

Todd M. Friedman (SBN 216752)  
Adrian R. Bacon (SBN 280332)  
LAW OFFICES OF TODD M. FRIEDMAN, P.C.  
21550 Oxnard St., Suite 780  
Woodland Hills, CA 91367  
Phone: 877-206-4741  
Fax: 866-633-0228  
tfriedman@toddfllaw.com  
abacon@toddfllaw.com  
*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

ERIKA PETERSON, individually and ) Case No.  
on behalf of all other similarly situated, )  
Plaintiff, ) **CLASS ACTION**  
vs. ) **COMPLAINT FOR VIOLATIONS**  
CREDIT CORP SOLUTIONS INC., ) **OF:**  
and DOES 1 through 10, inclusive, ) **(1) Federal Fair Debt Collection**  
Defendant. ) **Practices Act [15 U.S.C. § 1692 et**  
 ) **seq.]**  
 ) **(2) Rosenthal Fair Debt Collection**  
 ) **Practices Act [Cal. Civ. § 1788 et seq.]**  
 ) **DEMAND FOR JURY TRIAL**

Plaintiff, ERIKA PETERSON (“Plaintiff”), individually, and on behalf of all others similarly situated, brings this action against Defendant, CREDIT CORP SOLUTIONS INC. (“Defendant”), alleging the following upon information and belief based upon personal knowledge:

1 **INTRODUCTION**

2  
3 1. Plaintiff brings this action, individually and on behalf of all others  
4 similarly situated, for Defendant’s use of deceptive means in connection with  
5 collection of alleged debts in violation of both the Federal Fair Debt Collection  
6 Practices Act, 15 U.S.C. § 1692 *et seq.* (“FDCPA”) and the Rosenthal Fair Debt  
7 Collection Practices Act, Cal. Civ. Code § 1788 *et seq.* (“RFDCPA”).  
8  
9

10 **JURISDICTION & VENUE**

11  
12 2. This Court has original jurisdiction over this matter because it arises  
13 under the laws of the United States. Therefore, Jurisdiction is proper pursuant to  
14 28 U.S.C. § 1331. Furthermore, this Court has supplemental jurisdiction over  
15 Plaintiff’s RFDCPA claim, insofar as it arises under the same facts, pursuant to 28  
16 U.S.C. § 1367(a).  
17  
18

19 3. A substantial part of the events giving rise to this action occurred in  
20 the County of Fresno, California. Venue is therefore proper in the United States  
21 District Court for the Eastern District of California pursuant to 28 U.S.C. §  
22 1391(b)(2).  
23  
24

25 **PARTIES**

26 4. Plaintiff is a natural person residing in Fresno County, California who  
27 allegedly owed or owes a debt and is thereby a “consumer” and a “debtor” under  
28

1 the FDCPA, 15 U.S.C. § 1692a(3) and the RFDCPA, Cal. Civ. Code § 1788.2(h),  
2 respectively.

3  
4 5. At all relevant times herein, Defendant was a company engaged, by  
5 use of mail, in the business of collecting a debt from Plaintiff and others which  
6 qualifies as a “debt” and a “consumer debt” under the FDCPA, 15 U.S.C. §  
7 1692a(5) and the RFDCPA, Cal. Civ. Code § 1788.2(f), respectively. Defendant  
8 regularly attempts to collect debts alleged to be due them or another, and therefore  
9 is a “debt collector” under the FDCPA, 15 U.S.C. § 1692a(6) and the RFDCPA,  
10 Cal. Civ. Code § 1788.2(c).  
11  
12

13  
14 6. The above named Defendant, and its subsidiaries and agents, are  
15 collectively referred to as “Defendants.” The true names and capacities of the  
16 Defendants sued herein as DOES 1 through 10, inclusive, are currently unknown  
17 to Plaintiff, who therefore sues such Defendants by fictitious names. Each of the  
18 Defendants designated herein as a DOE is legally responsible for the unlawful acts  
19 alleged herein. Plaintiff will seek leave of Court to amend the Complaint to reflect  
20 the true names and capacities of the DOE Defendants when such identities become  
21 known.  
22  
23

24  
25 7. Plaintiff is informed and believes that at all relevant times, each and  
26 every Defendant was acting as an agent and/or employee of each of the other  
27 Defendants and was acting within the course and scope of said agency and/or  
28

