

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

JAMES PARHAM, individually)	
and on behalf of other similarly)	
situated individuals,)	CASE NO.
)	
Plaintiff,)	<u>JURY TRIAL REQUESTED</u>
)	
v.)	
)	
REGIONAL ADJUSTMENT)	
BUREAU, INC.,)	
a Tennessee corporation,)	
)	
Defendant.)	

COMPLAINT

1. This is an action for damages arising under 15 U.S.C. § 1692 *et seq.*, The Fair Debt Collection Practices Act (“FDCPA”), which requires, *inter alia*, a debt collector to make certain statutory disclosures in its initial communication with a consumer, specifically to clearly and accurately identify the name of the creditor.

JURISDICTION AND VENUE

2. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1331 and 15 U.S.C. §1692k(d). The FDCPA is a federal statute. Venue here is

proper under 28 U.S.C. § 1391(b)(2) because a substantial part of the events giving rise to this action occurred here.

PARTIES

3. Plaintiff James Parham (“Plaintiff”) is a natural person who, at all times relevant to this action was a resident of Fulton County, Georgia.

4. Plaintiff, as more fully described herein, is allegedly obligated to pay a personal or household debt to Plaintiff’s “client” and is therefore a consumer within the meaning of 15 U.S.C. § 1692a(3).

5. Defendant Regional Adjustment Bureau, Inc. (“Defendant”) is a Tennessee corporation whose principal office is located at 7830 Goodlett Farms Pkwy, Ste. 100W, Cordova, TN 38106 and whose registered agent for service of process is Robert F. Wyatt, 7830 Goodlett Farms Pkwy, Ste. 100W, Cordova, TN 37106.

6. Defendant regularly uses the mail and telephone in a business the principal purpose of which is the collection of debt. Regional Adjustment Bureau, Inc. is a “debt collector” within the meaning of 15 U.S.C. § 1692a(6).

FACTUAL ALLEGATIONS

7. This action arises from Defendant's attempt to collect from Plaintiff an allegedly "charged off" household or personal debt in the amount of 49,724.07, originating, upon information and belief, from a student loan.

8. In furtherance thereof, Defendant, on or about December 4, 2015, mailed a collection letter to Plaintiff which Plaintiff received shortly thereafter. A true and correct copy is attached hereto as **Exhibit A**.

9. The aforementioned letter was the first communication of any sort between Plaintiff and Defendant and is therefore the "initial communication" as contemplated by 15 U.S.C. § 1692g(a).

10. The letter nowhere states the identity of the current creditor.

11. The Defendant provided, under the heading of "Client Name," an indecipherable and meaningless string of letters and numbers, "**GTAM-STAB SLF-2c-GT-2013.**"

12. While Defendant's client can possibly be the same as the current creditor the client can possibly be a different entity than the creditor. For example, the current creditor can hire a company who is responsible for servicing its account and this servicing company can hire a collection company such as Defendant. In such a case the client would not be the current creditor.

13. Upon information and belief, no such entity named “GTAM-STAB SLF-2c-GT-2013 exists, and even if it does, Plaintiff has never had a creditor by the name of “GTAM-STAB SLF-2c-GT-2013.”

14. Accordingly, the facts here indicate that the Defendant falsely and deceptively obfuscated, and failed to identify the name of the creditor, in violation of the FDCPA.

THE FDCPA

15. The FDCPA, among other things, mandates that, as part of noticing a debt, a “debt collector” must “send the consumer a written notice containing” — along with other information — “the name of the creditor to whom the debt is owed[.]” *Bourff v. Rubin Lublin, LLC*, 674 F.3d 1238 (11th Cir. 2012).

16. More specifically, the FDCPA at § 1692g(a)(2) requires the debt collector to **clearly** identify the name of the creditor to whom the debt is owed. *Lindley v. TRS Recovery Associates, Inc.*, No. 2: 12-CV-109 (S.D. Tex. Dec. 12, 2012) (emphasis added); *Neff v. Schlee v. Stillman, LLC*, No. 16-cv-10555 (E.D. Mich. Aug. 12, 2016). (All that section 1692g(a)(2) requires of the collector is to effectively convey the name of the creditor to whom the debt is owed.)

