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16 **UNITED STATES DISTRICT COURT**  
17 **SOUTHERN DISTRICT OF CALIFORNIA**

18 **LINDA ALVAREZ, Individually**  
19 **and On Behalf of All Others**  
20 **Similarly Situated,**

21 Plaintiff,

22 v.

23 **CLIENT SERVICES, INC.,**

24 Defendant.

25 Case No.: '18CV0151 BEN BLM

26 **CLASS ACTION**

27 **COMPLAINT FOR DAMAGES AND**  
28 **INJUNCTIVE RELIEF PURSUANT**  
**TO THE TELEPHONE CONSUMER**  
**PROTECTION ACT, 47 U.S.C. § 227**  
***ET SEQ.***

**JURY TRIAL DEMANDED**

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INTRODUCTION

1. Plaintiff LINDA ALVAREZ (“Plaintiff”) brings this Class Action Complaint for damages, injunctive relief, and any other available legal or equitable remedies, resulting from the illegal actions of defendant CLIENT SERVICES, INC. (“Defendant”) in negligently, willfully and knowingly contacting Plaintiff on Plaintiff’s cell phone without consent, in violation of the Telephone Consumer Protection Act, 47 U.S.C. § 227 *et seq.* (“TCPA”), thereby invading Plaintiff’s privacy.
2. Plaintiff alleges as follows upon personal knowledge as to herself and her own acts and experiences, and, as to all other matters, upon information and belief, including investigation conducted by her attorney.
3. The TCPA was designed to prevent calls like the ones described within this Complaint, and to protect the privacy of citizens like Plaintiff. “Voluminous consumer complaints about abuses of telephone technology – for example, computerized calls dispatched to private homes – prompted Congress to pass the TCPA.” *Mims v. Arrow Fin. Servs., LLC*, 132 S. Ct. 740, 744 (2012).
4. In enacting the TCPA, Congress intended to give consumers a choice as to how creditors and telemarketers may call them, and made specific findings that “[t]echnologies that might allow consumers to avoid receiving such calls are not universally available, are costly, are unlikely to be enforced, or place an inordinate burden on the consumer. TCPA, Pub.L. No. 102–243, § 11. Toward this end, Congress found that:

[b]anning such automated or prerecorded telephone calls to the home, except when the receiving party consents to receiving the call or when such calls are necessary in an emergency situation affecting the health and safety of the consumer, is the only effective means of protecting telephone consumers from this nuisance and privacy invasion.

*Id.* at § 12; *see also Martin v. Leading Edge Recovery Solutions, LLC*, 2012 WL 3292838, at\* 4 (N.D. Ill. Aug. 10, 2012) (citing Congressional findings

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1 on TCPA’s purpose).

- 2 5. Congress also specifically found that “the evidence presented to the Congress
- 3 indicates that automated or prerecorded calls are a nuisance and an invasion
- 4 of privacy, regardless of the type of call....” *Id.* at §§ 12-13. *See also, Mims,*
- 5 *132 S. Ct. at 744.*
- 6 6. Plaintiff brings this case as a class action seeking damages for herself and
- 7 others similarly situated.

8 **JURISDICTION AND VENUE**

- 9 7. This court has federal question jurisdiction pursuant to 28 U.S.C. § 1331
- 10 because this case arises out of the TCPA, 47 U.S.C. § 227 *et seq*, which is a
- 11 federal consumer protection law.
- 12 8. Venue is proper before this Court pursuant to 28 U.S.C. § 1391(b)(2) because
- 13 (i) the events giving rise to Plaintiff’s claims occurred in this District; (ii)
- 14 Plaintiff resides in this District; and (iii) Defendant transacts business within
- 15 this District.
- 16 9. Upon information and belief, Defendant regularly and continuously conducts
- 17 business within this district, and thus, personal jurisdiction is established.

18 **PARTIES**

- 19 10. Plaintiff, at all times mentioned herein, is and was a resident of the County of
- 20 San Diego, in the State of California.
- 21 11. Plaintiff is, and at all times mentioned herein was, a “person” as defined by
- 22 47 U.S.C. § 153 (39).
- 23 12. Plaintiff is informed and believes, and thereon alleges, that Defendant is, and
- 24 at all times mentioned herein was, a Missouri corporation, and is a “person”
- 25 as defined by 47 U.S.C. § 153 (39).
- 26 13. Plaintiff alleges that at all times relevant herein Defendant conducted business
- 27 in this judicial district.
- 28

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FACTUAL ALLEGATIONS

14. Sometime prior to December of 2016, Plaintiff allegedly incurred a debt to Bank of America, which was later sold, transferred or assigned to Defendant. As it is irrelevant to this action, Plaintiff currently takes no position as to whether or not this alleged debt was actually owed.