1 employment with the full knowledge and consent of each of the other Defendants.  
2 Plaintiff is informed and believes that each of the acts and/or omissions complained  
3 of herein was made known to, and ratified by, each of the other Defendants.  
4

5 **FACTUAL ALLEGATIONS**

6 8. Within one year preceding the filing of this complaint, Defendant  
7 contacted Plaintiff regarding an alleged debt.  
8

9 9. On or around November 22, 2016, Defendant sent a letter to Plaintiff  
10 in an attempt to collect an alleged debt originally owed to a third party in the  
11 amount of \$1,303.65.  
12

13 10. In the letter, Defendant stated that “. . .your account has been referred  
14 to our Pre-Legal Department,” thereby implying that legal action has been or will  
15 be taken in connection with collection on the alleged debt.  
16

17 11. In the same letter, Defendant stated that Plaintiff’s alleged debt will  
18 be referred to an attorney unless Plaintiff pays the debt in full, but then Defendant  
19 instructed Plaintiff to contact its “Pre-Legal Department”; however, Defendant  
20 stated that Defendant is not an attorney. Such statements are confusing and give  
21 debtors and consumer such as Plaintiff the impression that Defendant is both an  
22 authority on the law and not an attorney.  
23  
24  
25

26 12. Furthermore, Defendant stated that Plaintiff’s debt “. . .meets  
27 [Defendant’s] legal referral criteria and is eligible to be referred to an attorney”.  
28

1 Such ominous and vague statements give the impression that Defendant has rights  
2 to the debt when such statements are misleading.

3  
4 13. Defendant made misrepresentations as to the nature of the alleged  
5 debt, legal status of the alleged debt, and services rendered in connection with  
6 collection on the alleged debt, among other material misrepresentations.

7  
8 14. Defendant stated that the alleged debt meets requirements for legal  
9 action and then went on to imply that services are or will be rendered on behalf of  
10 Plaintiff for which Plaintiff will be responsible.

11  
12 15. Defendant represented in the letter that Plaintiff was legally obligated  
13 to pay the debt.

14  
15 16. All of Defendant's representations made in the letter were made in  
16 connection with collection on the alleged debt.

17  
18 17. Defendant's letter and subsequent actions lead Plaintiff to feel  
19 confused as to the legal status of the debt, Defendant's rights thereto, and Plaintiff's  
20 obligations.

21  
22 18. Furthermore, Defendant stated in the letter "[i]f you are unable to  
23 make the full payment. . .you should contact out Pre-Legal Department  
24 immediately," thereby giving Plaintiff the impression that full payment of the  
25 alleged debt is unnecessary and that Defendant is amenable to a payment plan.  
26 However, upon contacting Defendant as instructed, Defendant's so-called "Pre-  
27  
28

1 Legal Department” told Plaintiff that it would make no payment arrangement with  
2 Plaintiff and that Plaintiff must either pay the entire alleged debt or Defendant will  
3 take legal action. Therefore, Defendant patently, blatantly, bold-facedly, and  
4 unequivocally misrepresented its intentions in its November 22, 2016 collection  
5 letter to Plaintiff and thereby deceived and misled Plaintiff.  
6

7  
8 19. As a result, and Plaintiff feels deceived, anxious, and harassed.

9  
10 **CLASS ALLEGATIONS**

11 20. Plaintiff brings this action on behalf of himself and all others similarly  
12 situated, as a member of the proposed class (“The Class”) defined as follows:

13 All persons in the United States whom Defendant tried  
14 to contact via mail in an effort to collect an alleged debt  
15 within one (1) year of filing this complaint wherein  
16 Defendant made representations that it the debt will be  
17 sent to an attorney for a lawsuit unless the debt is paid.