17. Likewise, the FDCPA at § 1692e(10) prohibits a debt collector from using any false representation or deceptive means to collect or attempt to collect

any debt or to obtain information concerning a consumer. *Thomas v. LDG Financial Services, Inc.*, 463 F. Supp. 2d 1370, 1374 (N.D. Ga. 2006).

18. If the validation notice required under § 1692g(a)(2) does not identify the current creditor clearly and accurately, the law has been violated. A plaintiff need not offer additional evidence of confusion or materiality to prove the violation. *Janetos v Fulton Friedman & Gullace, LLP*, No. 15-1859 (7th Cir. Apr. 7, 2016).

19. The FDCPA is a strict liability statute which provides for actual or statutory damages upon the showing of a single violation. *Bentley v Great Lakes Collection Bureau*, 6 F.3d 60, 62-3 (2d Cir. 1993).

CLASS ALLEGATIONS

20. Defendant holds itself out as “a leader in student loan collection.”¹ Therefore, upon information and belief, Plaintiff submits that the materially same violative form letter which forms the basis of this action has likely been sent to consumers across the country.

21. Therefore, pursuant to Federal Rules of Civil Procedure 23(a) and 23(b)(3), Plaintiff also brings this action on behalf of a class of other similarly situated individuals.

¹ Source: <http://www.rabinc.com/ind-student.htm>. (Accessed Nov. 5, 2016).

22. The class consists of all natural person in the United States to whom Defendant sent, within the time frame relevant to this action (and not returned as undeliverable), an initial communication letter seeking to collect a delinquent student loan, said letter materially similar to Exhibit A in that it failed to clearly and accurately identify the name of the current creditor of the alleged amount due.

23. For purposes of the class definition, the “time frame relevant to this action” is that period of time beginning one year prior to the filing of the original complaint in this action, through and including the date of class certification.

24. The class appears so numerous the joinder of all members is not practicable. On information and belief, there are more than 40 members of the class, including the Plaintiff. *See Cox v. American Cast Iron Pipe Co.*, 784 F.2d 1546, 1553 (11th Cir. 1986) (While there is no fixed numerosity rule, generally less than twenty-one is inadequate, more than forty adequate, with numbers between varying according to other factors. (internal quotations omitted)).

25. There are questions of law and fact common to the class, which common questions predominate over any questions related to individual class members. Here, the predominate question is whether Defendant’s use of an arguably undecipherable string of letters and numbers clearly and accurately identifies the creditor in the manner contemplated by 15 U.S.C. § 1692g(a)(2).

26. Plaintiff's claim is typical of the claims of the class members. All are based on the same factual and legal theories.

27. Plaintiff will fairly and adequately represent the class members. Plaintiff has retained counsel experienced in class actions and FDCPA litigation.

28. A class action is superior to other available methods for the fair and efficient adjudication of the controversy in that:

- a. Individual actions are not economically feasible;
- b. Members of the class are likely unaware of their rights;
- c. Congress intended class actions to be a principal enforcement mechanism under the FCPA.

COUNT I

DEFENDANT'S VIOLATION OF THE FDCPA

29. Plaintiff incorporates by reference all of the above paragraphs of this Complaint as though fully set forth herein.

30. 15 U.S.C. § 1692g(a)(2) requires debt collectors to send consumers written notice containing, inter alia, "the name of the creditor to whom the debt is owed." 15 U.S.C. § 1692g(a)(2).

31. Defendant's initial communication debt collection letter failed to clearly and effectively identify the name of the creditor, violating § 1692g(2).

Also, by using a false representation or deceptive means to obfuscate the name of the creditor, Defendant violated § 1692e(10).

