).
- 24. The Letter states in pertinent part: "Pay the amount due to prevent further collection activity by Computer Credit, Inc."
- 25. Further, in regard to the current creditor Defendant's Letter merely states "Provider Detail:

 Maimonides Medical Center."
- 26. As set forth in the following Counts, Defendant's communication violated the FDCPA.

First Count Violation of 15 U.S.C. § 1692g Validation of Debts

- 27. Plaintiff repeats, reiterates and incorporates the allegations contained in paragraphs numbered "1" through "26" herein with the same force and effect as if the same were set forth at length herein.
- 28. 15 U.S.C. § 1692g provides that within five days after the initial communication with a consumer in connection with the collection of any debt, a debt collector shall, unless the information is contained in the initial communication or the consumer has paid the debt, send the consumer a written notice containing certain enumerated information.

- 29. The written notice must contain the amount of the debt.
 The written notice must contain the name of the creditor to whom the debt is owed.
- 30. The written notice must contain a statement that unless the consumer, within thirty days after receipt of the notice, disputes the validity of the debt, or any portion thereof, the debt will be assumed to be valid by the debt collector.
- 31. The written notice must contain a statement that if the consumer notifies the debt collector in writing within the thirty-day period that the debt, or any portion thereof, is disputed, the debt collector will obtain verification of the debt or a copy of a judgment against the consumer and a copy of such verification or judgment will be mailed to the consumer by the debt collector.
- 32. The written notice must contain a statement that, upon the consumer's written request within the thirty-day period, the debt collector will provide the consumer with the name and address of the original creditor, if different from the current creditor.
- 33. 24. A debt collector has the obligation, not just to convey the required information, but also to convey such clearly.
- 34. Even if a debt collector conveys the required information accurately, the debt collector nonetheless violates the FDCPA if that information is overshadowed or contradicted by other language in the communication.
- 35. Even if a debt collector conveys the required information accurately, the debt collector nonetheless violates the FDCPA if that information is overshadowed by other collection activities during the 30-day validation period following the communication.
- 36. The letter directs Plaintiff to "Pay the amount due to prevent further collection activity by Computer Credit, Inc."
- 37. This statement overshadows Plaintiff's absolute right to dispute the debt.

- 38. This statement overshadows Plaintiff's absolute right to seek validation of the debt.
- 39. This statement overshadows Plaintiff's absolute right to request the name of the original creditor.
- 40. Pursuant to 15 U.S.C. § 1692g(b), if Plaintiff exercises the foregoing rights, Defendant must stop its collection efforts as a matter of law until Defendant satisfies Plaintiff's validation requests.
- 41. Such duty to stop collection efforts is not contingent upon Plaintiff making any payment to Defendant.
- 42. Defendant's letter would likely make the unsophisticated consumer uncertain as to her rights.
- 43. Defendant's letter would likely lead the unsophisticated consumer to believe that the only way to make Defendant stop its collection efforts is to make payment in full, contrary to law.
- 44. Defendant has therefore violated 15 U.S.C. § 1692g.

Second Count Violation of 15 U.S.C. § 1692g Name of the Creditor to Whom the Debt is Owed

- 45. Plaintiff repeats, reiterates and incorporates the allegations contained in paragraphs numbered "1" through "44" herein with the same force and effect as if the same were set forth at length herein.
- 46. 15 U.S.C. § 1692g provides that within five days after the initial communication with a consumer in connection with the collection of any debt, a debt collector shall, unless the information is contained in the initial communication or the consumer has paid the debt, send the consumer a written notice containing certain enumerated information.
- 47. One such request is that the debt collector provide "the name of the creditor to whom the debt is owed." 15 U.S.C. § 1692g(a)(2).
- 48. A debt collector has the obligation not just to convey the name of the creditor to whom the debt is owed, but also to convey such clearly.