18 21. Specifically excluded from the proposed Class are Defendant; any  
19 entities in which Defendant has a controlling interest; and the employees, officers,  
20 directors, affiliates, legal representatives, subsidiaries, and affiliates of Defendant.  
21 The Class’ claims are based on the FDCPA and RFDCPA.  
22

23 22. This action is brought and may be properly maintained as a class  
24 action. This action satisfies the numerosity, typicality, adequacy, predominance  
25 and superiority requirements for a class action.  
26  
27

28 23. Plaintiff and members of The Class were harmed in the same way,

1 namely the following: they were misled by Defendant with respect to the character  
2 and nature of the alleged debts and Defendant's rights with respect thereto, and  
3 they all felt harassed, annoyed, or anxious as a result of Defendant's conduct.  
4

5 24. The Class is so numerous that the individual joinder of all of its  
6 members is impractical. While the exact number and identities of The Class  
7 members are unknown to Plaintiff at this time and can only be ascertained through  
8 appropriate discovery, Plaintiff is informed and believes and thereon alleges that  
9 The Class includes thousands of members. Plaintiff alleges that The Class  
10 members may be ascertained by the records maintained by Defendant.  
11  
12

13 25. Common questions of fact and law exist as to all members of The  
14 Class which predominate over any questions affecting only individual members of  
15 The Class. These common legal and factual questions, which do not vary between  
16 Class members, and which may be determined without reference to the individual  
17 circumstances of any Class members, include, but are not limited to, the following:  
18  
19

- 20
- 21 a. Whether Defendant misrepresented the character or legal status  
22 of debts;
  - 23 b. Whether Defendant threatened legal action that it could not take  
24 or had not intention on taking;
  - 25 c. Whether Defendant used deceptive means in connection with  
26 the collection of debts; and
  - 27 d. The nature and extent of damages and other remedies to which  
28 the conduct of Defendant entitles The Class members.

1  
2 26. Plaintiff is asserting claims that are typical of The Class because every  
3 other member of The Class, like Plaintiff, were exposed to virtually identical  
4 conduct and are entitled to statutory damages up to \$1,000.00 in addition to actual  
5 damages and reasonable attorneys' fees and costs pursuant to the FDCPA and  
6 RFDCPA.  
7

8  
9 27. Plaintiff will fairly and adequately protect the interests of the members  
10 of The Class. Plaintiff has retained attorneys experienced in the prosecution of  
11 class actions.  
12

13 28. A class action is superior to other available methods of fair and  
14 efficient adjudication of this controversy, since individual litigation of the claims  
15 of all Class members is impracticable. Even if every Class member could afford  
16 individual litigation, the court system could not. It would be unduly burdensome  
17 to the courts in which individual litigation of numerous issues would proceed.  
18 Individualized litigation would also present the potential for varying, inconsistent,  
19 or contradictory judgments and would magnify the delay and expense to all parties  
20 and to the court system resulting from multiple trials of the same complex factual  
21 issues. By contrast, the conduct of this action as a class action presents fewer  
22 management difficulties, conserves the resources of the parties and of the court  
23 system, and protects the rights of each Class member.  
24  
25  
26  
27  
28



1           29. The prosecution of separate actions by thousands of individual Class  
2 members would also create the risk of inconsistent or varying adjudications with  
3 respect to, among other things, the need for and the nature of proper disclosures  
4 which Defendant must provide to all Class members when attempting to collect  
5 alleged debts.  
6

7  
8           30. The prosecution of separate actions by individual Class members  
9 would create a risk of adjudications with respect to them that would, as a practical  
10 matter, be dispositive of the interests of the other Class members not parties to such  
11 adjudications or that would substantially impair or impede the ability of such non-  
12 party Class members to protect their interests.  
13

14  
15           31. Defendant has acted or refused to act in respects generally applicable  
16 to The Class, thereby making appropriate final and injunctive relief with regard to  
17 the members of The Class as a whole.  
18

19  
20           **COUNT I: VIOLATION OF FAIR DEBT COLLECTION PRACTICES**

21                           **ACT, 15 U.S.C. § 1692 ET SEQ.**

22                           **(By Plaintiff and The Class)**  
23

24           32. Plaintiff hereby incorporates the preceding paragraphs as if set forth  
25 in full.  
26

27           33. A debt collector may not engage in any conduct the natural  
28 consequences of which is to harass, oppress, or abuse any person in connection

1 with the collection of a debt. 15 U.S.C. § 1692d. By engaging in the above detailed  
2 conduct, Defendant violated this provision of the FDCPA.

3  
4 34. A debt collector may not falsely represent the character, amount or  
5 legal status of any debt in connection with the collection of any debt. 15 U.S.C. §  
6 1692e(2)(A). By engaging in the above detailed conduct, Defendant violated this  
7  
8 provision of the FDCPA.