32. Because Defendant's unlawful collection communication fails to comply with one or more provisions of the FDCPA, Defendant is liable to Plaintiff for statutory damages pursuant to 15 U.S.C. § 1692k.

WHEREFORE, Plaintiff respectfully requests this Court enter an Order allowing this action to proceed as a class, followed by entry of judgment in favor of Plaintiff and against Defendant for:

- (1) Statutory damages;
- (2) Attorney's fees, litigation expenses, and costs of this suit;
- (3) Such other and further relief as the Court deems proper.

Dated: Decatur, Georgia
November 11, 2016

The Law Offices of Shimshon Wexler, PC

By: s/ Shimshon Wexler
Shimshon Wexler, Esq.
Attorney for Plaintiff
315 W. Ponce de Leon Ave., Ste. 250
Decatur, Georgia 30030
Tel: (212)760-2400
Fax: (917)512-6132
swexleresq@gmail.com

Plaintiff requests a trial by jury on all issues so triable.

By: /s Shimshon Wexler
Shimshon Wexler, Esq.

EXHIBIT A

ONRABI02
PO Box 1022
Wixom MI 48393-1022

ADDRESS SERVICE REQUESTED

RAB INC

Toll Free
(800) 829-7204

Local Residents
(901) 382-0250

regional adjustment bureau
A Total Receivable Management Company

MAIL ALL CORRESPONDENCE TO:

REGIONAL ADJUSTMENT BUREAU, INC.
PO Box 34111
Memphis TN 38184-0111



JAMES PARHAM
55 Northwood Dr Apt 34
Sandy Springs GA 30342-4644



Date: December 4, 2015
Account #: D-2-5307165
Balance: \$49724.07

Detach Upper Portion and Return with Payment

Client Name: GTAM-STAB SLF-2c-GT-2013
Principal Balance: \$35,838.80
Interest: \$13,885.27
Total Due: \$49,724.07

RAB #: D-2-5307165
Client Account #: XXXXX1000

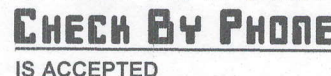
Our client has placed your delinquent account with this office for collection. As of the date of this letter, you owe \$49,724.07. Because of interest that may vary from day to day, the amount due on the day you pay may be greater. Hence, if you pay the amount shown above, an adjustment may be necessary after we receive your payment, in which event we will inform you before depositing your payment for collections.

The total amount of payments since the account was charged off is \$0.00.

It is important that you remit \$49724.07 to avoid further collection efforts. If this is not possible, call our office to make arrangements to clear the balance owed.

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 of 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.

PLEASE NOTE THAT YOU CAN PAY YOUR ACCOUNT BY CHECK OR CREDIT CARD OVER THE INTERNET BY CONTACTING US AT rabinc.com/payment.



This is an attempt to collect a debt and any information obtained will be used for that purpose. This communication is from a debt collector.

See reverse side for important information.

2ONRABI021-747467998



Toll Free
(800) 828-7204
Local Residents
(901) 382-0220

REGIONAL ADJUSTMENT BUREAU, INC.
A Total Receivable Management Company
MAIL ALL CORRESPONDENCE TO:

REGIONAL ADJUSTMENT BUREAU, INC.
PO Box 24111
Memphis, TN 38181-0111

ADDRESS SERVICE REQUESTED
PO Box 1023
Watom WI 48993-1023

Secure online access to your account placed with RAB for collection is now available. Online account access will allow you to **view your balance, see your last payment amount and self-manage resolution of this debt.**

Use the link below to go to the secure login screen where you can enter your personalized username and password. If you have not yet created your username login ID and password, click the New User link located on the login page and enter the information required to create your online account. **Also, be sure to use your private access code provided here when managing your account. Your access code is: 2.2910150.450 Your RAB # is: D-2-5307165**

<https://www.rabincweb.com/facsweb/weblogind.htm>

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

Federal and state laws prohibit certain methods of debt collection and require that we treat you fairly. You can stop us from contacting you by writing a letter to us that tells us to stop. Sending such a letter does not make the debt go away if you owe it. Once we get the letter, we can't contact you again, except to say there won't be any more contact or to tell you that we plan to take a specific action.

