

JS 44 (Rev. 06/17)

CIVIL COVER SHEET

18-cv-649

The JS 44 civil cover sheet and the instructions 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.)

<p>I. (a) PLAINTIFFS SEE ATTACHED SHEET</p> <p>(b) County of Residence of First Listed Plaintiff _____ <i>(EXCEPT IN U.S. PLAINTIFF CASES)</i></p> <p>(c) Attorneys (Firm Name, Address, and Telephone Number) _____</p>	<p>DEFENDANTS SEE ATTACHED SHEET</p> <p style="text-align: right; font-size: 2em; font-weight: bold;">18 649</p> <p>County of Residence of First Listed Defendant _____ <i>(IN U.S. PLAINTIFF CASES ONLY)</i></p> <p>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.</p> <p>Attorneys (If Known) _____</p>
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<p>II. BASIS OF JURISDICTION (Place an "X" in One Box Only)</p> <p><input type="checkbox"/> 1 U.S. Government Plaintiff</p> <p><input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)</p> <p><input type="checkbox"/> 2 U.S. Government Defendant</p> <p><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)</p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th></th> <th>PTF</th> <th>DEF</th> <th></th> <th>PTF</th> <th>DEF</th> </tr> <tr> <td>Citizen of This State</td> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Incorporated or Principal Place of Business In This State</td> <td><input type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td>Citizen of Another State</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Incorporated and Principal Place of Business In Another State</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Foreign Nation</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table>		PTF	DEF		PTF	DEF	Citizen of This State	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Incorporated or Principal Place of Business In This State	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Citizen of Another State	<input type="checkbox"/>	<input type="checkbox"/>	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/>	<input type="checkbox"/>	Citizen or Subject of a Foreign Country	<input type="checkbox"/>	<input type="checkbox"/>	Foreign Nation	<input type="checkbox"/>	<input type="checkbox"/>
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Citizen or Subject of a Foreign Country	<input type="checkbox"/>	<input type="checkbox"/>	Foreign Nation	<input type="checkbox"/>	<input type="checkbox"/>																				

IV. NATURE OF SUIT (Place an "X" in One Box Only) Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<p>PERSONAL INJURY</p> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<p>PERSONAL INJURY</p> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <p>PERSONAL PROPERTY</p> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157
<p>REAL PROPERTY</p> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<p>CIVIL RIGHTS</p> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<p>PRISONER PETITIONS</p> <p>Habeas Corpus:</p> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <p>Other:</p> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<p>LABOR</p> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	<p>PROPERTY RIGHTS</p> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark
			<p>SOCIAL SECURITY</p> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input checked="" type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat/TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
			<p>FEDERAL TAX SUITS</p> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	
		<p>IMMIGRATION</p> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions		

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):
 FCRA 15 U.S.C. § 1681

Brief description of cause: _____

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. **DEMANDS** _____ CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY (See instructions): JUDGE _____ DOCKET NUMBER **FEB 14 2018**

DATE: 02/14/2018 SIGNATURE OF ATTORNEY OF RECORD: *[Signature]*

FOR OFFICE USE ONLY

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

WB

UNITED STATES DISTRICT COURT

18

649

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: SEE ATTACHED SHEET

Address of Defendant: SEE ATTACHED SHEET

Place of Accident, Incident or Transaction: N/A (Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock? (Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a)) Yes [] No [X]

Does this case involve multidistrict litigation possibilities? Yes [] No [X]

RELATED CASE, IF ANY:

Case Number: Judge Date Terminated:

Civil cases are deemed related when yes is answered to any of the following questions:

- 1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court? Yes [] No [X]
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court? Yes [] No [X]
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court? Yes [] No [X]
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual? Yes [] No [X]

CIVIL: (Place [X] in ONE CATEGORY ONLY)

A. Federal Question Cases:

- 1. [] Indemnity Contract, Marine Contract, and All Other Contracts
2. [] FELA
3. [] Jones Act-Personal Injury
4. [] Antitrust
5. [] Patent
6. [] Labor-Management Relations
7. [] Civil Rights
8. [] Habeas Corpus
9. [] Securities Act(s) Cases
10. [] Social Security Review Cases
11. [X] All other Federal Question Cases (Please specify) FCRA 15 U.S.C. § 1681 et seq.

