

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

GREB LEEB, *individually and on behalf of*)
other similarly situated,)
)
Plaintiff,)
)
v.)
)
CHARTER COMMUNICATIONS, INC.)
D/B/A SPECTRUM.)
)
Defendant.)

Case No: 4:17-cv-02780

JURY TRIAL DEMANDED

COMPLAINT – CLASS ACTION

1. Plaintiff Greg Leeb brings this action against Defendant Charter Communications, Inc. d/b/a Spectrum (“Spectrum”), to secure redress for Defendant’s practice of calling the cellular telephone numbers of Plaintiff and others using an automatic telephone dialing system and prerecorded voice, in violation of the Telephone Consumer Protection Act (“TCPA”), 47 U.S.C. § 227.

INTRODUCTION

2. Advancements in telephone dialing technology by the 1980s and 90s made reaching a large number of consumers by telephone easier and more cost-effective. However, this technology has also brought with it an onslaught of unsolicited robocalls, spam text messages, and junk faxes that intrude on individual privacy and waste consumer time and money. As a result, the federal government and numerous states have enacted legislation to combat these widespread telemarketing abuses. As Congress recognized:

Many customers are outraged over the proliferation of intrusive, nuisance calls to their homes from telemarketers.... Banning such automated or prerecorded telephone calls . . . 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.

Pub. L. No. 102-243, 105 Stat. 2394 § 2(6, 12) (1991).

3. As is relevant here, federal law under the TCPA prohibits “mak[ing] any call (other than a call made for emergency purposes or made with the prior express consent of the called party) using any automatic telephone dialing system or an artificial or prerecorded voice . . . to any telephone number assigned to a . . . cellular telephone service[.]” 47 U.S.C. § 227(b)(1)(A)(iii).

4. The TCPA provides for injunctive relief and the greater of actual damages or \$500 per violation, which can be trebled where the statute was “willfully or knowingly” violated. 47 U.S.C. § 227(b)(3).

5. Defendant Spectrum caused multiple, unsolicited, automated calls to be made to Plaintiff’s cell phone, and Plaintiff files this class action complaint on behalf of himself and others similarly situated, seeking relief from Defendant’s illegal calling practices.

JURISDICTION AND VENUE

6. This Court has federal question subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331 with respect to Plaintiff’s TCPA claims. *Mims v. Arrow Financial Services, Inc.*, 132 S. Ct. 740 (2012).

7. The Court has personal jurisdiction over Defendant and venue is appropriate in this District under 28 U.S.C. § 1391(a) because Spectrum does business in this District, Defendant keeps and maintains places of business in St. Louis County, Missouri, and is believed to have initiated the calls that are the subject of this lawsuit to Plaintiff and others in this District, and because a substantial portion of the events giving rise to this cause of action

occurred in this District.

PARTIES

8. Plaintiff Greg Leeb is a natural person residing in St. Clair County, Illinois.

9. Defendant Charter Communications, Inc. d/b/a Spectrum is an active Delaware corporation with offices located at 12405 Powerscourt Drive, St. Louis, MO 63131. Charter, through its subsidiaries, including Charter Communications Holdings, LLC and Charter Communications Operating, LLC (the “Spectrum Family Companies”) offer cable, internet, and telephone services to consumers throughout the United States.

10. Defendant Spectrum is registered with the Missouri Secretary of State as an active foreign for-profit business whose registered agent is CSC-Lawyers Incorporating Service Company, 221 Bolivar Street, Jefferson City, MO 65101.

FACTS

11. Within the four years prior to the filing of this action, Defendant caused autodialed and prerecorded-voice calls to be made to the cell phones of Plaintiff and other consumers, without the prior express consent of the called party.

12. On information and belief, the equipment used to call Plaintiff and others not only had the capacity to store or produce telephone numbers to be called using a random or sequential number generator (and to dial such numbers), but was programmed to sequentially or randomly access stored telephone numbers to automatically call such numbers. These calls were made with equipment capable of dialing numerous phone numbers in a short period of time without human intervention, as part of an automated process.

13. On information and belief, Defendant used dialing system(s) that are automatic telephone dialing systems under the TCPA.

14. Defendant also used a dialing system(s) that delivered pre-recorded messages or an artificial voice to Plaintiff's cell phone.