15. Plaintiff was one of thousands of consumers harassed by Defendant to pay an alleged debt.

16. On December 16, 2016, the Law Office of Daniel Shay (“Shay”) with Plaintiff’s authorization and on Plaintiff’s behalf, faxed and mailed cease and desist letters to Bank of America informing it and by proxy Defendant of the following:

[Plaintiff] hereby revokes any prior express consent that may have been given to receive telephone calls, expressively to [Plaintiff’s] cellular telephone, from an Automated Telephone Dialing System or an artificial or pre-recorded voice, as outlined in the Telephone Consumer Protection Act, 47 U.S.C. § 227 *et seq.* and [Plaintiff] also revokes any applicable business relationship.

[Plaintiff] has retained [Shay] to stop creditor harassment and to discharge your claim(s) through bankruptcy. Whether you are an original creditor, or a collector, you must cease and desist all communication with [Plaintiff] as required by Cal. Civ. Code § 1788.17 via 15 U.S.C. 1692...

17. Despite Plaintiff’s and Shay’s request to cease and desist any direct communication with Plaintiff, Defendant called Plaintiff on or about December 20, 2016, at approximately 10:31 a.m. on her cellular phone ending in “8662”.

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- 1 18. Again, on or about December 21, 2016, at approximately 11:49 a.m.,  
2 Defendant called Plaintiff's cellular phone ending with "8662".
- 3 19. Upon information and belief, Defendant made these and other calls to  
4 Plaintiff using an "automatic telephone dialing system" ("ATDS"), as defined  
5 by 47 U.S.C. § 227(a)(1).
- 6 20. Upon information and belief, Defendant's ATDS has the capacity to store or  
7 produce telephone numbers to be called, using a random or sequential number  
8 generator.
- 9 21. On or about December 15, 2016, at or around 9:05 a.m. Defendant called  
10 Plaintiff's cell phone. Upon answering Defendant's call, all Plaintiff heard  
11 was silence, prompting Plaintiff to abandon the call.
- 12 22. At all material times hereto, Defendant did not have a "prior express consent"  
13 to place autodialed calls to Plaintiff's cellular telephone, pursuant to 47  
14 U.S.C. § 227 (b)(1)(A).
- 15 23. Plaintiff had never given Defendant any consent to receive calls on her  
16 cellular phone, pursuant to 47 U.S.C. § 227 (b)(1)(A).
- 17 24. Furthermore, if any prior express consent was ever given, it was effectively  
18 revoked through Shay's and Plaintiff's facsimile and mailed correspondence  
19 on December 16, 2016.
- 20 25. Through the unwanted calls from Defendant, Plaintiff suffered an invasion of  
21 her legally protected interest in privacy, which is specifically addressed and  
22 protected by the TCPA.
- 23 26. Plaintiff was personally affected because she was frustrated and distressed  
24 that Defendant contacted her cell phone, without any prior consent and  
25 despite Plaintiff's and Shay's specifically requesting that Defendant cease all  
26 direct communications with Plaintiff.
- 27 27. Upon information and belief, the telephone equipment used by Defendant to  
28 place the calls at issue has the capacity to dial telephone numbers

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1 automatically from a stored list or database without human intervention, using  
2 a random or sequential number generator in violation of the TCPA.

3 28. Defendant’s calls constituted calls that were not made for emergency  
4 purposes, as defined by 47 U.S.C. § 227(b)(1)(A).

5 29. Defendant’s calls were placed to a telephone number assigned to a cell phone  
6 service for which Plaintiff incurs a charge for incoming calls pursuant to 47  
7 U.S.C. § 227(b)(1).

8 30. Plaintiff was personally affected by Defendant’s aforementioned conduct  
9 because Plaintiff was frustrated and distressed that Defendant interrupted  
10 Plaintiff with unwanted calls using an ATDS.

11 31. Defendant’s persistent calls forced Plaintiff and other similarly situated class  
12 members to live without the utility of their cell phones by occupying their cell  
13 phones with one or more unwanted calls, causing a nuisance and lost time.

14 32. Plaintiff is informed and believes and here upon alleges, that the calls were  
15 made by Defendant and/or Defendant’s agent(s), with Defendant’s  
16 permission, knowledge, control, and for Defendant’s benefit.

17 33. Through the aforementioned conduct, Defendant or its agent(s) has violated  
18 47 U.S.C. § 227(b)(1).

19 **CLASS ACTION ALLEGATIONS**

20 34. Plaintiff brings this action on behalf of herself and on behalf of all others  
21 similarly situated (the “Class”).

