UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

Matthew Hochstasser, *individually* and on behalf of all others similarly situated;

Plaintiff,

Civil Action No: _____

CLASS ACTION COMPLAINT
DEMAND FOR JURY TRIAL

-v.-

Conrad Credit Corporation, and John Does 1-25

Defendant(s).

Plaintiff Matthew Hochstasser (hereinafter, "Plaintiff" or "Hochstasser"), a New York resident, brings this Class Action Complaint by and through his attorneys, Stein Saks, PLLC, against Defendant Conrad Credit Corporation (hereinafter "Defendant" or "CCC"), 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.

INTRODUCTION/PRELIMINARY STATEMENT

1. Congress enacted the FDCPA in 1977 in response to the "abundant evidence of the use of abusive, deceptive, and unfair debt collection practices by many debt collectors." 15 U.S.C. §1692(a). At that time, Congress was concerned that "abusive debt collection practices contribute to the number of personal bankruptcies, to material instability, to the loss of jobs, and to invasions of individual privacy." *Id.* Congress concluded that "existing laws...[we]re

inadequate to protect consumers," and that "'the effective collection of debts" does not require "misrepresentation or other abusive debt collection practices." 15 U.S.C. §§ 1692(b) & (c).

2. Congress explained that the purpose of the Act was not only to eliminate abusive debt collection practices, but also to "insure that those debt collectors who refrain from using abusive debt collection practices are not competitively disadvantaged." ld. § 1692(e). After determining that the existing consumer protection laws ·were inadequate~ id § 1692(b), Congress gave consumers a private cause of action against debt collectors who fail to comply with the Act. Id. § 1692k.

JURISDICTION AND VENUE

- 3. The Court has jurisdiction over this class action pursuant to <u>28 U.S.C.</u> § <u>1331</u>, <u>15 U.S.C.</u> § <u>1692</u> et. seq. and <u>28 U.S.C.</u> § <u>2201</u>. If applicable, the Court also has pendant jurisdiction over the State law claims in this action pursuant to 28 U.S.C. § <u>1367(a)</u>.
 - 4. Venue is proper in this judicial district pursuant to <u>28 U.S.C.</u> § <u>1391(b)(2)</u>.

NATURE OF THE ACTION

- 5. Plaintiff brings this class action on behalf of a class of New York consumers under§ 1692 et seq. of Title 15 of the United States Code, commonly referred to as the Fair Debt Collections Practices Act ("FDCPA"), and
 - 6. Plaintiff is seeking damages and declaratory and injunctive relief.

PARTIES

7. Plaintiff is a resident of the State of New York, County of Suffolk, residing at 3 N Cozine Road Manorville, NY 11949-3031.

- 8. Conrad Credit Corporation is a "debt collector" as the phrase is defined in 15 U.S.C. § 1692(a)(6) and used in the FDCPA with an address at 476 W. Vermont Avenue, Escondido, CA 92025.
- 9. 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.
- 10. Defendant is a "debt collector," as defined under the FDCPA under 15 U.S.C. § 1692a(6).
- 11. John Does l-25, are fictitious names of individuals and businesses alleged for the purpose of substituting names of Defendants whose identities will be disclosed in discovery and should be made parties to this action.

CLASS ALLEGATIONS

- 12. Plaintiffs bring this claim on behalf of the following case, pursuant to Fed. R. Civ. P. 23(a) and 23(b)(3).
 - 13. The Class consists of:
 - a. all individuals with addresses in the State of New York;
 - b. to whom Conrad Credit Corporation sent an initial collection letter attempting to collect a consumer debt;
 - c. that including false threats/disclosures that interest is continuously accruing,
 when in fact interest is not accruing at this time;
 - d. which letter was sent on or after a date one (1) year prior to the filing of this action and on or before a date twenty-one (21) days after the filing of this action.

