

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION**

SANDRA BAZILE, on behalf of herself and all
others similarly situated,

Plaintiff,

vs.

Case No.: 1:18-cv-00864

ACCOUNT CONTROL SYSTEMS, INC., a
New Jersey Corporation,

Defendant.

**CLASS ACTION COMPLAINT FOR VIOLATIONS OF THE FAIR DEBT
COLLECTION PRACTICES ACT AND DEMAND FOR JURY TRIAL**

Plaintiff, SANDRA BAZILE, on behalf of herself and all others similarly situated, by way of this Class Action Complaint against Defendants, ACCOUNT CONTROL SYSTEMS, INC., (“ACS”), by and through her attorneys, says:

I. PRELIMINARY STATEMENT

1. Plaintiff, on her own behalf and on behalf of the class she seeks to represent, brings this action for the illegal practices of ACS who, *inter alia*, used false, deceptive, and misleading practices, and other illegal practices, in connection with its attempts to collect an alleged debt from Plaintiff and other similarly situated Wisconsin consumers.

2. Plaintiff alleges that Defendant’s collection practices violate the Fair Debt Collection Practices Act (FDCPA), 15 U.S.C. § 1692, *et seq.*

3. The FDCPA regulates the behavior of collection agencies attempting to collect a debt on behalf of another. The U.S. Congress, finding evidence of the use of abusive, deceptive, and unfair debt collection practices by many debt collectors, determined that abusive debt collection practices contribute to a number of personal bankruptcies, marital instability, loss of

jobs, and invasions of individual privacy. Congress enacted the FDCPA to eliminate abusive debt collection practices by debt collectors, to ensure that those debt collectors who refrain from using abusive debt collection practices are not competitively disadvantaged, and to promote uniform State action to protect consumers against debt collection abuses. 15 U.S.C. § 1692.

4. The FDCPA is a strict liability statute, which provides for actual or statutory damages upon the showing of one violation. The Seventh Circuit has held that whether a debt collector's conduct violates the FDCPA should be judged from the standpoint of the "unsophisticated debtor." *Gammon v. GC Servs. Ltd. P'ship*, 27 F.3d 1254, 1257 (7th Cir. 1994).

5. To prohibit deceptive practices, the FDCPA, at 15 U.S.C. § 1692e, outlaws the use of false, deceptive, and misleading collection letters and names a non-exhaustive list of certain *per se* violations of false and deceptive collection conduct. 15 U.S.C. § 1692e(1)-(16). Among the *per se* violations prohibited by that section are: making a false representation of the character, amount, or legal status of any debt, 15 U.S.C. § 1692e(2)(A); and, using any false representation or deceptive means to collect or attempt to collect any debt or to obtain information concerning a consumer, 15 U.S.C. § 1692e(10).

6. Furthermore, the FDCPA, at 15 U.S.C. § 1692g, requires that certain information as to the validation of a debt be provided in a collection letter. 15 U.S.C. § 1692g(a)-(e). Among the *per se* violations prohibited by that section are: failing to provide the name of the creditor to whom the debt is owed, 15 U.S.C. § 1692g(a)(2).

7. Plaintiff, on behalf of herself and all others similarly situated, seeks statutory damages, actual damages, punitive damages, declaratory relief, attorney fees, costs, and all other relief, equitable or legal in nature, as deemed appropriate by this Court, pursuant to the FDCPA, and all other common law or statutory regimes.

II. PARTIES

8. Plaintiff is a natural person.

9. At all times relevant to this lawsuit, Plaintiff is a citizen of, and resides in, the Village of Gresham, Shawano County, Wisconsin.

10. At all times relevant to this complaint, ACS is a for-profit Corporation existing pursuant to the laws of the State of New Jersey.

11. ACS maintains its principal business address at 85 Chestnut Ridge Road, Suite 113, Montvale, New Jersey.

III. JURISDICTION & VENUE

12. Jurisdiction of this Court arises under 15 U.S.C. § 1692k(d) and 28 U.S.C. §§ 1331 and 1337.

13. Venue is appropriate in this federal district pursuant to 28 U.S.C. §1391(b) because a substantial part of the events giving rise to Plaintiff's claims occurred within this federal judicial district, and because ACS is subject to personal jurisdiction in the State of Wisconsin at the time this action is commenced.

