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

13 JOGERT ABRANTES, individually)
 14 and on behalf of all others similarly)
 15 situated,)

16 Plaintiff,)

17 vs.)

18 WILLIAMS & FUDGE, INC., and)
 19 DOES 1 through 10, inclusive, and each)
 20 of them)

21 Defendant.)
 22)
 23)
 24)

Case No.

CLASS ACTION

**COMPLAINT FOR VIOLATIONS
 OF:**

1. NEGLIGENT VIOLATIONS OF THE TELEPHONE CONSUMER PROTECTION ACT [47 U.S.C. §227(b)]
2. WILLFUL VIOLATIONS OF THE TELEPHONE CONSUMER PROTECTION ACT [47 U.S.C. §227(b)]

DEMAND FOR JURY TRIAL

25 _____
 26 Plaintiff JOGERT ABRANTES (“Plaintiff”), individually and on behalf of
 27 all others similarly situated, alleges the following upon information and belief
 28 based upon personal knowledge:

1 **NATURE OF THE CASE**

2 1. Plaintiff brings this action individually and on behalf of all others
3 similarly situated seeking damages and any other available legal or equitable
4 remedies resulting from the illegal actions of Defendant, WILLIAMS & FUDGE,
5 INC., (“Defendant”), in negligently, knowingly, and/or willfully contacting
6 Plaintiff on Plaintiff’s cellular telephone in violation of the Telephone Consumer
7 Protection Act, 47 U.S.C. § 227 *et seq.* (“TCPA”), thereby causing Plaintiff to
8 incur unwanted and unnecessary charges and invading Plaintiff’s privacy.

9 **JURISDICTION & VENUE**

10 2. Jurisdiction is proper under 28 U.S.C. § 1332(d)(2) because Plaintiff,
11 a resident of California, seeks relief on behalf of a Class, which will result in at
12 least one class member belonging to a different state than that of Defendant, a South
13 Carolina company. Plaintiff also seeks up to \$1,500.00 in damages for each call in
14 violation of the TCPA, which, when aggregated among a proposed class in the
15 thousands, exceeds the \$5,000,000.00 threshold for federal court jurisdiction.
16 Therefore, both diversity jurisdiction and the damages threshold under the Class
17 Action Fairness Act of 2005 (“CAFA”) are present, and this Court has jurisdiction.

18 3. Venue is proper in the United States District Court for the Eastern
19 District of California pursuant to 28 U.S.C. 1391(b) and because Defendant does
20 business within the State of California and Plaintiff resides within the County of
21 Fresno.

22 **PARTIES**

23 4. Plaintiff, JOGERT ABRANTES (“Plaintiff”), is a natural person
24 residing in Fresno County, California and is a “person” as defined by 47 U.S.C. §
25 153 (39).

26 5. Defendant, WILLIAMS & FUDGE, INC. (“Defendant”), is a student
27 loan financial company, and is a “person” as defined by 47 U.S.C. § 153 (39).

28 6. The above named Defendant, and its subsidiaries and agents, are

1 collectively referred to as “Defendants.” The true names and capacities of the
2 Defendants sued herein as DOE DEFENDANTS 1 through 10, inclusive, are
3 currently unknown to Plaintiff, who therefore sues such Defendants by fictitious
4 names. Each of the Defendants designated herein as a DOE is legally responsible
5 for the unlawful acts alleged herein. Plaintiff will seek leave of Court to amend the
6 Complaint to reflect the true names and capacities of the DOE Defendants when
7 such identities become known.

8 7. Plaintiff is informed and believes that at all relevant times, each and
9 every Defendant was acting as an agent and/or employee of each of the other
10 Defendants and was acting within the course and scope of said agency and/or
11 employment with the full knowledge and consent of each of the other Defendants.
12 Plaintiff is informed and believes that each of the acts and/or omissions complained
13 of herein was made known to, and ratified by, each of the other Defendants.

14 **FACTUAL ALLEGATIONS**

15 8. Beginning in or around September 2017, Defendant contacted
16 Plaintiff on Plaintiff’s cellular telephone number ending in -2428, in an attempt to
17 solicit Plaintiff to purchase Defendants’ services.

18 9. Defendants contacted or attempted to contact Plaintiff from telephone
19 number (803) 326- 1361, confirmed to be Defendant’s number.

20 10. Defendants used an “automatic telephone dialing system” as defined
21 by *47 U.S.C. § 227(a)(1)* to place its calls to Plaintiff seeking to solicit its services.