- 14. The identities of all class members are readily ascertainable from the records of Defendant and those companies and entities on whose behalf they attempt to collect and/or have purchased debts.
- 15. Excluded from the Plaintiff Classes are the Defendants and all officer, members, partners, managers, directors and employees of the Defendants and their respective immediate families, and legal counsel for all parties to this action, and all members of their immediate families.
- 16. There are questions of law and fact common to the Plaintiff Classes, which common issues predominate over any issues involving only individual class members. The principal issue is whether the Defendant's written communications to consumers, in the forms attached as Exhibit A, violate 15 U.S.C. §§ 1692e and 1692g.
- 17. The Plaintiffs' claims are typical of the class members, as all are based upon the same facts and legal theories. The Plaintiffs will fairly and adequately protect the interests of the Plaintiff Classes defined in this complaint. The Plaintiffs have retained counsel with experience in handling consumer lawsuits, complex legal issues, and class actions, and neither the Plaintiffs nor their attorneys have any interests, which might cause them not to vigorously pursue this action.
- 18. This action has been brought, and may properly be maintained, as a class action pursuant to the provisions of Rule 23 of the Federal Rules of Civil Procedure because there is a well-defined community interest in the litigation:
 - a. <u>Numerosity:</u> The Plaintiffs are informed and believe, and on that basis allege, that the Plaintiff Classes defined above are so numerous that joinder of all members would be impractical.

- b. <u>Common Questions Predominate:</u> Common questions of law and fact exist as to all members of the Plaintiff Classes and those questions predominance over any questions or issues involving only individual class members. The principal issue is whether the Defendant's written communications to consumers, in the forms attached as Exhibit A violate 15 U.S.C. § 1692e and §1692g.
- c. <u>Typicality:</u> The Plaintiff's claims are typical of the claims of the class members. The Plaintiffs and all members of the Plaintiff Classes have claims arising out of the Defendant's common uniform course of conduct complained of herein.
- d. Adequacy: The Plaintiffs will fairly and adequately protect the interests of the class members insofar as Plaintiffs have no interests that are adverse to the absent class members. The Plaintiffs are committed to vigorously litigating this matter. Plaintiffs have also retained counsel experienced in handling consumer lawsuits, complex legal issues, and class actions. Neither the Plaintiffs nor their counsel have any interests which might cause them not to vigorously pursue the instant class action lawsuit.
- e. <u>Superiority:</u> A class action is superior to the other available means for the fair and efficient adjudication of this controversy because individual joinder of all members would be impracticable. Class action treatment will permit a large number of similarly situated persons to prosecute their common claims in a single forum efficiently and without unnecessary duplication of effort and expense that individual actions would engender.

- 19. Certification of a class under Rule 23(b)(3) of the Federal Rules of Civil Procedure is also appropriate in that the questions of law and fact common to members of the Plaintiff Classes predominate over any questions affecting an individual member, and a class action is superior to other available methods for the fair and efficient adjudication of the controversy.
- 20. Depending on the outcome of further investigation and discovery, Plaintiffs may, at the time of class certification motion, seek to certify a class(es) only as to particular issues pursuant to Fed. R. Civ. P. 23(c)(4).

FACTUAL ALLEGATIONS

- 21. Plaintiff repeats, reiterates and incorporates the allegations contained in paragraphs numbered above herein with the same force and effect as if the same were set forth at length herein.
- 22. Some time prior to July 24, 2017, an obligation was allegedly incurred to Vacation Village At Weston.
- 23. The Vacation Village At Weston obligation arose out of transactions in which money, property, insurance or services, which are the subject of the transaction, are primarily for personal, family or household purposes.
- 24. The alleged Vacation Village At Weston obligation is a "debt" as defined by 15 U.S.C. §1692a(5).
 - 25. Vacation Village At Weston is a "creditor" as defined by 15 U.S.C. §1692a(4).
- 26. Vacation Village At Weston or a subsequent owner of the Vacation Village At Weston debt contracted the Defendant to collect the alleged debt.

27. Defendant collects and attempts to collect debts incurred or alleged to have been incurred for personal, family or household purposes on behalf of creditors using the United States Postal Services, telephone and internet.