22 35. Plaintiff represents, and is a member of the Class, consisting of:

23 All persons within the United States who received any  
24 telephone call from Defendant or its agent/s and/or  
25 employee/s, not sent for emergency purposes, to said  
26 person’s cellular telephone made through the use of any  
27 automatic telephone dialing system and/or with an  
28 artificial or prerecorded voice within the four years prior  
to the filing of this Complaint.

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

5 37. Plaintiff and members of the Class were harmed by the acts of Defendant in at  
6 least the following ways: Defendant, either directly or through their agents,  
7 illegally contacted Plaintiff and the Class members via their cell phones by  
8 using an ATDS, thereby causing Plaintiff and the Class members to incur  
9 certain cell phone charges or reduce cell phone time for which Plaintiff and  
10 the Class members previously paid, and invading the privacy of said Plaintiff  
11 and the Class members. Plaintiff and the Class members were damaged  
12 thereby.

13 38. This suit seeks only damages and injunctive relief for recovery of economic  
14 injury on behalf of the Class, and it expressly is not intended to request any  
15 recovery for personal injury and claims related thereto. Plaintiff reserves the  
16 right to expand the Class definition to seek recovery on behalf of additional  
17 persons as warranted as facts are learned in further investigation and  
18 discovery.

19 39. **Numerosity.** The joinder of the Class members is impractical and the  
20 disposition of their claims in the Class action will provide substantial benefits  
21 both to the parties and to the court. The Class can be identified through  
22 Defendant's records or Defendant's agents' records.

23 40. **Existence and Predominance of Common Questions of Law and Fact.**  
24 There is a well-defined community of interest in the questions of law and fact  
25 involved affecting the parties to be represented. The questions of law and fact  
26 to the Class predominate over questions which may affect individual Class  
27 members, including the following:  
28

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- 1 a) Whether, within the four years prior to the filing of this Complaint,
- 2 Defendant or their agents initiated any telephonic communications to
- 3 the Class (other than a message made for emergency purposes or
- 4 made with the prior express consent of the called party) using any
- 5 automatic dialing system or prerecorded voice to any telephone
- 6 number assigned to a cell phone service;
- 7 b) Whether Defendant can meet its burden of showing Defendant
- 8 obtained prior express written consent;
- 9 c) Whether Defendant’s conduct was knowing and/or willful;
- 10 d) Whether Plaintiff and the Class members were damaged thereby, and
- 11 the extent of damages for such violation; and
- 12 e) Whether Defendant and their agents should be enjoined from
- 13 engaging in such conduct in the future.

14 41. **Typicality.** As a person that received at least one telephonic communication  
15 from Defendant’s ATDS without Plaintiff’s prior express consent, Plaintiff is  
16 asserting claims that are typical of the Class. Plaintiff will fairly and  
17 adequately represent and protect the interests of the Class in that Plaintiff has  
18 no interests antagonistic to any member of the Class.

19 42. Plaintiff and the members of the Class have all suffered irreparable harm as a  
20 result of Defendant’s unlawful and wrongful conduct. Absent a class action,  
21 the Class will continue to face the potential for irreparable harm. In addition,  
22 these violations of law will be allowed to proceed without remedy and  
23 Defendant will likely continue such illegal conduct. Because of the size of  
24 the individual Class member’s claims, few, if any, Class members could  
25 afford to seek legal redress for the wrongs complained of herein.

26 43. **Adequacy of Representation.** Plaintiff will fairly and adequately represent  
27 and protect the interests of other members of the Class in that Plaintiff has no  
28 interests antagonistic to any member of the Class. Further, Plaintiff has



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1 retained counsel experienced in handling class action claims and claims  
2 involving violations of the Telephone Consumer Protection Act.

3 44. **Superiority.** A class action is a superior method for the fair and efficient  
4 adjudication of this controversy. Class-wide damages are essential to induce  
5 Defendant to comply with federal and California law. The interest of Class  
6 members in individually controlling the prosecution of separate claims against  
7 Defendant is small because the maximum statutory damages in an individual  
8 action for violation of privacy are minimal. Management of these claims is  
9 likely to present significantly fewer difficulties than those presented in many  
10 class claims.

11 45. Defendant has acted on grounds generally applicable to the Class, thereby  
12 making appropriate final injunctive relief and corresponding declaratory relief  
13 with respect to the Class as a whole.

14 **FIRST CAUSE OF ACTION**  
15 **NEGLIGENT VIOLATIONS OF THE TCPA**  
16 **47 U.S.C. § 227 ET SEQ.**

17 46. Plaintiff incorporates by reference all of the above paragraphs of this  
18 Complaint as though fully stated herein.