22 11. Defendant’s calls constituted calls that were not for emergency
23 purposes as defined by *47 U.S.C. § 227(b)(1)(A)*.

24 12. Defendant’s calls were placed to telephone number assigned to a
25 cellular telephone service for which Plaintiff incurs a charge for incoming calls
26 pursuant to *47 U.S.C. § 227(b)(1)*.

27 13. Plaintiff is not a customer of Defendant’s services and has never
28 provided any personal information, including his telephone number, to Defendant

1 for any purpose whatsoever.

2 14. During all relevant times, Defendant did not possess Plaintiff's "prior
3 express consent" to receive calls using an automatic telephone dialing system or an
4 artificial or prerecorded voice on its cellular telephones pursuant to 47 U.S.C. §
5 227(b)(1)(A).

6 15. Defendant placed multiple calls soliciting its business to Plaintiff on
7 its cellular telephones beginning in or around September of 2017 and continuing
8 throughout the next couple months.

9 16. Such calls constitute solicitation calls pursuant to 47 C.F.R. §
10 64.1200(c)(2) as they were attempts to promote or sell Defendant's services.

11 17. Plaintiff received numerous solicitation calls from Defendant within a
12 12-month period.

13 18. Plaintiff requested for Defendant to stop calling Plaintiff during one
14 of the initial calls from Defendant, thus revoking any prior express consent that had
15 existed and terminating any established business relationship that had existed, as
16 defined under 16 C.F.R. 310.4(b)(1)(iii)(B).

17 19. Upon information and belief, and based on Plaintiff's experiences of
18 being called by Defendant after requesting they stop calling, and at all relevant
19 times, Defendant failed to establish and implement reasonable practices and
20 procedures to effectively prevent telephone solicitations in violation of the
21 regulations prescribed under 47 U.S.C. § 227(c)(5).

22 **CLASS ALLEGATIONS**

23 20. Plaintiff brings this action individually and on behalf of all others
24 similarly situated, as a member the two proposed classes (hereafter, jointly, "The
25 Classes"). The class concerning the ATDS claim for no prior express consent
26 (hereafter "The ATDS Class") is defined as follows:

27 All persons within the United States who received any
28 solicitation/telemarketing telephone calls from

1 Defendant to said person's cellular telephone made
2 through the use of any automatic telephone dialing
3 system or an artificial or prerecorded voice and such
4 person had not previously consented to receiving such
5 calls within the four years prior to the filing of this
6 Complaint

7 21. The class concerning the ATDS claim for revocation of consent, to the
8 extent prior consent existed (hereafter "The ATDS Revocation Class") is defined
9 as follows:

10 All persons within the United States who received any
11 solicitation/telemarketing telephone calls from
12 Defendant to said person's cellular telephone made
13 through the use of any automatic telephone dialing
14 system or an artificial or prerecorded voice and such
15 person had revoked any prior express consent to receive
16 such calls prior to the calls within the four years prior to
17 the filing of this Complaint.

18 22. Plaintiff represents, and is a member of, The ATDS Class, consisting
19 of all persons within the United States who received any solicitation telephone calls
20 from Defendant to said person's cellular telephone made through the use of any
21 automatic telephone dialing system or an artificial or prerecorded voice and such
22 person had not previously provided their cellular telephone number to Defendant
23 within the four years prior to the filing of this Complaint.

24 23. Plaintiff represents, and is a member of, The ATDS Revocation Class,
25 consisting of all persons within the United States who received any
26 solicitation/telemarketing telephone calls from Defendant to said person's cellular
27 telephone made through the use of any automatic telephone dialing system or an
28 artificial or prerecorded voice and such person had revoked any prior express
consent to receive such calls prior to the calls within the four years prior to the
filing of this Complaint.

1 24. Defendant, its employees and agents are excluded from The Classes.
2 Plaintiff does not know the number of members in The Classes, but believes the
3 Classes members number in the thousands, if not more. Thus, this matter should
4 be certified as a Class Action to assist in the expeditious litigation of the matter.

5 25. The Classes are so numerous that the individual joinder of all of its
6 members is impractical. While the exact number and identities of The Classes
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 Classes includes thousands of members. Plaintiff alleges that The Classes
10 members may be ascertained by the records maintained by Defendant.