- 49. A debt collector has the obligation not just to convey the name of the creditor to whom the debt is owed, but also to state such explicitly.
- 50. Merely naming the creditor without specifically identifying the entity as the current creditor to whom the debt is owed is not sufficient to comply with 15 U.S.C. § 1692g(a)(2).
- 51. Even if a debt collector conveys the required information, the debt collector nonetheless violates the FDCPA if it conveys that information in a confusing or contradictory fashion so as to cloud the required message with uncertainty.
- 52. When determining whether the name of the creditor to whom the debt is owed has been conveyed clearly, an objective standard, measured by how the "least sophisticated consumer" would interpret the notice, is applied.
- 53. Defendant's letter fails to explicitly identify the name of the creditor to whom the debt is owed.
- 54. Defendant's April 24, 2017 letter to Plaintiff fails to identify any creditor to whom the debt is owed.
- 55. Indeed, Defendant's letter fails to identify any entity or individual as a "creditor."
- 56. Defendant's letter merely states, "PROVIDER DETAIL Maimonides Medical Center Bank
 TJX Rewards Credit Card."
- 57. The letter fails to indicate whether the "Provider Detail" refers to Plaintiff's creditor.
- 58. The letter fails to indicate whether the "Provider Detail" refers to the creditor to whom the debt is owed.
- 59. The letter fails to indicate whether the "Provider Detail" refers to the original creditor or the current creditor to whom the debt is owed.
- 60. Defendant's letter states, "Your overdue balance with Maimonides Medical Center has been referred to Computer Credit, Inc. for collection."

- 61. The letter fails to indicate who referred the account to Defendant.
- 62. Defendant failed to clearly state the name of the creditor to whom the debt is owed.
- 63. The least sophisticated consumer would likely be confused as to the creditor to whom the debt is owed.
- 64. Defendant has violated § 1692g as it failed to clearly and explicitly convey the name of the creditor to whom the debt is owed.
- 65. Defendant could have taken the steps necessary to bring its actions within compliance with the FDCPA, but neglected to do so and failed to adequately review its actions to ensure compliance with the law.

Third Count Violation of 15 U.S.C. § 1692e False or Misleading Representations

- 66. Plaintiff repeats, reiterates and incorporates the allegations contained in paragraphs numbered "1" through "65" herein with the same force and effect as if the same were set forth at length herein.
- 67. 15 U.S.C. § 1692e prohibits a debt collector from using any false, deceptive, or misleading representation or means in connection with the collection of any debt.
- 68. While § 1692e specifically prohibits certain practices, the list is non-exhaustive, and does not preclude a claim of falsity or deception based on any non-enumerated practice.
- 69. Collection notices are deceptive if they can be reasonably read to have two or more different meanings, one of which is inaccurate.
- 70. The question of whether a collection letter is deceptive is determined from the perspective of the "least sophisticated consumer."
- 71. For purposes of 15 U.S.C. § 1692e, the failure to clearly and accurately identify the creditor to whom the debt is owed is unfair and deceptive to the least sophisticated consumer.

- 72. Because the collection letter in the instant case is reasonably susceptible to an inaccurate reading, as described above, it is deceptive within the meaning of 15 U.S.C. § 1692e.
- 73. Defendant violated § 1692e by using a false, deceptive and misleading representation in its attempt to collect a debt. *Datiz v. Int'l Recovery Assocs., Inc.*, No. 15CV3549ADSAKT, 2016 WL 4148330 (E.D.N.Y. Aug. 4, 2016), motion for relief from judgment denied, No. 15CV3549ADSAKT, 2017 WL 59085 (E.D.N.Y. Jan. 4, 2017); *McGinty v. Prof'l Claims Bureau, Inc.*, No. 15CV4356SJFARL, 2016 WL 6069180 (E.D.N.Y. Oct. 17, 2016).
- 74. Defendant could have taken the steps necessary to bring its actions within compliance with the FDCPA, but neglected to do so and failed to adequately review its actions to ensure compliance with the law.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff demands judgment against Defendants as follows:

- (a) Declaring that this action is properly maintainable as a Class Action and certifying Plaintiff as Class representative and Joseph H. Mizrahi Law, P.C., as Class Counsel;
- (b) Awarding Plaintiff and the Class statutory damages;
- (c) Awarding Plaintiff and the Class actual damages;
- (d) Awarding Plaintiff costs of this Action, including reasonable attorneys' fees and expenses;
- (e) Awarding pre-judgment interest and post-judgment interest; and
- (f) Awarding Plaintiff and the Class such other and further relief as this Court may deem just and proper.

Respectfully submitted,

By: /s/ Joseph H. Mizrahi Joseph H. Mizrahi, Esq. Joseph H. Mizrahi Law, P.C. 300 Cadman Plaza West, 12th Floor Brooklyn, New York 11201

Phone: (917) 299-6612 Fax: (718) 425-8954

Email: Joseph@Jmizrahilaw.com

Attorney for Plaintiff

DEMAND FOR TRIAL BY JURY

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff hereby requests a trial by jury on all issues so triable.

/s/ Joseph H. Mizrahi
Joseph H. Mizrahi, Esq.