B. Diversity Jurisdiction Cases:

- 1. [] Insurance Contract and Other Contracts
2. [] Airplane Personal Injury
3. [] Assault, Defamation
4. [] Marine Personal Injury
5. [] Motor Vehicle Personal Injury
6. [] Other Personal Injury (Please specify)
7. [] Products Liability
8. [] Products Liability — Asbestos
9. [] All other Diversity Cases (Please specify)

ARBITRATION CERTIFICATION

(Check Appropriate Category)

I, Richard Kim, counsel of record do hereby certify:
[] Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;
[X] Relief other than monetary damages is sought.

DATE: 02/14/18

Attorney-at-Law

202618

Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

FEB 14 2018

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 02/14/18

Attorney-at-Law

202618

Attorney I.D.#

WB

CIVIL COVER SHEET ATTACHMENT

Plaintiff:

Angela Allen, 1801 Ridgeview Court, Parlin, NJ, 08859

Represented by:

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Richard Kim, Esquire
Attorney I.D. No.: 202618
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Centre Square – West Tower
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609.498.7440 (Fax)
kevin@ferraralawgp.com

Defendants:

Trans Union, LLC, 1510 Chester Pike, Crum Lynne, PA 19022

WB

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
CASE MANAGEMENT TRACK DESIGNATION FORM**

Angela Allen, on behalf of herself and all others similarly
situated, Plaintiff

CIVIL ACTION


v.
Trans Union, LLC, Defendant

NO. **18 649**

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) (X)
- (f) Standard Management – Cases that do not fall into any one of the other tracks. ()

<u>02/14/2018</u>		Richard Kim
Date	Attorney-at-law	Attorney for Plaintiff
<u>855-996-6342</u>	<u>855-235-5855</u>	<u>rkim@thekimlawfirmllc.com</u>
Telephone	FAX Number	E-Mail Address

(Civ. 660) 10/02

FEB 14 2018

are not revised based on the results of an investigation and includes information that is supposed to be deleted from consumer files.

4. This failure to adhere to the FCRA results in the dissemination of false information to consumers about the status of their credit reports.

5. Additionally, the continued reporting of the inaccurate information (*i.e.*, failing to remove deleted trade lines) in Plaintiff's credit report have caused Plaintiff and Class Members further concrete harm through the inclusion of false information.

6. Accordingly, on behalf of herself and the Putative Class proposed herein, Plaintiff seeks statutory damages, punitive damages, costs and attorneys' fees, equitable relief, and all other appropriate relief pursuant to the FCRA.

PARTIES

7. Individual and representative Plaintiff Angela Allen is a resident of Parlin, New Jersey. Ms. Allen is a member of the Putative Class defined below and is a consumer as that term is defined by applicable law, including but not limited to the FCRA.

8. Defendant TU is a business entity that regularly conducts business in the Eastern District of Pennsylvania, with a principal place of business located at 1510 Chester Pike, Crum Lynne, Pennsylvania 19022. TU is a "person" as that term is defined by the FCRA.

JURISDICTION AND VENUE

9. Venue is proper in the United States District Court, Eastern District of Pennsylvania, Philadelphia, pursuant to 28 U.S.C. § 1391(b) as Defendant engages in substantial business activity in the district and a substantial part of the events or omissions giving rise to the claim occurred within the district. 28 U.S.C. § 1391(b).

10. TU maintains a principal place of business in the District, does substantial business in the District, and is subject to personal jurisdiction in the District.

FACTUAL ALLEGATIONS

11. TU is one of the “big three” credit reporting agencies and is required to comply with the FCRA. As a credit reporting agency, the United States Congress (“Congress”) has determined that TU and other credit reporting agencies “have assumed a vital role in assembling and evaluating consumer credit and other information.” 15 U.S.C. § 1681(a).

12. If a consumer finds inaccurate information on their credit reports, the FCRA allows that information to be disputed by a consumer. Following a dispute, a credit reporting agency is required to engage in an investigation of the disputed information to determine whether the information is accurate. 15 U.S.C. § 1681i(a).

13. Following the investigation, if information is found to be inaccurate, a credit reporting agency can change a consumer’s credit report by deleting the disputed information when appropriate.