15. The people to whom Defendant made or caused to be made autodialed or prerecorded-voice calls never expressly consented to receive such calls, or expressly told Defendant not to call their phones, including Plaintiff.

16. On information and belief, many of these individuals were sent more than one call, and Defendant lacks an adequate system for preventing autodialed or prerecorded-voice calls to phones for which it does not have consent.

17. Defendant made these calls to Plaintiff and the other members of the class defined below intentionally. Defendant has been well aware of the TCPA's prohibitions against use of autodialers and certain use of pre-recorded voice technology in calls to consumers, but made the business decision to make these calls, anyway.

18. Indeed, in 2015, the Missouri Attorney General Chris Koster filed a complaint for civil penalties, permanent injunctions, and other equitable relief against Defendant relating to Defendant's use of autodialing and prerecorded-voice messages for unsolicited calls in the telemarketing context. *See State of Missouri ex rel. Koster v. Charter Communications, Inc.*, 4:15-cv-01593-RLW.

Facts Relating to Plaintiff

19. Plaintiff has received multiple calls to his cellular telephone from Defendant for the purposes of attempting to collect an alleged past-due account from someone named "Sara Price." Most, if not all, of these calls are believed to have happened around October 2017.

20. Defendant did not have permission or consent to make the calls.

21. Plaintiff did not authorize the automated placement of calls to his cell phone.

22. Plaintiff did not furnish his cell phone number to Defendant.

23. Defendant knew it did not have Plaintiff's consent to make some or all of these calls. Plaintiff specifically told Defendant not to make such calls to his cell phone number, including during a call on or about October 8, 2017. Nevertheless, Defendant continued to cause these calls to be made to Plaintiff.

24. When Plaintiff answered some of these calls, a prerecorded message played, which indicated that the calls were from Defendant.

25. During the time at issue, Plaintiff also received at least one automated telephone message upon answering his cell phone. The message was as follows:

Hello this is Spectrum calling about restoring your service. It is important you call (877) 958-7183 upon receiving this message. Thank you.

26. The Defendant's calls to the cell phones of Plaintiff and others were made using an automatic telephone dialing system ("autodialer") under the TCPA. The equipment had the capacity to store or produce telephone numbers to be called using a random or sequential number generator, and to dial such numbers. In other words, no human being physically dialed each digit of Plaintiff's and the other class members' telephone numbers to call their phones—the calls were made using equipment with the capacity to dial a large number of phone numbers in a short period of time, without human intervention. The equipment used to call Plaintiff and the other class members sequentially or randomly accessed their stored telephone numbers, and automatically called them. Further, one of Defendant's supervisors specifically told Plaintiff during a call on or about October 11, 2017—when Plaintiff specifically reiterated that Defendant not make such call to his cell phone number—that the calls were being made through an "autodialer."

27. Further, on or about October 11, 2017 a supervisor for Defendant who identified himself as “Ahmed” specifically told Plaintiff during a call—when Plaintiff again reiterated that Defendant not make such calls to his cell phone number—that the calls were being made through an “autodialer.”

28. Defendant’s business model is to knowingly use an autodialer and/or artificial or prerecorded voices to call cellular telephones it knows it does not have consent to call, and to hide behind an arbitration clause when challenged in court.

29. Upon information and belief, Defendant already keeps records and data from which it can determine which autodialed calls it made without consent, but has elected not to engage such to prevent TCPA violations for business reasons.

30. Plaintiff and the class have been damaged by Defendant’s calls. Their privacy was improperly invaded, Defendant’s calls temporarily seized and trespassed upon the use of their phones, and they were forced to divert attention away from other activities to address the calls. Defendant’s calls were annoying and a nuisance, and wasted the time of Plaintiff and the class. *See, e.g., Mims v. Arrow Fin. Servs., Inc.*, 132 S. Ct. 740 (Jan. 18, 2012) (discussing congressional findings of consumer “outrage” as to autodialed and prerecorded calls).

31. Plaintiff suffered an injury-in-fact in at least one of the manners contemplated by Congress when it passed the TCPA because of Defendant’s conduct.