Violation I – July 24, 2017 Collection Letter

- 28. On or about July 24, 2017, Defendant sent the Plaintiff an initial contact notice (the "Letter") regarding the alleged debt owed to Vacation Village At Weston. **See July 24, 2017 Collection Letter Attached hereto as Exhibit A.**
- 29. When a debt collector solicits payment from a consumer, it must, within five days of an initial communication send the consumer a written notice containing:
 - (1) the amount of the debt;
 - (2) the name of the creditor to whom the debt is owed;
 - (3) 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;
 - (4) 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 the judgment against the consumer and a copy of such verification or judgment will be mailed to the consumer by the debt collector; and
 - (5) 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. 15 U.S.C. § 1692g(a).

- 30. The FDCPA further provides 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 shall cease collection . . . until the debt collector obtains verification of the debt . . . and a copy of such verification is mailed to the consumer by the debt collector." 15 U.S.C. § 1692g(b).
- 31. Although a collection letter may track the statutory language, "the collector nevertheless violates the Act if it conveys that information in a confusing or contradictory fashion so as to cloud the required message with uncertainty." Russell v. EQUIFAX A.R.S., 74 F.3d 30, 35 (2d Cir. 1996) ("It is not enough for a debt collection agency to simply include the proper debt validation notice in a mailing to a consumer-- Congress intended that such notice be clearly conveyed."). Put differently, a notice containing "language that 'overshadows or contradicts' other language informing a consumer of her rights . . . violates the Act." Russell, 74 F.3d at 34.
 - 32. The top of the letter states:

 Principal:
 \$2,448.67

 Interest:
 \$0.00

 Miscellaneous:
 \$0.00

 Total To Date:
 \$2,448.67

33. The letter, in the third paragraph, states:

Your balance may periodically increase due to the addition of accrued interest in the agreement with the creditor or as provided [b]y law.

34. Defendant is aware that during the collection of this debt the balance will not vary at all due to interest charges and stating that it may increase is merely a deceptive collection tactic.

- 35. Furthermore, the threat of a balance increase overshadows the "g-notice" language and coerces the consumer not to exert his rights under the Fair Debt Collection Practices Act.
- 36. This language threatens the consumer's validations rights and coerces payment from the consumer by making false and deceptive threats during the initial thirty-day period.
- 37. As a result of Defendant's deceptive, misleading and unfair debt collection practices, Plaintiff has been damaged.

COUNT I VIOLATIONS OF THE FAIR DEBT COLLECTION PRACTICES ACT 15 U.S.C. §1692e et seq.

- 38. Plaintiff repeats, reiterates and incorporates the allegations contained in paragraphs above herein with the same force and effect as if the same were set forth at length herein.
- 39. Defendant's debt collection efforts attempted and/or directed towards the Plaintiff violated various provisions of the FDCPA, including but not limited to 15 U.S.C. § 1692e.
- 40. Pursuant to 15 U.S.C. §1692e, a debt collector may not use any false, deceptive, or misleading representation or means in connection with the collection of any debt.
 - 41. Defendant violated §1692e:
 - a. As the Letter it is open to more than one reasonable interpretation, at least one of which is inaccurate.
 - b. By making a false and misleading representation in violation of §1692e(10).
- 42. By reason thereof, Defendant is liable to Plaintiff for judgment that Defendant's conduct violated Section 1692e et seq. of the FDCPA, actual damages, statutory damages, costs and attorneys' fees.

COUNT II VIOLATIONS OF THE FAIR DEBT COLLECTION PRACTICES ACT 15 U.S.C. §1692g et seq.