IV. FACTS

14. ACS regularly collects, and attempts to collect, defaulted debts incurred, or alleged to have been incurred, for personal, family, or household purposes on behalf of creditors using the U.S. Mail, telephone, and Internet.

15. By letter dated June 7, 2017 ("Letter"), ACS attempted to collect from Plaintiff an allegedly defaulted financial obligation that arose out of a transaction in which the money, property, insurance, or services which were the subject of the transaction were incurred for personal, family, and household purposes.

16. A true copy of the Letter is attached as *Exhibit A* except that the undersigned counsel has, in accordance with Fed. R. Civ. P. 5.2, partially redacted the financial account

numbers to protect Plaintiff's privacy.

17. On information and belief, ACS obtained the financial obligation ("Debt") described in *Exhibit A* for collection purposes after the Debt was in default.

18. *Exhibit A* is the initial letter Plaintiff received from ACS regarding the Debt.

19. On information and belief, *Exhibit A* is a computer-generated, template form that ACS uses as the initial letter it sends consumers to collect debts.

20. *Exhibit A* does not unambiguously identify the name of the creditor of the debt ACS is collecting.

21. *Exhibit A* does not unambiguously identify the name of the creditor of the "account" ACS is collecting.

22. *Exhibit A* does not unambiguously identify the name of the creditor who "listed" the "account" with ACS for collection purposes.

23. *Exhibit A* fails to identify the name of the entity to whom the alleged Debt ACS was collecting is owed.

24. *Exhibit A* instructs the consumer to make their payments payable only to ACS.

25. *Exhibit A* instructs the consumer to remit their payments only to ACS.

26. *Exhibit A* only provides instructions for the consumer to communicate with ACS regarding the alleged Debt.

27. The Letter deprived Plaintiff of truthful, non-misleading, information in connection with ACS's attempt to collect a debt.

V. POLICIES AND PRACTICES COMPLAINED OF

28. It is Defendants' policy and practice to engage in unfair and deceptive acts and practices, in violation of 15 U.S.C. §§ 1692e and 1692g by sending letters, such as *Exhibit A*, which seek to collect defaulted debts that violate the FDCPA.

VI. CLASS ALLEGATIONS

29. This action is brought as a class action. Plaintiff brings this action on behalf of herself and on behalf of all other persons similarly situated pursuant to Rule 23 of the Federal Rules of Civil Procedure.

30. Plaintiff seeks to certify a class pursuant to Fed. R. Civ. P. 23(a) and (b)(3).

31. This claim is brought on behalf of a Class of all persons to whom ACS mailed a written communication that was not returned as undeliverable, to an address in the State of Wisconsin, during the period of June 7, 2017 through June 28, 2018, in an attempt to collect a defaulted account, which states: (i) “CURRENT CREDITOR(S) ORIGINAL CREDITOR(S)” and lists at least two different names underneath; and (ii) states “[t]his account has been listed with our office for collection.”

32. The identities of the Class members are readily ascertainable from ACS’s business records.

33. The Class claims include all claims Class members may have for a violation of the FDCPA based on a letter from ACS, such as *Exhibit A*, which seek to collect defaulted debts.

34. This action has been brought, and may properly be maintained, as a class action pursuant to the provisions of Rule 23 of the Federal Rules of Civil Procedure because there is a well-defined community interest in the litigation:

- (a) **Numerosity:** On information and belief that Class is so numerous that joinder of all members would be impractical and includes at least 40 members.
- (b) **Common Questions Predominate:** Common questions of law and fact exist as to all members of the Class and those questions predominate over any questions or issues involving only individual class members. With

respect to the Class, the principal issues are whether ACS's written communications to Wisconsin consumers, such as *Exhibit A*, violate 15 U.S.C. §§ 1692e, 1692e(2), 1692e(10), and 1692g(a)(2).

- (c) **Typicality:** Plaintiff's claims are typical of Class members' claims. Plaintiff and all Class members have claims arising from ACS's common course of conduct complained of herein.
- (d) **Adequacy:** Plaintiff will fairly and adequately protect the interests of the Class members insofar as Plaintiff has no interests that are averse to, or conflict with, absent Class members. Plaintiff is committed to vigorously litigating this matter. Plaintiff has also retained counsel experienced in handling consumer lawsuits, complex legal issues, and class actions. Neither Plaintiff nor her counsel have any interests which might cause them not to vigorously pursue the instant class action lawsuit.