32. Plaintiff’s injury-in-fact is fairly tracable to the challenged representations and conduct of Defendant.

33. Plaintiff’s injury-in-fact is likely to be redressed by a favorable decision in this Court.

COUNT I

Violations of the TCPA, 47 U.S.C. § 227 (Artificial/Pre-Recorded Voice Calls)

34. Plaintiff re-alleges and incorporates the foregoing allegations as if fully set forth herein.

35. It is a violation of the TCPA to make “any call (other than a call made for emergency purposes or made with the prior express consent of the called party) using . . . an artificial or prerecorded voice . . . to any telephone number assigned to a . . . cellular telephone service” 47 U.S.C. § 227(b)(1)(A)(iii).

36. Defendant initiated or caused to be initiated calls to the cellular telephone numbers of Plaintiff and the other members of the class defined below using an artificial or prerecorded voice.

37. These calls were made without regard to whether or not Defendant had previously obtained express permission from Plaintiff or other members of the class to make such calls. In fact, Defendant did not have prior express consent to call the cell phones of the cell phones of Plaintiff and the other members of the class when the calls were made when the calls were made.

38. Defendant’s calls were willful or knowing.

39. Defendant violated the TCPA by making non-emergency calls to the cell phones of Plaintiff and others using an artificial or prerecorded voice, without prior express consent.

40. Upon information and belief, some of the calls to Plaintiff and the class were made by vendors of Defendant. Defendant is liable for those calls, too.

41. As a result of Defendant’s conduct and pursuant to Section 227(b)(3) of the TCPA, Plaintiff and other members of the class were harmed and are each entitled to a

minimum of \$500 in damages for each violation. Plaintiff and class are also entitled to an injunction against future calls. 47 U.S.C. § 227(b)(3).

42. Because Defendant knew or should have known that Plaintiff and the other members of the class had not given prior express consent to receive its calls using an artificial or prerecorded voice to the cell phones of Plaintiff and others—and/or willfully caused calls to be made to the cell phones of Plaintiff and the other members of the class without prior express consent—the Court should treble the amount of statutory damages available to Plaintiff, pursuant to Section 227(b)(3) of the TCPA.

COUNT II
Violations of the TCPA, 47 U.S.C. § 227 (ATDS Calls)

43. Plaintiff re-alleges and incorporates the foregoing allegations as if fully set forth herein.

44. It is a violation of the TCPA to make “any call (other than a call made for emergency purposes or made with the prior express consent of the called party) using any automatic telephone dialing system . . . to any telephone number assigned to a . . . cellular telephone service” 47 U.S.C. § 227(b)(1)(A)(iii).

45. Defendant initiated or caused to be initiated calls to the cellular telephone numbers of Plaintiff and the other members of the class defined below using an automatic telephone dialing system.

46. These calls were made without regard to whether or not Defendant had previously obtained express permission from the called party to make such calls. In fact, Defendant did not have prior express consent to call the cell phones of Plaintiff and the other members of the class when the calls were made.

47. These calls were willful or knowing.

48. Defendant violated the TCPA by making non-emergency calls to the cell phones of Plaintiff and others using an automatic telephone dialing system without prior express consent.

49. Upon information and belief, some of the calls to Plaintiff and the class were made by vendors of Defendant. Defendant is liable for those calls, too.

50. As a result of Defendant's conduct and pursuant to Section 227(b)(3) of the TCPA, Plaintiff and the other members of the class were harmed and are each entitled to a minimum of \$500 in damages for each violation. Plaintiff and the class are also entitled to an injunction against future calls. 47 U.S.C. § 227(b)(3).

51. Because Defendant knew or should have known that Plaintiff and the other members of the class had not given prior express consent to receive its automated calls to their cell phones—and/or willfully caused automated calls to be made to the cell phones of Plaintiff and the other members of the class without prior express consent—the Court should treble the amount of statutory damages available to Plaintiff and the other members of the class, pursuant to Section 227(b)(3) of the TCPA.

Class Allegations

52. Plaintiff brings this action on behalf of a class consisting of:

(a) All persons in the United States whose cellular telephone number, (b) on or after four years prior to the filing of this action, (c) Defendant or someone on its behalf called using the same or similar dialing system/method used to call Plaintiff, (d) where Defendant's records do not show that the person provided the cellular telephone number to Defendant.

53. Upon information and belief, in the four years prior to the filing of this action, there were more than 40 persons whose cell phone number Defendant or a third-party on its behalf called without permission using the same equipment used to call Plaintiff.