If you have a complaint about the way we are collecting your debt, please write to our CONTACT CENTER, Regional Adjustment Bureau, Inc., 1900 Charles Bryan Road, Suite 110, Memphis, TN 38016, email us at complaint@rabinc.com, visit our website at www.rabinc.com/contact.htm or call us toll-free at 866-902-5867 between 9:00 AM and 5:00 PM Central-Time, Monday - Friday.

The Federal Trade Commission enforces the Fair Debt Collection Practices Act. If you have a complaint about the way we are collecting your debt, please contact the FTC online at www.ftc.gov, by phone at 1-877-FTC-HELP; or by mail at 600 Pennsylvania Ave NW, Washington, DC 20580. If you want information about your rights when you are contacted by a debt collector, please contact the FTC online at www.ftc.gov.

CHECK BY PHONE
IS ACCEPTED

This is an attempt to collect a debt and any information obtained will be used for that purpose. This communication is from a debt collector.

Regional Adjustment Bureau, Inc. • 1900 Charles Bryan Rd, Suite 110 • P.O. Box 24111 • Memphis, TN 38016
(800) 828-7204 • (901) 382-0220
Office hours: 9:00 AM - 5:00 PM Monday - Thursday, 9:00 AM - 6:00 PM Friday

JS44 (Rev. 6/16 NDGA)

CIVIL COVER SHEET

The JS44 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 is required for the use of the Clerk of Court for the purpose of initiating the civil docket record. (SEE INSTRUCTIONS ATTACHED)

<p>I. (a) PLAINTIFF(S) JAMES PARHAM, individually and on behalf of other similarly situated individuals</p> <p>(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF <u>FULTON</u> (EXCEPT IN U.S. PLAINTIFF CASES)</p> <p>(c) ATTORNEYS (FIRM NAME, ADDRESS, TELEPHONE NUMBER, AND E-MAIL ADDRESS) The Law Offices of Shimshon Wexler, PC, 315 W Ponce de Leon Ave. Suite 250, Decatur, GA 30030, 212-760-2400, swexleresq@gmail.com</p>	<p>DEFENDANT(S) REGIONAL ADJUSTMENT BUREAU, INC., a Tennessee corporation,</p> <p>COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT _____ (IN U.S. PLAINTIFF CASES ONLY)</p> <p>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED</p> <p>ATTORNEYS (IF KNOWN)</p>
---	---