- 43. Plaintiff repeats, reiterates and incorporates the allegations contained in paragraphs above herein with the same force and effect as if the same were set forth at length herein.
- 44. Defendant's debt collection efforts attempted and/or directed towards the Plaintiff violated various provisions of the FDCPA, including but not limited to 15 U.S.C. § 1692g.
 - 45. Pursuant to 15 USC §1692g, a debt collector:

Within five days after the initial communication with a consumer in connection with the collection of any debt, a debt collector shall, unless the following information is contained in the initial communication or the consumer has paid the debt, send the consumer a written notice containing –

- 1. The amount of the debt;
- 2. The name of the creditor to whom the debt is owed;
- 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 debtcollector;
- 4. A statement that the consumer notifies the debt collector in writing within 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; and
- 5. 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.
- 46. The Defendant violated 15 U.S.C. §1692g, by threating of a balance increase due to interest charges, which overshadows the "g-notice" language and coerces the consumer not to exert its rights under the FDCPA for fear of the balance increasing.
- 47. By reason thereof, Defendant is liable to Plaintiff for judgment that Defendant's conduct violated Section 1692g et seq. of the FDCPA, actual damages, statutory damages, costs and attorneys' fees.

DEMAND FOR TRIAL BY JURY

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

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Matthew Hochstasser, individually and on behalf of all others similarly

situated, demands judgment from Defendant Conrad Credit Corporation, as follows:

1. Declaring that this action is properly maintainable as a Class Action and certifying

Plaintiff as Class representative, and Daniel Kohn, Esq. as Class Counsel;

2. Awarding Plaintiff and the Class statutory damages;

3. Awarding Plaintiff and the Class actual damages;

4. Awarding Plaintiff costs of this Action, including reasonable attorneys' fees and

expenses;

5. Awarding pre-judgment interest and post-judgment interest; and

6. Awarding Plaintiff and the Class such other and further relief as this Court may

deem just and proper.

Dated: Hackensack, New Jersey

July 12, 2018

/s/ Daniel Kohn

By: Daniel Kohn Stein Saks, PLLC 285 Passaic Street Hackensack, NJ 07601 Phone: (201) 282-6500

Fax: (201) 282-6501

Email: dkohn@steinsakslegal.com

Attorneys For Plaintiff

CREDIT CORPORATION

(888) 904-8963

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We accept VISA and MasterCard.

Please see reverse side for credit card payment.

To pay online please go to http://payconrad.com/ccc

July 24, 2017

Creditor:

Vacation Village At Weston

Account #:

356

Principal:

\$2448.67

Interest: Miscellaneous: \$0.00 \$0.00

Total To Date:

\$2448.67

Your account has been referred to this agency by Vacation Village At Weston for collection. Please submit total payment to address below.

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of this debt or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days from receiving this notice that you dispute the validity of this debt or any portion thereof, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request this office in writing within 30 days after receiving this notice, this office will provide you with the name and address of the original creditor, if different from the current creditor.

Your balance may periodically increase due to the addition of accrued interest in the agreement with the creditor or as provided my law.

This has been sent to you by a collection agency. This is an attempt to collect a debt. Any information obtained will be used for that purpose.

Paul Miller Collection Representative

NOTE: SEE REVERSE SIDE FOR IMPORTANT INFORMATION

Detach Lower Portion and Return with Payment

ICU101479LTR1

PO Box 469108 Escondido CA 92046-9108 ADDRESS SERVICE REQUESTED

(888) 904-8963

July 24, 2017

We accept VISA and MasterCard.
Please see reverse side for credit card payment.
To pay online please go to http://payconrad.com/ccc

REMIT TO:

Account #: \$56
Total To Date: \$2448.67

Case 2:18-cv-045764West Vermont Avenue • Escondido / California 62025-6566 2 PageID #: 14 Hours of Operation (PST): Monday - Friday 7AM - 6PM; Saturday 8AM - 12PM (888) 904-8963

NOTE: We are required under state law to notify customers of the following rights. This list does not contain a complete list of the rights consumers have under state and federal law.