35. Certification of a class under Rule 23(b)(3) of the Federal Rules of Civil Procedure is appropriate in that the questions of law and fact common to members of the Class predominate over any questions affecting an individual member, and a class action is superior to other available methods for the fair and efficient adjudication of the controversy.

36. Based on discovery and further investigation (including, but not limited to, ACS's disclosure of class size and net worth), Plaintiff may, in addition to moving for class certification using modified definitions of the class, class claims, and the class period, and/or seek class certification only as to particular issues as permitted under Fed. R. Civ. P. 23(c)(4). Such modified definitions may be more expansive to include/exclude consumers from the foregoing definitions.

**VII. FIRST CAUSE OF ACTION
VIOLATIONS OF THE FAIR DEBT COLLECTION PRACTICES ACT**

37. Plaintiff realleges and incorporates by reference the allegations in the preceding paragraphs of this Complaint.

38. ACS is a “debt collector” as defined by 15 U.S.C. § 1692a(6).

39. The Letter is a “communication” as defined by 15 U.S.C. § 1692a(2).

40. The Debt is a “debt” as defined by 15 U.S.C. §1692a(5).

41. Plaintiff is a “consumer” as defined by 15 U.S.C. § 1692a(3).

42. The Letter was mailed to Plaintiff to collect the Debt.

43. The Letter deprived Plaintiff of truthful, non-misleading, information in connection with ACS’s attempt to collect a debt.

44. ACS’s use of the Letter violated the FDCPA in one or more following ways:

- (a) Using false, deceptive, and misleading representations or means in connection with the collection of any debt in violation of 15 U.S.C. § 1692e including, but not limited to, violations of §§ 1692e(2), 1692e(5), 1692e(10); and
- (b) Failing to identify the name of the creditor to whom the debt is owed in violation of 15 U.S.C. § 1692g(a)(2).

VIII. PRAYER FOR RELIEF

45. WHEREFORE, Plaintiff respectfully requests the Court enter judgment in her favor and in favor of the Class and against as follows:

A. For the FIRST CAUSE OF ACTION:

- (i) An order certifying that the First Cause of Action may be maintained as a class pursuant to Rule 23 of the Federal Rules of Civil Procedure including, but not limited to, defining the Class, the class claims, appointing Plaintiff as the class

representative, and the undersigned counsel to represent the Class;

- (ii) An award of actual damages for Plaintiff and the Class pursuant to 15 U.S.C. § 1692k(a)(1);
- (iii) An award of statutory damages for Plaintiff and the Class pursuant to 15 U.S.C. § 1692k(a)(2)(B);
- (iv) An incentive award for Plaintiff, to be determined by the Court, for Plaintiff's services to the Class;
- (v) Attorney's fees, litigation expenses, and costs pursuant to 15 U.S.C. § 1692k(a)(3); and
- (vi) For such other and further relief as may be just and proper.

IX. JURY DEMAND

Plaintiff hereby demands that this case be tried before a Jury.

s/ Andrew T. Thomasson

Philip D. Stern (NJ Bar # 045921984)
Andrew T. Thomasson (NJ Bar # 048362011)
STERN•THOMASSON LLP
150 Morris Avenue, 2nd Floor
Springfield, NJ 07081-1315
Telephone: (973) 379-7500
Facsimile: (973) 532-5868
E-Mail: philip@sternthomasson.com
E-Mail: andrew@sternthomasson.com

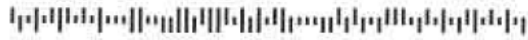
Attorneys for Plaintiff, Sandra Bazile

Exhibit A

85 CHESTNUT RIDGE RD SUITE 113
MONTVALE NJ 07645-1827
Telephone's : (201) 767-5300
(800) 482-8026
Fax : (201) 767-7051

ACCOUNT CONTROL SYSTEMS, INC.
D.B.A. - A.C.S. 148
IN TEXAS AND NEW HAMPSHIRE

ACS Account No. : [REDACTED] 8999	Total Due : \$ 605.45
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S-SDACCS10 L-124
P71ACT00G05300 -519038438 (09135)

SANDRA BAZILE
[REDACTED]
GRESHAM WI 54128-9121



ACCOUNT CONTROL SYSTEMS, INC.
85 CHESTNUT RIDGE RD SUITE 113
MONTVALE NJ 07645-1827

Jun 7, 2017

✕ Detach Upper Portion And Return With Payment ✕

ACS ACCOUNT NO. : [REDACTED] 8999
TOTAL DUE : \$ 605.45

Dear SANDRA BAZILE,

This account has been listed with our office for collection.