<p>II. BASIS OF JURISDICTION (PLACE AN "X" IN ONE BOX ONLY)</p> <p><input type="checkbox"/> 1 U.S. GOVERNMENT PLAINTIFF <input checked="" type="checkbox"/> 3 FEDERAL QUESTION (U.S. GOVERNMENT NOT A PARTY)</p> <p><input type="checkbox"/> 2 U.S. GOVERNMENT DEFENDANT <input type="checkbox"/> 4 DIVERSITY (INDICATE CITIZENSHIP OF PARTIES IN ITEM III)</p>	<p>III. CITIZENSHIP OF PRINCIPAL PARTIES (PLACE AN "X" IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT) (FOR DIVERSITY CASES ONLY)</p> <table style="width:100%; border: none;"> <tr> <td style="text-align: center;">PLF</td> <td style="text-align: center;">DEF</td> <td style="text-align: center;">PLF</td> <td style="text-align: center;">DEF</td> <td></td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td>INCORPORATED OR PRINCIPAL PLACE OF BUSINESS IN THIS STATE</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> <td>INCORPORATED AND PRINCIPAL PLACE OF BUSINESS IN ANOTHER STATE</td> </tr> <tr> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td>CITIZEN OR SUBJECT OF A FOREIGN COUNTRY / FOREIGN NATION</td> </tr> </table>	PLF	DEF	PLF	DEF		<input type="checkbox"/> 1	<input type="checkbox"/> 1	<input type="checkbox"/> 4	<input type="checkbox"/> 4	INCORPORATED OR PRINCIPAL PLACE OF BUSINESS IN THIS STATE	<input type="checkbox"/> 2	<input type="checkbox"/> 2	<input type="checkbox"/> 5	<input type="checkbox"/> 5	INCORPORATED AND PRINCIPAL PLACE OF BUSINESS IN ANOTHER STATE	<input type="checkbox"/> 3	<input type="checkbox"/> 3	<input type="checkbox"/> 6	<input type="checkbox"/> 6	CITIZEN OR SUBJECT OF A FOREIGN COUNTRY / FOREIGN NATION
PLF	DEF	PLF	DEF																		
<input type="checkbox"/> 1	<input type="checkbox"/> 1	<input type="checkbox"/> 4	<input type="checkbox"/> 4	INCORPORATED OR PRINCIPAL PLACE OF BUSINESS IN THIS STATE																	
<input type="checkbox"/> 2	<input type="checkbox"/> 2	<input type="checkbox"/> 5	<input type="checkbox"/> 5	INCORPORATED AND PRINCIPAL PLACE OF BUSINESS IN ANOTHER STATE																	
<input type="checkbox"/> 3	<input type="checkbox"/> 3	<input type="checkbox"/> 6	<input type="checkbox"/> 6	CITIZEN OR SUBJECT OF A FOREIGN COUNTRY / FOREIGN NATION																	

IV. ORIGIN (PLACE AN "X" IN ONE BOX ONLY)

1 ORIGINAL PROCEEDING 2 REMOVED FROM STATE COURT 3 REMANDED FROM APPELLATE COURT 4 REINSTATED OR REOPENED 5 TRANSFERRED FROM ANOTHER DISTRICT (Specify District) 6 MULTIDISTRICT LITIGATION - TRANSFER 7 APPEAL TO DISTRICT JUDGE FROM MAGISTRATE JUDGE JUDGMENT

8 MULTIDISTRICT LITIGATION - DIRECT FILE

V. CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE - DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY)

15 USC 1692 et seq.- Violations of the Fair Debt Collection Practices Act for failure to provide information related to their debt.

(IF COMPLEX, CHECK REASON BELOW)

<input type="checkbox"/> 1. Unusually large number of parties.	<input type="checkbox"/> 6. Problems locating or preserving evidence
<input type="checkbox"/> 2. Unusually large number of claims or defenses.	<input type="checkbox"/> 7. Pending parallel investigations or actions by government.
<input type="checkbox"/> 3. Factual issues are exceptionally complex	<input type="checkbox"/> 8. Multiple use of experts.
<input type="checkbox"/> 4. Greater than normal volume of evidence.	<input type="checkbox"/> 9. Need for discovery outside United States boundaries.
<input type="checkbox"/> 5. Extended discovery period is needed.	<input type="checkbox"/> 10. Existence of highly technical issues and proof.

CONTINUED ON REVERSE

FOR OFFICE USE ONLY			
RECEIPT # _____	AMOUNT \$ _____	APPLYING IFP _____	MAG. JUDGE (IFP) _____
JUDGE _____	MAG. JUDGE _____ <i>(Referral)</i>	NATURE OF SUIT _____	CAUSE OF ACTION _____

VI. NATURE OF SUIT (PLACE AN "X" IN ONE BOX ONLY)

CONTRACT - "0" MONTHS DISCOVERY TRACK

- 150 RECOVERY OF OVERPAYMENT & ENFORCEMENT OF JUDGMENT
- 152 RECOVERY OF DEFAULTED STUDENT LOANS (Excl. Veterans)
- 153 RECOVERY OF OVERPAYMENT OF VETERAN'S BENEFITS