9  
10 35. A debt collector may not falsely represent services rendered or  
11 compensation which may be lawfully received for collection on the debt. 15 U.S.C.  
12 § 1692e(2)(B). By engaging in the above detailed conduct, Defendant violated this  
13  
14 provision of the FDCPA.

15  
16 36. A debt collector may not unlawfully represent, or represent without  
17 intent to follow through, that nonpayment of any debt will result in the arrest or  
18 imprisonment of any person or seizure, garnishment, attachment, or sale of any  
19 property or wages of any person. 15 U.S.C. § 1692e(4). By engaging in the above  
20  
21 detailed conduct, Defendant violated this provision of the FDCPA.

22  
23 37. A debt collector may not threaten to take erroneous legal action or  
24 threaten legal action without intent to follow through. 15 U.S.C. § 1692e(5). By  
25  
26 engaging in the above detailed conduct, Defendant violated this provision of the  
27  
28 FDCPA.

38. A debt collector may not use false representations or deceptive means,

1 in connection with the collection of any debt. 15 U.S.C. §1692e(10). By engaging  
2 in the above detailed conduct, Defendant violated this provision of the FDCPA.

3  
4 39. As a direct proximate result of Defendant's conduct, Plaintiff and the  
5 Class have suffered actual damages and other harm, thereby entitling them to seek  
6 statutory damages in the amount of \$1,000.00 each, in addition to reasonably  
7 incurred attorney's fees and costs. 15 U.S.C. §1692k(a)(1)-(3).  
8

9  
10 **PRAYER FOR RELIEF**

11 Wherefore, Plaintiff respectfully requests the Court grant Plaintiff and The  
12 Class members the following relief against Defendants, and each of them:  
13

- 14 A. That this action be certified as a class action on behalf of The Class  
15 and Plaintiff be appointed as the representative of The Class;  
16  
17 B. For statutory damages of \$1,000.00 for Plaintiff and each member  
18 of The Class pursuant to 15 U.S.C. § 1692k;  
19  
20 C. For actual damages according to proof;  
21  
22 D. For reasonable attorneys' fees and costs of suit;  
23  
24 E. For prejudgment interest at the legal rate; and  
25  
26 F. For such further relief as this Court deems necessary, just, and  
proper.

27 **COUNT II: VIOLATION OF THE ROSENTHAL FAIR DEBT**  
28 **COLLECTION PRACTICES ACT, CAL. CIV. CODE § 1788 ET SEQ.**

**(By Plaintiff and The Class)**

1  
2  
3 40. Plaintiff hereby incorporates the preceding paragraphs as if set forth  
4 in full.

5  
6 41. Cal. Civ. Code §1788.17 mandates that every debt collector collecting  
7 or attempting to collect a consumer debt shall comply with the provisions of  
8 Sections 1692b to 1692j, inclusive, of, and shall be subject to the remedies in  
9 Section 1692k of, Title 15 of the United States Code statutory regulations contained  
10 within the FDCPA, 15 U.S.C. 1692 et seq.

11  
12  
13 42. Based upon the foregoing, Defendant's conduct violated the RFDCPA  
14 in multiple ways, including but not limited to:

- 15  
16 a) Engaging in any conduct the natural consequences of which  
17 is to harass, oppress, or abuse any person in connection with  
18 the collection of a debt (15 U.S.C. § 1692d);  
19  
20 b) Falsely representing the character or legal status in  
21 connection with collection of a debt (15 U.S.C. §  
22 1692e(2)(A));  
23  
24 c) Falsely representing any services rendered or compensation  
25 which may be lawfully received by any debt collector for  
26 collection on a debt (15 U.S.C. § 1692e(2)(B));  
27  
28

- 1 d) Representing or implying that nonpayment of any debt will  
2 result in the arrest or imprisonment of any person or the  
3 seizure, garnishment, attachment, or sale of any property or  
4 wages of any person unless such action is lawful and the debt  
5 collector intends to follow through (15 U.S.C. § 1692e(4));  
6  
7 e) Threatening to take any action that they cannot legally take  
8 or that they have no intent on taking (15 U.S.C. § 1692e(5));  
9  
10 and  
11  
12 f) Engaging in the use of any false or deceptive representation  
13 or deceptive means to collect or attempt to collect any debt  
14 or to obtain information concerning a consumer (15 U.S.C.  
15 § 1692e(10)).  
16

17  
18 43. Plaintiff alleges that to the extent that Defendant's actions, counted  
19 above, violated the RFDCPA, those actions were done knowingly and willfully.