54. Common questions of law or fact exist as to all members of the class, which predominate over any questions solely affecting any individual member, including Plaintiff.

Such questions common to the class include but are not limited to:

- a. Whether the calls to Plaintiff and the class were made using an “automatic telephone dialing system” as such term is defined or understood under the TCPA and applicable FCC regulations and orders;
- b. Whether the calls to Plaintiff and the class were made using a prerecorded message as such term is defined or understood under the TCPA and applicable FCC regulations and orders
- c. Whether Defendant had prior express consent to call the cell phone numbers of Plaintiff and the other members of the class; and
- d. Damages, including whether any violations were performed willfully or knowingly such that Plaintiff and the other members of the class are entitled to treble damages under 47 U.S.C. § 227(b)(3).

55. Plaintiff’s claims are typical of the claims of the other members of the class. The factual and legal bases of Defendant’s liability to Plaintiff and the other members of the class are the same: Defendant violated the TCPA by causing automated calls to be made to the cellular telephone number of each member of the class, without permission.

56. Plaintiff will fairly and adequately protect the interests of the class. Plaintiff has no interests that might conflict with the interests of the class. Plaintiff is interested in pursuing his claims vigorously, and he has retained counsel competent and experienced in class and complex litigation, including with regards to the claims alleged herein.

57. Class action treatment is superior to the alternatives for the fair and efficient

adjudication of the controversy alleged herein. Such treatment will permit a large number of similarly situated persons to prosecute their common claims in a single forum simultaneously, efficiently, and without the duplication of effort and expense that numerous individual action would entail. There are, on information and belief, thousands of class members, such that joinder of all members is impracticable.

58. No difficulties are likely to be encountered in the management of this action that would preclude its maintenance as a class action, and no superior alternative exists for the fair and efficient adjudication of this controversy.

59. Defendant has acted and failed to act on grounds generally applicable to Plaintiff and the other members of the class, thereby making relief appropriate with respect to the class as a whole. Prosecution of separate actions by individual members of the class, should they even realize that their rights have been violated, would likely create the risk of inconsistent or varying adjudications with respect to individual members of the class that would establish incompatible standards of conduct.

60. The identity of the class is, on information and belief, readily identifiable from Defendant's records.

WHEREFORE, Plaintiff Greg Leeb, individually and on behalf of the class, respectfully requests that the Court enter judgment against Defendant for:

- A. Certification of the class as alleged herein;
- B. A declaration that Defendant violated the TCPA as to Plaintiff and the class;
- C. Injunctive relief aimed at ensuring the prevention of Defendant from violating the TCPA in the future;
- D. Costs of suit;

- E. Attorneys' fees, as permitted by law; and
- F. Such other or further relief as the Court deems just and proper.

JURY DEMAND

Plaintiff requests a trial by jury of all claims that can be so tried.

DATED: November 28, 2017

Respectfully Submitted,

STURYCZ LAW GROUP LLC

By: /s/ Nathan D. Sturycz
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Edwardsville, IL 62025
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Fax: 314-667-2733
nathan@sturyczlaw.com
Attorney for Plaintiff

NOTICE OF LIEN & ASSIGNMENT

Please be advised the we claim a lien upon any recovery herein for 1/3 of such amount as a court awards. All rights relating to attorneys' fees have been assigned to counsel.

/s/ Nathan D. Sturycz

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
GREG LEEB

DEFENDANTS
CHARTER COMMUNICATIONS D/B/A SPECTRUM

(b) County of Residence of First Listed Plaintiff (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)
Nathan D. Sturycz
100 N. Main, Suite 7
Edwardsville, IL 62025 877-314-3223

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)

Large table 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:
TCPA

VII. REQUESTED IN COMPLAINT:

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

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE DOCKET NUMBER 4:17-cv-02780

DATE 11/28/2017 SIGNATURE OF ATTORNEY OF RECORD /s/Nathan D. Sturycz

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.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 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.

Civil Action No. 4:17-cv-02780

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____ .

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____ , who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____ ; or

I returned the summons unexecuted because _____ ; or

Other *(specify):* _____ .

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____ .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Charter Communications Hit with Class Action Over Alleged Robocalls](#)