11 26. Plaintiff and members of The ATDS Class and The ATDS Revocation
12 Class were harmed by the acts of Defendant in at least the following ways:
13 Defendant illegally contacted Plaintiff and ATDS Class members via their cellular
14 telephones thereby causing Plaintiff and ATDS Class and ATDS Revocation Class
15 members to incur certain charges or reduced telephone time for which Plaintiff and
16 ATDS Class and ATDS Revocation Class members had previously paid by having
17 to retrieve or administer messages left by Defendant during those illegal calls, and
18 invading the privacy of said Plaintiff and ATDS Class and ATDS Revocation Class
19 members.

20 27. Common questions of fact and law exist as to all members of The
21 ATDS Class which predominate over any questions affecting only individual
22 members of The ATDS Class. These common legal and factual questions, which
23 do not vary between ATDS Class members, and which may be determined without
24 reference to the individual circumstances of any ATDS Class members, include,
25 but are not limited to, the following:

- 26 a. Whether, within the four years prior to the filing of this
27 Complaint, Defendant made any telemarketing/solicitation call
28 (other than a call made for emergency purposes or made with

1 the prior express consent of the called party) to a ATDS Class
2 member using any automatic telephone dialing system or any
3 artificial or prerecorded voice to any telephone number
4 assigned to a cellular telephone service;

5 b. Whether Plaintiff and the ATDS Class members were damaged
6 thereby, and the extent of damages for such violation; and

7 c. Whether Defendant and their agents should be enjoined from
8 engaging in such conduct in the future.

9 28. As a person that received numerous telemarketing/solicitation calls
10 from Defendant using an automatic telephone dialing system or an artificial or
11 prerecorded voice, without Plaintiff's prior express consent, Plaintiff is asserting
12 claims that are typical of The ATDS Class.

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

20 a. Whether, within the four years prior to the filing of this
21 Complaint, Defendant made any telemarketing/solicitation call
22 (other than a call made for emergency purposes or made with
23 the prior express consent of the called party) to an ATDS
24 Revocation Class member, who had revoked any prior express
25 consent to be called using an ATDS, using any automatic
26 telephone dialing system or any artificial or prerecorded voice
27 to any telephone number assigned to a cellular telephone
28 service;

1 b. Whether Plaintiff and the ATDS Revocation Class members
2 were damaged thereby, and the extent of damages for such
3 violation; and

4 c. Whether Defendant and their agents should be enjoined from
5 engaging in such conduct in the future.

6 30. As a person that received numerous telemarketing/solicitation calls
7 from Defendant using an automatic telephone dialing system or an artificial or
8 prerecorded voice, after Plaintiff had revoked any prior express consent, Plaintiff
9 is asserting claims that are typical of The ATDS Revocation Class.

10 31. Plaintiff will fairly and adequately protect the interests of the members
11 of The Classes. Plaintiff has retained attorneys experienced in the prosecution of
12 class actions.

13 32. 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 Classes members is impracticable. Even if every Classes member could
16 afford individual litigation, the court system could not. It would be unduly
17 burdensome to the courts in which individual litigation of numerous issues would
18 proceed. Individualized litigation would also present the potential for varying,
19 inconsistent, or contradictory judgments and would magnify the delay and expense
20 to all parties and to the court system resulting from multiple trials of the same
21 complex factual issues. By contrast, the conduct of this action as a class action
22 presents fewer management difficulties, conserves the resources of the parties and
23 of the court system, and protects the rights of each Classes member.

24 33. The prosecution of separate actions by individual Classes members
25 would create a risk of adjudications with respect to them that would, as a practical
26 matter, be dispositive of the interests of the other Classes members not parties to
27 such adjudications or that would substantially impair or impede the ability of such
28 non-party Class members to protect their interests.

1 34. Defendant have acted or refused to act in respects generally applicable
2 to The Classes, thereby making appropriate final and injunctive relief with regard
3 to the members of the Classes as a whole.

4 **FIRST CAUSE OF ACTION**

5 **Negligent Violations of the Telephone Consumer Protection Act**

6 **47 U.S.C. §227(b).**

7 **On Behalf of the ATDS Class and ATDS Revocation Class**

8 35. Plaintiff repeats and incorporates by reference into this cause of action
9 the allegations set forth above at Paragraphs 1-34.

10 36. The foregoing acts and omissions of Defendant constitute numerous
11 and multiple negligent violations of the TCPA, including but not limited to each
12 and every one of the above cited provisions of *47 U.S.C. § 227(b)*, and in particular
13 *47 U.S.C. § 227 (b)(1)(A)*.