CA Notice: The state Rosenthal Fair Debt Collection Practices Act and the Federal Fair Debt Collection Practices Act require that, except under unusual circumstances, collectors may not contact you before 8 a.m. or after 9 p.m. They may not harass you by using threats of violence or arrest or by using obscene language. Collectors may not use false or misleading statements or call you at work if they know or have reason to know that you may not receive personal calls at work. For the most part, collectors may not tell another person, other then your attorney or spouse, about your debt. Collectors may contact another person to confirm your location or enforce a judgment. For more information about debt collection activities, you may contact the Federal Trade Commission at 1-877-FTC-HELP or www.ftc.gov.

As required by law, you are hereby notified that a negative credit report reflecting on your credit record may be submitted to a credit reporting agency if you fail to fulfill the terms of your credit obligations. But we will not submit a negative credit report to a credit reporting agency about this credit obligation until the expiration of the time period described on the front of this notice.

CO Notice: A consumer has the right to request in writing that a debt collector or collection agency cease further communication with the consumer. A written request to cease communication will not prohibit the debt collector or collection agency from taking any other action authorized by law to collect the debt. In-State Office: 1776 S. Jackson Street, Suite 900, Denver, CO 80210; (303) 753-0945. FOR INFORMATION ABOUT THE COLORADO FAIR DEBT COLLECTION PRACTICE ACT SEE WWW.COLORADOATTORNEYGENERAL.GOV/CA.

MA Notice: NOTICE OF IMPORTANT RIGHTS

YOU HAVE THE RIGHT TO MAKE A WRITTEN OR ORAL REQUEST THAT TELEPHONE CALLS REGARDING YOUR DEBT NOT BE MADE TO YOU AT YOUR PLACE OF EMPLOYMENT. ANY SUCH ORAL REQUEST WILL BE VALID FOR ONLY TEN DAYS UNLESS YOU PROVIDE WRITTEN CONFIRMATION OF THE REQUEST POSTMARKED OR DELIVERED WITHIN SEVEN DAYS OF SUCH REQUEST. YOU MAY TERMINATE THIS REQUEST BY WRITING TO THE COLLECTION AGENCY.

ACCOUNT REPRESENTATIVE, 5230 Washington St. West Roxbury, MA 02132; Office hours (ET): 10:00 AM - 3:00 PM Monday - Thursday. PLEASE MAIL ALL INQUIRIES TO THE CALIFORNIA ADDRESS ON THE FRONT OF THIS NOTICE.

MN Notice: This collection agency is licensed by the Minnesota Department of Commerce.

NC Notice: North Carolina Department of Insurance permit number 1048

NY Notice: New York City License Number 292531.

TN Notice: This collection agency is licensed by the Collection Service Board of the Department of Commerce and Insurance.

UT Notice: As required by Utah law, you are hereby notified that a negative credit report reflecting on your credit record may be submitted to a credit reporting agency if you fail to fulfill the terms of your credit obligations. We will not submit negative report to a credit reporting agency about this obligation until the expiration of the time period described on the front of this notice.

WI Notice: This collection agency is licensed by the Division of Banking, PO Box 7876, Madison, Wisconsin 53707.

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	if you wish to make your payment via credit card, please complete the information below and return in the enclosed envelope. The 3-digit iD number is located on the reverse side of your credit card. *																			
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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 initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

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(c) Attorneys (Firm Name, A	Address and Talankon a Nouska)		Attorneys (If Known))					
Daniel Kohn - Stein Saks		r)		Attorneys (ij known)	,					
285 Passaic Street, Hack	kensack, NJ 07601									
(201) 282-6500										
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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