19 47. The foregoing acts and omissions of Defendant constitute numerous and  
20 multiple negligent violations of the TCPA, including but not limited to each  
21 and every one of the above-cited provisions of 47 U.S.C. § 227, *et seq.*

22 48. As a result of Defendant’s negligent violations of 47 U.S.C. § 227, *et seq.*,  
23 Plaintiff and the Class are entitled to an award of \$500.00 in statutory  
24 damages, for each and every violation, pursuant to 47 U.S.C. § 227(b)(3)(B).

25 49. Plaintiff and the Class are also entitled to and seek injunctive relief  
26 prohibiting such conduct in the future.

27 ///

28 ///

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**SECOND CAUSE OF ACTION**

**KNOWING AND/OR WILLFUL VIOLATIONS OF THE TCPA**

**47 U.S.C. § 227 ET SEQ.**

50. Plaintiff incorporates by reference all of the above paragraphs of this Complaint as though fully stated herein.

51. The foregoing acts and omissions of Defendant constitute numerous and multiple knowing and/or willful violations of the TCPA, including but not limited to each and every one of the above-cited provisions of 47 U.S.C. § 227, *et seq.*

52. As a result of Defendant’s knowing and/or willful violations of 47 U.S.C. § 227, *et seq.*, Plaintiff and the Class are entitled to an award of \$1,500.00 in statutory damages, for each and every violation, pursuant to 47 U.S.C. § 227(b)(3)(B) and 47 U.S.C. § 227(b)(3)(C).

53. Plaintiff and the Class are also entitled to and seek injunctive relief prohibiting such conduct in the future.

**PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff and the Class members pray for judgment as follows against Defendant:

- Certify the Class as requested herein;
- Appoint Plaintiff to serve as the Class Representative in this matter;
- Appoint Plaintiff’s Counsel as Class Counsel in this matter;
- Providing such further relief as may be just and proper.

In addition, Plaintiff and the Class members pray for further judgment as follows against Defendant:

**NEGLIGENT VIOLATION OF  
THE TCPA, 47 U.S.C. § 227 ET SEQ.**

- As a result of Defendant’s negligent violations of 47 U.S.C. § 227(b)(1), Plaintiff seeks for herself and each Class member \$500.00 in statutory

1 damages, for each and every violation, pursuant to 47 U.S.C.  
2 § 227(b)(3)(B);

- 3 • Pursuant to 47 U.S.C. § 227(b)(3)(A), injunctive relief prohibiting such
- 4 conduct in the future;
- 5 • Any other relief the Court may deem just and proper.

6 **KNOWING/WILLFUL VIOLATION OF**  
7 **THE TCPA, 47 U.S.C. § 227 ET SEQ.**

- 8 • As a result of Defendant’s knowing and/or willful violations of 47 U.S.C.
- 9 § 227(b)(1), Plaintiff seeks for herself and each Class member \$1,500.00
- 10 in statutory damages, for each and every violation, pursuant to 47 U.S.C.
- 11 § 227(b)(3)(B);
- 12 • Pursuant to 47 U.S.C. § 227(b)(3)(A), injunctive relief prohibiting such
- 13 conduct in the future;
- 14 • Any other relief the Court may deem just and proper.

15 **TRIAL BY JURY**

16  
17 54. Pursuant to the seventh amendment to the Constitution of the United States of  
18 America, Plaintiff is entitled to, and demand, a trial by jury.

19  
20 Dated: January 22, 2018

21 Respectfully submitted,

22 **HYDE AND SWIGART, APC**

23 By: s/ Yana A. Hart

24 YANA A. HART, ESQ.

25 YANA@WESTCOASTLITIGATION.COM

26 ATTORNEY FOR PLAINTIFF

27  
28  
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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

Linda Alvarez, Individually and On Behalf of All Others Similarly Situated

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

(c) Attorneys (Firm Name, Address, and Telephone Number)

Yana A. Hart, Esq. Hyde & Swigart (619) 233-7770 2221 Camino Del Rio S., Ste 101, San Diego, CA 92108

DEFENDANTS

Client Services, Inc.

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)

'18CV0151 BEN BLM

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

- 1 U.S. Government Plaintiff
3 Federal Question (U.S. Government Not a Party)
2 U.S. Government Defendant
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
1 1 Incorporated or Principal Place of Business In This State
2 2 Incorporated and Principal Place of Business In Another State
3 3 Foreign Nation
4 4
5 5
6 6

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 Estate, 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
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): 47 U.S.C. §227 et seq. ("TCPA")

Brief description of cause: Defendant violated Telephone Consumer Protection 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 01/23/2018 SIGNATURE OF ATTORNEY OF RECORD s/ Yana A. Hart

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

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**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 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 clerk(s) 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 six 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.
- 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: [Lawsuit: Client Services Ignored Consumer's Attorney, Harassed Her with Robocalls](#)

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