14. However, TU has been issuing contradicting information following consumer disputes. Specifically, TU will report in its investigative results that the disputed trade line is deleted, but provide a consumer disclosure (*i.e.*, credit report) still containing the purportedly deleted information. This wrongdoing violates Section 1681i(a)(6)(B)(ii) of the FCRA, and results in a concrete informational harm by misinforming consumers as to the true status of their consumer report.

15. Indeed, Plaintiff was subject to this very treatment. Plaintiff’s TU credit report contained three different collections account trade lines regarding medical debt that did not belong to her.

16. After Plaintiff disputed the debt with TU, investigative results (the “Investigative Results”) dated September 18, 2017, were sent to Plaintiff, and represented that the medical debt for the three disputed trade lines would be “Deleted” from Ms. Allen’s credit report.

17. Although the Investigative Results stated that the collections accounts would be “Deleted”, the accompanying credit report contradicted the Investigative Results, and two of the three collections accounts remained.

18. The failure of TU to provide Plaintiff with a revised consumer report that is based upon the investigation is the quintessential definition of a concrete informational harm; and violates Section 1681i(a)(6)(B)(ii) of the FCRA.

19. Additionally, the continued reporting of the inaccurate information (*i.e.*, failing to remove deleted trade lines) in Plaintiff’s credit report cause Plaintiff and Class Members further concrete harm through the inclusion of false information.

20. At all times pertinent hereto, Defendant was acting by and through its agents, servants or employees who were acting within the course and scope of their agency or employment, and under the direct supervision and control of the Defendant.

21. At all times pertinent hereto, the conduct of the Defendant, as well as that of its agents, servants or employees, was intentional, willful, reckless, and in grossly negligent disregard for federal and state laws and the rights of the Plaintiff.

22. Because of Defendant’s conduct, the Plaintiff and members of the Putative Class have suffered concrete injuries for which they are entitled relief.

CLASS ACTION ALLEGATIONS

23. Plaintiff asserts his claim in Count One individually and on behalf of the “FCRA Unrevised Consumer Report Class” defined as follows:

FCRA Unrevised Consumer Report Class. All persons within the United States who: (1) disputed the accuracy of any information on a credit report; (2) resulting in Defendant providing notice of the investigation of the dispute that the disputed item would be deleted; and (3) Defendant providing to the person a consumer report still containing the purportedly deleted information.

24. **Numerosity.** The members of the Putative Class are so numerous that the individual joinder of all its members is impracticable. While the exact number and identities of the members of the Putative Class are unknown to Plaintiff at this time, and can only be ascertained through appropriate discovery, Plaintiff is informed and believes that the Putative Class includes thousands of members, which can be ascertained by the records maintained by Defendant.

25. **Typicality.** Plaintiff and members of the Putative Class were harmed by the acts of Defendant in at least the following way: Defendant routinely issued false and unrevised consumer reports despite informing consumers that disputed trade lines were deleted. The FCRA violations suffered by Plaintiff are typical of those suffered by other members of the Putative Class, and Defendant treated Plaintiff consistent with other members of the Putative Class.

26. **Adequacy.** Plaintiff is an adequate representative of the Putative Class. As a person who was informed that the disputed information within her consumer report was deleted but was later provided with a credit report that still contained purportedly deleted information, Plaintiff's interests are aligned with, and are not antagonistic to the interests of the members of the Putative Class. Plaintiff has retained counsel competent and experienced in complex class action litigation.

27. **Commonality.** Common questions of law and fact exist as to all members of the Putative Class and predominate over any questions solely affecting individual members of the Putative Class, including but not limited to:

- a. Whether Defendant issued consumer reports that contained disputed information that was claimed to have been deleted pursuant to Defendant's investigation of the dispute by the consumer;
- b. Whether Defendant's actions violated the FCRA by issuing consumer reports that contained disputed information that was claimed to have been deleted pursuant to Defendant's investigation of the dispute by the consumer;
- c. The proper measure of statutory and punitive damages; and
- d. The proper form of injunctive and declaratory relief.