CONTRACT - "4" MONTHS DISCOVERY TRACK

- 110 INSURANCE
- 120 MARINE
- 130 MILLER ACT
- 140 NEGOTIABLE INSTRUMENT
- 151 MEDICARE ACT
- 160 STOCKHOLDERS' SUITS
- 190 OTHER CONTRACT
- 195 CONTRACT PRODUCT LIABILITY
- 196 FRANCHISE

REAL PROPERTY - "4" MONTHS DISCOVERY TRACK

- 210 LAND CONDEMNATION
- 220 FORECLOSURE
- 230 RENT LEASE & EJECTMENT
- 240 TORTS TO LAND
- 245 TORT PRODUCT LIABILITY
- 290 ALL OTHER REAL PROPERTY

TORTS - PERSONAL INJURY - "4" MONTHS DISCOVERY TRACK

- 310 AIRPLANE
- 315 AIRPLANE PRODUCT LIABILITY
- 320 ASSAULT, LIBEL & SLANDER
- 330 FEDERAL EMPLOYERS' LIABILITY
- 340 MARINE
- 345 MARINE PRODUCT LIABILITY
- 350 MOTOR VEHICLE
- 355 MOTOR VEHICLE PRODUCT LIABILITY
- 360 OTHER PERSONAL INJURY
- 362 PERSONAL INJURY - MEDICAL MALPRACTICE
- 365 PERSONAL INJURY - PRODUCT LIABILITY
- 367 PERSONAL INJURY - HEALTH CARE/ PHARMACEUTICAL PRODUCT LIABILITY
- 368 ASBESTOS PERSONAL INJURY PRODUCT LIABILITY

TORTS - PERSONAL PROPERTY - "4" MONTHS DISCOVERY TRACK

- 370 OTHER FRAUD
- 371 TRUTH IN LENDING
- 380 OTHER PERSONAL PROPERTY DAMAGE
- 385 PROPERTY DAMAGE PRODUCT LIABILITY

BANKRUPTCY - "0" MONTHS DISCOVERY TRACK

- 422 APPEAL 28 USC 158
- 423 WITHDRAWAL 28 USC 157

CIVIL RIGHTS - "4" MONTHS DISCOVERY TRACK

- 440 OTHER CIVIL RIGHTS
- 441 VOTING
- 442 EMPLOYMENT
- 443 HOUSING/ ACCOMMODATIONS
- 444 WELFARE
- 445 AMERICANS with DISABILITIES - Employment
- 446 AMERICANS with DISABILITIES - Other
- 448 EDUCATION

IMMIGRATION - "0" MONTHS DISCOVERY TRACK

- 462 NATURALIZATION APPLICATION
- 465 OTHER IMMIGRATION ACTIONS

PRISONER PETITIONS - "0" MONTHS DISCOVERY TRACK

- 463 HABEAS CORPUS- Alien Detainee
- 510 MOTIONS TO VACATE SENTENCE
- 530 HABEAS CORPUS
- 535 HABEAS CORPUS DEATH PENALTY
- 540 MANDAMUS & OTHER
- 550 CIVIL RIGHTS - Filed Pro se
- 555 PRISON CONDITION(S) - Filed Pro se
- 560 CIVIL DETAINEE: CONDITIONS OF CONFINEMENT

PRISONER PETITIONS - "4" MONTHS DISCOVERY TRACK

- 550 CIVIL RIGHTS - Filed by Counsel
- 555 PRISON CONDITION(S) - Filed by Counsel

FORFEITURE/PENALTY - "4" MONTHS DISCOVERY TRACK

- 625 DRUG RELATED SEIZURE OF PROPERTY 21 USC 881
- 690 OTHER

LABOR - "4" MONTHS DISCOVERY TRACK

- 710 FAIR LABOR STANDARDS ACT
- 720 LABOR/MGMT. RELATIONS
- 740 RAILWAY LABOR ACT
- 751 FAMILY and MEDICAL LEAVE ACT
- 790 OTHER LABOR LITIGATION
- 791 EMPL. RET. INC. SECURITY ACT