14 37. As a result of Defendant' negligent violations of *47 U.S.C. § 227(b)*,
15 Plaintiff and the Class Members are entitled an award of \$500.00 in statutory
16 damages, for each and every violation, pursuant to *47 U.S.C. § 227(b)(3)(B)*.

17 38. Plaintiff and the ATDS Class and ATDS Revocation Class members
18 are also entitled to and seek injunctive relief prohibiting such conduct in the future.

19
20 **SECOND CAUSE OF ACTION**

21 **Knowing and/or Willful Violations of the Telephone Consumer Protection**

22 **Act**

23 **47 U.S.C. §227(b)**

24 **On Behalf of the ATDS Class and the ATDS Revocation Class**

25 39. Plaintiff repeats and incorporates by reference into this cause of action
26 the allegations set forth above at Paragraphs 1-34.

27 40. The foregoing acts and omissions of Defendant constitute numerous
28 and multiple knowing and/or willful violations of the TCPA, including but not

1 limited to each and every one of the above cited provisions of *47 U.S.C. § 227(b)*,
2 and in particular *47 U.S.C. § 227 (b)(1)(A)*.

3 41. As a result of Defendant' knowing and/or willful violations of *47*
4 *U.S.C. § 227(b)*, Plaintiff and the ATDS Class and ATDS Revocation Class
5 members are entitled an award of \$1,500.00 in statutory damages, for each and
6 every violation, pursuant to *47 U.S.C. § 227(b)(3)(B)* and *47 U.S.C. § 227(b)(3)(C)*.

7 42. Plaintiff and the Class members are also entitled to and seek injunctive
8 relief prohibiting such conduct in the future.

9 **PRAYER FOR RELIEF**

10 WHEREFORE, Plaintiff requests judgment against Defendant for the following:

11 **FIRST CAUSE OF ACTION**

12 **Negligent Violations of the Telephone Consumer Protection Act**

13 **47 U.S.C. §227(b)**

- 14 • As a result of Defendant' negligent violations of *47 U.S.C.*
15 *§227(b)(1)*, Plaintiff and the ATDS Class and ATDS Revocation
16 Class members are entitled to and request \$500 in statutory damages,
17 for each and every violation, pursuant to *47 U.S.C. 227(b)(3)(B)*.
18 • Any and all other relief that the Court deems just and proper.

19
20 **SECOND CAUSE OF ACTION**

21 **Knowing and/or Willful Violations of the Telephone Consumer Protection**
22 **Act**

23 **47 U.S.C. §227(b)**

- 24 • As a result of Defendant' willful and/or knowing violations of *47*
25 *U.S.C. §227(b)(1)*, Plaintiff and the ATDS Class and ATDS
26 Revocation Class members are entitled to and request treble damages,
27 as provided by statute, up to \$1,500, for each and every violation,
28 pursuant to *47 U.S.C. §227(b)(3)(B)* and *47 U.S.C. §227(b)(3)(C)*.

- Any and all other relief that the Court deems just and proper.

JURY DEMAND

43. Pursuant to the Seventh Amendment to the Constitution of the United States of America, Plaintiff is entitled to, and demands, a trial by jury.

Respectfully Submitted this 29th Day of August, 2018.

LAW OFFICES OF TODD M. FRIEDMAN, P.C.

By: /s/ Todd M. Friedman
Todd M. Friedman
Law Offices of Todd M. Friedman
Attorney for Plaintiff

CIVIL COVER SHEET

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.)

I. (a) PLAINTIFFS

JOGERT ABRANTES, individually and on behalf of all others 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; (877) 206-4741

DEFENDANTS

WILLIAMS & FUDGE, INC., and DOES 1 through 10, inclusive, and each of them

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)

Table with columns for Plaintiff (PTF) and Defendant (DEF) citizenship: Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, 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)

Click here for: Nature of Suit Code Descriptions.

Main table for Nature of Suit with categories: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES.

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 - Transfer, 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 47 U.S.C. 227, et seq.

Brief description of cause: Violation of the telephone consumer protections act

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ 5,000,000.00 CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE DOCKET NUMBER

DATE 08/29/2018 SIGNATURE OF ATTORNEY OF RECORD s/Todd M. Friedman

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

Case 1:18-cv-01169-AWI-SAB Document 1-1 Filed 08/29/18 Page 2 of 2
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.Cv.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; **NOTE: 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 there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- 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 – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
 Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- 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 actual dollar amount 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: [TCPA Suit Filed Against Williams & Fudge Over Alleged Telemarketing Calls](#)