Dated: Brooklyn, New York

February 2, 2018

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiation the civil dealers sheet.

purpose of initiating the civil d	ocket sneet. (SEE INSTRUC	TIONS ON NEXT PAGE OF T		20			
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(b) County of Residence of (E.	of First Listed Plaintiff XCEPT IN U.S. PLAINTIFF CA	Kings (SES)	NOTE: IN LAND	County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY) NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.			
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(c) Attorneys (Firm Name, A JOSEPH H. MIZRAHI LA NY 11201, (917) 299-661	.W, P.C., 300 Cadman			<i></i>			
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☐ 2 U.S. Government Defendant	☐ 4 Diversity (Indicate Citizenship)	ip of Parties in Item III)	Citizen of Another State	☐ 2 ☐ 2 Incorporated and I of Business In	1		
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IV. NATURE OF SUIT		ely) PRTS	FORFEITURE/PENALTY		of Suit Code Descriptions. OTHER STATUTES		
□ 110 Insurance □ 120 Marine □ 130 Miller Act □ 140 Negotiable Instrument □ 150 Recovery of Overpayment & Enforcement of Judgment □ 151 Medicare Act □ 152 Recovery of Defaulted Student Loans (Excludes Veterans) □ 153 Recovery of Overpayment of Veteran's Benefits □ 160 Stockholders' Suits □ 190 Other Contract □ 195 Contract Product Liability □ 196 Franchise REAL PROPERTY □ 210 Land Condemnation □ 220 Foreclosure □ 230 Rent Lease & Ejectment □ 245 Tort Product Liability □ 290 All Other Real Property	PERSONAL INJURY □ 310 Airplane □ 315 Airplane Product Liability □ 320 Assault, Libel &	PERSONAL INJURY 365 Personal Injury - Product Liability 367 Health Care/ Pharmaceutical Personal Injury Product Liability 368 Asbestos Personal Injury Product Liability 368 Asbestos Personal Injury Product Liability 370 Other Fraud 371 Truth in Lending 380 Other Personal Property Damage Product Liability 385 Property Damage Product Liability PRISONER PETITIONS Habeas Corpus: 463 Alien Detainee 510 Motions to Vacate Sentence 530 General 535 Death Penalty Other: 540 Mandamus & Other 550 Civil Rights 555 Prison Condition 560 Civil Detainee - Conditions of Confinement	☐ 625 Drug Related Seizure of Property 21 USC 88 ☐ 690 Other	□ 422 Appeal 28 USC 158 □ 423 Withdrawal 28 USC 157 PROPERTY RIGHTS □ 820 Copyrights □ 830 Patent □ 835 Patent - Abbreviated New Drug Application □ 840 Trademark SOCIAL SECURITY □ 861 HIA (1395ff) □ 862 Black Lung (923) □ 863 DIWC/DIWW (405(g)) □ 864 SSID Title XVI □ 865 RSI (405(g)) FEDERAL TAX SUITS □ 870 Taxes (U.S. Plaintiff or Defendant) □ 871 IRS—Third Party 26 USC 7609	□ 375 False Claims Act □ 376 Qui Tam (31 USC		
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VII. REQUESTED IN COMPLAINT:		IS A CLASS ACTION	DEMAND \$	CHECK YES only JURY DEMAND	if demanded in complaint: Yes □ No		
VIII. RELATED CASI IF ANY	E(S) (See instructions):	JUDGE		DOCKET NUMBER			
DATE 2/2/2018 FOR OFFICE USE ONLY		signature of attor /s/ Joseph H. Miz					
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CERTIFICATION OF ARBITRATION ELIGIBILITY

Local Arbitration Rule 83.10 provides that with certain exceptions, actions seeking money damages only in an amount not in excess of \$150,000, exclusive of interest and costs, are eligible for compulsory arbitration. The amount of damages is presumed to be below the threshold amount unless a certification to the contrary is filed.

-,	H. MIZRAHI	anulcory arbi	itration for the fo		counsel for PLAINTIFF			, do hereby certify that the above captioned civil action
	is ineligible for compulsory arbitration for the following reason(s): monetary damages sought are in excess of \$150,000, exclusive of interest and costs,							
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	c) If this is a Fair Debt Collection Practice Act case, specify the County in which the offending communication was received: KINGS COUNTY.							
If your answer to question 2 (b) is "No," does the defendant (or a majority of the defendants, if there is more than one) reside in Nassau or Suffolk County, or, in an interpleader action, does the claimant (or a majority of the claimants, if there is more than one) reside in Nassau or Suffolk County? Yes No								
Canon					resident of the Cou	ınty in which	it has	s the most significant contacts).
BAR ADMISSION								
	I am curr	rently admit	ted in the East	ern Dist	rict of New York and	d currently a	memb	ber in good standing of the bar of this court.
				Yes				No
	Are you	currently	the subject of	any di	sciplinary action (s	s) in this or	any c	other state or federal court?
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UNITED STATES DISTRICT COURT