certifica	tion to the contrary is filed.
I,is inelig	, counsel for, do hereby certify that the above captioned civil action gible for compulsory arbitration for the following reason(s):
	monetary damages sought are in excess of \$150,000, exclusive of interest and costs.
	the complaint seeks injunctive relief,
	the matter is otherwise ineligible for the following reason
	DISCLOSURE STATEMENT - FEDERAL RULES CIVIL PROCEDURE 7.1
	Identify any parent corporation and any publicly held corporation that owns 10% or more or its stocks:
	identity any parent corporation and any publicly field corporation that owns 10 % of more of its stocks.
	RELATED CASE STATEMENT (Section VIII on the Front of this Form)
to anothe substanti deemed "Presum	ist all cases that are arguably related pursuant to Division of Business Rule 50.3.1 in Section VIII on the front of this form. Rule 50.3.1 (a) provides that "A civil case is "related" er civil case for purposes of this guideline when, because of the similarity of facts and legal issues or because the cases arise from the same transactions or events, a tial saving of judicial resources is likely to result from assigning both cases to the same judge and magistrate judge." Rule 50.3.1 (b) provides that "A civil case shall not be "related" to another civil case merely because the civil case: (A) involves identical legal issues, or (B) involves the same parties." Rule 50.3.1 (c) further provides that ptively, and subject to the power of a judge to determine otherwise pursuant to paragraph (d), civil cases shall not be deemed to be "related" unless both cases are still before the court."
	NY-E DIVISION OF BUSINESS RULE 50.1(d)(2)
1.)	Is the civil action being filed in the Eastern District removed from a New York State Court located in Nassau or Suffolk County? Yes No
2.)	If you answered "no" above: a) Did the events or omissions giving rise to the claim or claims, or a substantial part thereof, occur in Nassau or Suffolk County? Yes No
	b) Did the events or omissions giving rise to the claim or claims, or a substantial part thereof, occur in the Eastern District? Yes No
	c) If this is a Fair Debt Collection Practice Act case, specify the County in which the offending communication was received: Suffolk County
Suffolk	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 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 County? Yes No
Canon	(Note: A corporation shall be considered a resident of the County in which it has the most significant contacts).
	BAR ADMISSION
	I am currently admitted in the Eastern District of New York and currently a member in good standing of the bar of this court.
	✓ Yes □ No
	Are you currently the subject of any disciplinary action (s) in this or any other state or federal court?
	Yes (If yes, please explain No
	I certify the accuracy of all information provided above.
	Signature:

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Last Modified: 11/27/2017

UNITED STATES DISTRICT COURT

for the

Eastern District of New York

Matthew Hochstasser, individually and on behalf of all others similarly situated)))						
Plaintiff(s))						
v.) Civil Action No. 2:18-cv-04024						
Conrad Credit Corporation John Does 1-25))))						
Defendant(s))						
SUMMONS IN	N A CIVIL ACTION						
To: (Defendant's name and address) Conrad Credit Corporatio Attn. Mr. Keith Richenbac 476 W. Vermont Avenue Escondido, CA 92025							
A lawsuit has been filed against you.							
are the United States or a United States agency, or an offi	you (not counting the day you received it) — or 60 days if you icer or employee of the United States described in Fed. R. Civ. Inswer to the attached complaint or a motion under Rule 12 of ion must be served on the plaintiff or plaintiff's attorney,						
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							
Date:	Signature of Clerk or Deputy Clerk						

Civil Action No. 2:18-cv-04024

PROOF OF SERVICE

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

was rec	This summons for (neeived by me on (date)	ame of individual and title, if an	· · · · · · · · · · · · · · · · · · ·								
	☐ I personally serve	ed the summons on the ind		; or							
		on (date)									
	☐ I left the summons at the individual's residence or usual place of abode with (name)										
	, a person of suitable age and discretion who resides there, on (date), and mailed a copy to the individual's last known address; or										
	☐ I served the summ	nons on (name of individual)			, who is						
	designated by law to	o accept service of process	on behalf of (name of organization)		_						
			on (date)	; or							
	☐ I returned the sun	nmons unexecuted because			; or						
	☐ Other (specify):										
	My fees are \$	for travel and \$	for services, for a tota	nl of \$().00 .						
	I declare under pena	lty of perjury that this info	rmation is true.								
Date:											
			Server's signature								
		_	Printed name and title	,							
		_	Server's address								

Additional information regarding attempted service, etc:

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ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: <u>Conrad Credit Corporation Sued Over Allegedly Unlawful Collection Letter</u>