PROPERTY RIGHTS - "4" MONTHS DISCOVERY TRACK

- 820 COPYRIGHTS
- 840 TRADEMARK

PROPERTY RIGHTS - "8" MONTHS DISCOVERY TRACK

- 830 PATENT

SOCIAL SECURITY - "0" MONTHS DISCOVERY TRACK

- 861 HIA (1395ff)
- 862 BLACK LUNG (923)
- 863 DIWC (405(g))
- 863 DIWW (405(g))
- 864 SSID TITLE XVI
- 865 RSI (405(g))

FEDERAL TAX SUITS - "4" MONTHS DISCOVERY TRACK

- 870 TAXES (U.S. Plaintiff or Defendant)
- 871 IRS - THIRD PARTY 26 USC 7609

OTHER STATUTES - "4" MONTHS DISCOVERY TRACK

- 375 FALSE CLAIMS ACT
- 376 Qui Tam 31 USC 3729(a)
- 400 STATE REAPPORTIONMENT
- 430 BANKS AND BANKING
- 450 COMMERCE/ICC RATES/ETC.
- 460 DEPORTATION
- 470 RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS
- 480 CONSUMER CREDIT
- 490 CABLE/SATELLITE TV
- 890 OTHER STATUTORY ACTIONS
- 891 AGRICULTURAL ACTS
- 893 ENVIRONMENTAL MATTERS
- 895 FREEDOM OF INFORMATION ACT
- 899 ADMINISTRATIVE PROCEDURES ACT / REVIEW OR APPEAL OF AGENCY DECISION
- 950 CONSTITUTIONALITY OF STATE STATUTES

OTHER STATUTES - "8" MONTHS DISCOVERY TRACK

- 410 ANTI TRUST
- 850 SECURITIES / COMMODITIES / EXCHANGE

OTHER STATUTES - "0" MONTHS DISCOVERY TRACK

- 896 ARBITRATION (Confirm / Vacate / Order / Modify)

*** PLEASE NOTE DISCOVERY TRACK FOR EACH CASE TYPE. SEE LOCAL RULE 26.3**

VII. REQUESTED IN COMPLAINT:

CHECK IF CLASS ACTION UNDER F.R.Civ.P. 23 DEMAND \$ _____

JURY DEMAND YES NO (CHECK YES ONLY IF DEMANDED IN COMPLAINT)

VIII. RELATED/REFILED CASE(S) IF ANY

JUDGE _____ DOCKET NO. _____

CIVIL CASES ARE DEEMED RELATED IF THE PENDING CASE INVOLVES: (CHECK APPROPRIATE BOX)

- 1. PROPERTY INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
- 2. SAME ISSUE OF FACT OR ARISES OUT OF THE SAME EVENT OR TRANSACTION INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
- 3. VALIDITY OR INFRINGEMENT OF THE SAME PATENT, COPYRIGHT OR TRADEMARK INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
- 4. APPEALS ARISING OUT OF THE SAME BANKRUPTCY CASE AND ANY CASE RELATED THERETO WHICH HAVE BEEN DECIDED BY THE SAME BANKRUPTCY JUDGE.
- 5. REPETITIVE CASES FILED BY PRO SE LITIGANTS.
- 6. COMPANION OR RELATED CASE TO CASE(S) BEING SIMULTANEOUSLY FILED (INCLUDE ABBREVIATED STYLE OF OTHER CASE(S)):

7. EITHER SAME OR ALL OF THE PARTIES AND ISSUES IN THIS CASE WERE PREVIOUSLY INVOLVED IN CASE NO. _____, WHICH WAS DISMISSED. This case IS IS NOT (check one box) SUBSTANTIALLY THE SAME CASE.



SIGNATURE OF ATTORNEY OF RECORD

Nov 11 2016

DATE

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [FDCA Class Action Filed Against Regional Adjustment Bureau](#)