28. The case is maintainable as a class action under Fed. R. Civ. P. 23(b)(1) because prosecution of actions by or against individual members of the Putative Class would result in inconsistent or varying adjudications and create the risk of incompatible standards of conduct for Defendant. Further, adjudication of each individual Class member's claim as a separate action would potentially be dispositive of the interest of other individuals not a party to such action, impeding their ability to protect their interests.

29. The case is maintainable as a class action under Fed. R. Civ. P. 23(b)(2) because Defendant has acted or refused to act on grounds that apply generally to the Putative Class, so that final injunctive relief or corresponding declaratory relief is appropriate respecting the Class as a whole.

30. Class certification is also appropriate under Fed. R. Civ. P. 23(b)(3) because questions of law and fact common to the Putative Class predominate over any questions affecting only individual members of the Putative Class, and because a class action is superior to other available methods for the fair and efficient adjudication of this litigation. Defendant's conduct described in this Complaint stems from common and uniform policies and practices, resulting in

common violations of the FCRA. Members of the Putative Class do not have an interest in pursuing separate actions against Defendant, as the amount of each Class member's individual claims is small compared to the expense and burden of individual prosecution, and Plaintiff is unaware of any similar pending claims brought against Defendant by any members of the Putative Class on an individual basis. Class certification also will obviate the need for unduly duplicative litigation that might result in inconsistent judgment concerning Defendant's practices. Moreover, management of this action as a class action will not present any likely difficulties. In the interests of justice and judicial efficiency, it would be desirable to concentrate the litigation of all Putative Class member's claims in a single forum

31. Plaintiff intends to provide notice to all members of the Putative Class to the extent required by Rule 23. The name and addresses of the Putative Class members are available from Defendant's records.

CAUSES OF ACTION

COUNT ONE

(Asserted on behalf of Plaintiff and the FCRA Unrevised Consumer Report Class)

Violation of the Fair Credit Reporting Act

15 U.S.C. § 1681 *et seq.*

32. Plaintiff incorporates by reference all other allegations and paragraphs of the Complaint as if set forth herein at length.

33. Plaintiff is a "consumer" as defined by the FCRA.

34. TU is a "person" as defined by the FCRA.

35. Defendant's conduct violates 15 U.S.C. § 1681i(a)(6)(B)(ii) by issuing a consumer reported that is not revised as a result of the Defendant's investigation of a disputed trade line.

36. The foregoing violation was willful. TU knew that it was required to issue revised consumer reports, instead of providing contradicting information to consumers, and acted in deliberate or reckless disregard of its obligations and the rights of Plaintiff and other Class members.

37. Plaintiff and the Class are entitled to statutory damages of not less than \$100 and not more than \$1,000 for each and every one of these violations, pursuant to 15 U.S.C. § 1681n(a)(1)(A).

38. Plaintiff and the Class are entitled to punitive damages for these violations, pursuant to 15 U.S.C. § 1681n(a)(2).

39. Plaintiff and the Class are further entitled to recover their costs and attorneys' fees, pursuant to 15 U.S.C. § 1681n(a)(3).

PRAYER FOR RELIEF

40. WHEREFORE, Plaintiff, on behalf of herself and the Putative Classes, prays for relief as follows:

- a. Determining that the action may proceed as a class action under Rule 23 of the Federal Rules of Civil Procedure;
- b. Designating Plaintiff as class representative and designating Plaintiff's counsel as counsel for the Putative Class;
- c. Issuing proper notice to the Putative Class at Defendant's expense;
- d. Declaring that Defendant violated the FCRA;
- e. Declaring that Defendant acted willfully in deliberate or reckless disregard of Plaintiff's rights and its obligations under the law;
- f. Awarding appropriate equitable relief, including, but not limited to an

- injunction forbidding Defendant from engaging in further unlawful conduct;
- g. Awarding statutory damages and punitive damages as provided by the law;
 - h. Awarding reasonable attorneys' fees and costs as provided under the law; and
 - i. Granting any other relief, in law or equity, as the Court may deem appropriate and just.

DEMAND FOR JURY TRIAL

41. Plaintiff demands trial by jury on all issues so triable.

Respectfully submitted,

THE KIM LAW FIRM, LLC

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Attorneys for Plaintiff Angela Allen

Dated: February 14, 2018

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Class Action Claims Trans Union Fails to Provide Consumers with Revised Reports](#)