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of this debt or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days from receiving this notice that you dispute the validity of this debt or any portion thereof, this office will obtain verification of the debt or obtain a copy of judgment and mail you a copy of such judgment or verification. If you request this in writing within 30 days after receiving this notice this office will provide you with the name and address of the original creditor, if different from the current creditor.

Sincerely,

Mrs. Sarah Reed
Mrs. Sarah Reed
1-800-482-8026 EXT 101

OR MAIL TO:
ACCOUNT CONTROL SYSTEMS
85 Chestnut Ridge Rd SUITE 113
Montvale, NJ 07645

CURRENT CREDITOR(S):
ORIGINAL CREDITOR(S):

DR. LEONARD'S/CAROL WRIGHT : \$299.94
AMERIMARK : \$305.51

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

PLEASE SEE REVERSE SIDE FOR ALL PAYMENT OPTIONS

Payment Method Options



www.acswebpay.net

1. TO MAKE A PAYMENT ONLINE OR PROPOSE YOUR OWN PAYMENT PLAN 24/7
VISIT OUR VIRTUAL COLLECTOR AT www.acswebpay.net

2. Check One: VISA Discover MasterCard American Express



Expiration Date: ___ / ___ / ___

Amount of Payment: \$ _____

Card #: _____

Signature _____

Security Code:



3. Check by Phone

Call 1-800-482-8026. You will need your checking account # and routing # to complete this transaction.

MoneyGram ExpressPayment Instructions

4. Money Gram "Express Payment"

Payable to : Account Control Systems

Receive Code :

Account Number: _____ Attn: _____

5. Mail Check or Money order to: ACS

85 Chestnut Ridge Rd, Suite 113
Montvale, NJ 07645

Please include your A.C.S.#

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.)

Place an "X" in the appropriate box (required): Green Bay Division Milwaukee Division

I. (a) PLAINTIFFS

SANDRA BAZILE, on behalf of herself and all others similarly situated

DEFENDANTS

ACCOUNT CONTROL SYSTEMS, INC., a New Jersey Corporation

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

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.

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

Stern Thomasson LLP
150 Morris Avenue, 2nd Floor
Springfield, NJ 07081-1315
(973) 379-7500

Attorneys (If Known)

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)

- | | | | | | |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| | PTF | DEF | | PTF | DEF |
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

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

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	PERSONAL INJURY <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	PERSONAL INJURY <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 PERSONAL PROPERTY <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 LABOR <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	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <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
REAL PROPERTY <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	CIVIL RIGHTS <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	PRISONER PETITIONS Habeas Corpus: <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 Other: <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	IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	

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):
15 USC §1692 et seq.

Brief description of cause:
Claims under Fair Debt Collection Practices Act

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$ 500,000.00

CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE _____

DOCKET NUMBER _____

DATE

06/06/2018

SIGNATURE OF ATTORNEY OF RECORD

s/ Andrew T. Thomasson

UNITED STATES DISTRICT COURT
for the
Eastern District of Wisconsin

SANDRA BAZILE, et al.

Plaintiff(s)

v.

ACCOUNT CONTROL SYSTEMS, INC.,
a New Jersey Corporation

Defendant(s)

Civil Action No. 1:18-cv-00864

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) ACCOUNT CONTROL SYSTEMS, INC.
c/o Its Registered Agent, Registered Agent Solutions, Inc.
901 South Whitney Way
Madison, Wisconsin 53711

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you receive it) – or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12(a)(2) or (3) – you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or the plaintiff's attorney, whose name and address are:

Stern Thomasson LLP
150 Morris Avenue, 2nd Floor
Springfield, NJ 07081-1315

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

STEPHEN C. DRIES, CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Account Control Systems Tagged with Debt Collection Class Action in Wisconsin](#)