20  
21 44. As a direct and proximate result of Defendant's violations of  
22 RFDCPA, Plaintiff and the members of The Class have suffered injury, and may  
23 recover from Defendant one thousand dollars (\$1,000.00) in statutory damages in  
24 addition to actual damages and reasonable attorneys' fees and costs pursuant to Cal.  
25 Civ. Code § 1788.30.  
26

27  
28 45. The violations of RFDCPA described herein present a continuing threat

1 to members of The Class and members of the general public in that Plaintiff is  
2 informed and believes and thereon alleges that Defendant continues to engage in  
3 these practices, and will not cease doing so unless and until forced to do so by this  
4 Court.  
5

6  
7 **PRAYER FOR RELIEF**

8 Wherefore, Plaintiff respectfully requests the Court grant Plaintiff and The  
9 Class members the following relief against Defendants, and each of them:  
10

- 11 A. That this action be certified as a class action on behalf of The Class  
12 and Plaintiff be appointed as the representative of The Class;  
13  
14 B. For statutory damages of \$1,000.00 for Plaintiff and each member  
15 of The Class pursuant to 15 U.S.C. § 1692k;  
16  
17 C. For statutory damages of \$1,000.00 for Plaintiff and each member  
18 of The Class pursuant to Cal. Civ. Code § 1788.30;  
19  
20 D. For actual damages according to proof;  
21  
22 E. For reasonable attorneys' fees and costs of suit;  
23  
24 F. For prejudgment interest at the legal rate; and  
25  
26 G. For such further relief as this Court deems necessary, just, and  
27 proper.  
28

**DEMAND FOR JURY TRIAL**



CIVIL COVER SHEET

Case 1:17-cv-00578-LJO-SKO Document 1-1 Filed 04/24/17 Page 1 of 2

The JS 44 civil coversheet 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.)

I. (a) PLAINTIFFS

ERIKA PETERSON, individually and on behalf of all other similarly situated,

(b) County of Residence of First Listed Plaintiff Fresno (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number) Law Offices of Todd M. Friedman, P.C. 21550 Oxnard St. Suite 780, Woodland Hills, CA 91367

DEFENDANTS

CREDIT CORP SOLUTIONS INC., and DOES 1 through 10, inclusive,

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.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff, 2 U.S. Government Defendant, 3 Federal Question (U.S. Government Not a Party), 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, PTF DEF, Incorporated or Principal Place of Business In This State, Incorporated and Principal Place of Business In Another State, Foreign Nation

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Table with 5 columns: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES. Includes various legal categories like Insurance, Personal Injury, Real Property, etc.

V. 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), 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 15 U.S.C. § 1692

Brief description of cause: Violation of the Fair Debt Collection Practices Act

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23, DEMAND \$, CHECK YES only if demanded in complaint: JURY DEMAND: X Yes [ ] No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE, DOCKET NUMBER

DATE: 04/24/2017, SIGNATURE OF ATTORNEY OF RECORD: s/Todd M. Friedman

FOR OFFICE USE ONLY

RECEIPT #, AMOUNT, APPLYING IFP, JUDGE, MAG. JUDGE



## INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

### Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading 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. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

**I. (a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.

(b) County of Residence. For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)

(c) Attorneys. Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".

**II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.C.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.

United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.

United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.

Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.

Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; federal question actions take precedence over diversity cases.)

**III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.

**IV. Nature of Suit.** Place an "X" in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerks in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.

**V. Origin.** Place an "X" in one of the seven boxes.

Original Proceedings. (1) Cases which originate in the United States district courts.

Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.

Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.

Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.

Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.

Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.

Appeal to District Judge from Magistrate Judgment. (7) Check this box for an appeal from a magistrate judge's decision.

**VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.**  
Example: U.S. Civil Statute: 47 USC 553  
Brief Description: Unauthorized reception of cable service

**VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.

Demand. In this space enter the dollar amount (in thousands of dollars) being demanded or indicate other demand such as a preliminary injunction.

Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.

**VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

**Date and Attorney Signature.** Date and sign the civil cover sheet.

# ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Credit Corp Solutions Hit with Lawsuit over 'Vague' Collection Letter](#)

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