for the

Eastern District of New York

KFIR HAZAN, on behalf of himself and all others similarly situated)))					
Plaintiff(s))					
V.	Civil Action No.					
COMPUTER CREDIT INC.) CIVII ACTION NO.					
COMPUTER CREDIT INC.						
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Defendant(s)						
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SUMMONS IN	A CIVIL ACTION					
To: (Defendant's name and address) COMPUTER CREDIT INC. C/O CORPORATION SERVICE COMPANY 80 STATE STREET ALBANY, NEW YORK 12207						
A lawsuit has been filed against you. Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ.						
	swer to the attached complaint or a motion under Rule 12 of					
whose name and address are: JOSEPH H. MIZRAHI LAV	W PC					
300 CADMAN PLAZA W, 12 FLOOR BROOKLYN, NEW YORK 11201						
If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.						
	DOUGLAS C. PALMER CLERK OF COURT					
5						
Date:	Signature of Clerk or Deputy Clerk					
	2.6					

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No.

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

was re	ceived by me on (date)	·		
	☐ I personally served	the summons on the individual	at (place)	
			on (date)	
	☐ I left the summons	at the individual's residence or	usual place of abode with (name)	
		, a perso	on of suitable age and discretion who res	sides there,
	on (date)	, and mailed a copy to	the individual's last known address; or	
	☐ I served the summo	ons on (name of individual)		, who is
	designated by law to a	accept service of process on beh	alf of (name of organization)	
			on (date)	; or
	☐ I returned the summ	nons unexecuted because		; or
	☐ Other (specify):			
	My fees are \$	for travel and \$	for services, for a total of \$	0.00
	I declare under penalty	y of perjury that this information	n is true.	
Date:				
Dute.			Server's signature	
			Printed name and title	
			Server's address	

Additional information regarding attempted service, etc:

ELAIM DEPT 006210 : 470 West Hanes Mill Road, Post Office Box 5238, Winston-Salem, NC,27113-5238 336-761-1538

041 CH1BLU Kfir Hazan 1499

PROVIDER DETAIL

Maimonides Medical Center

You may call Patient Accounts Customer Service (718) 283-6740

Office Hours 8:00 am - 5:00 pm EST Pay Online: maimonidesmed.ixt.com

Serial No. 2309

Reference: 01-26-17 P#187 33046 O

PAST DUE AMOUNT: \$5.626.21

PLEASE SEE IMPORTANT NOTICE ON BACK

Dear Kfir Hazan:

Your overdue balance with your creditor Maimonides Medical Center has been referred to Computer Credit, Inc. (also referred to in this letter as CCI) for collection. Our records indicate that this debt is your responsibility. This letter will serve to inform you that your account remains unpaid and we expect resolution of your obligation to the hospital. Computer Credit, Inc. is a

This communication is an attempt to collect a debt and any information obtained will be used for that purpose. Unless you notify our office that you dispute the validity of this debt or any portion thereof within 30 days of receiving this letter, we will assume that the debt is valid and expect it to be paid.

debt collector. We are licensed by the New York City Department of Consumer Affairs, License Number 1247311.

Pay the amount due to prevent further collection activity by Computer Credit, Inc. We appreciate your attention to this matter.

C. Jordan

C. Jordan
Director of Operations

Partial payments will not stop the collection process. You may call the creditor to discuss your specific situation.

Financial assistance may be available to those who qualify. To determine if you are eligible you may contact the hospital at 718-283-6740 or visit www.Maimonidesmed.org>For Patients & Visitors>Financial Assistance.



0848557132

To pay securely www.informationcci.com

24

Toll free: 1-855-SELFPAY

(1-855-735-3729)



Reference Number

8210

15330460

Return this portion with your payment

IF PAYING BY CREDIT CARD.	PLEASE FILL OUT BELOW
V/SA Mastercard	DISCOVER
CARD NUMBER	EXP DATE
SECURITY CODE	AMOUNT
SIGNATURE	
PRINT CARDHOLDER'S NAME	
BILLING ADDRESS	BILLING ZIP CODE
Computer Credit Inc	

GUARANTOR Kfir Hazan Reference:

SERIAL NO: 2309 AMOUNT DUE \$5,626.21

You may make check payable to:

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: <u>Lawsuit: Computer Credit Failed to Live Up to FDCPA Standards</u>