UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

KAREN MAISONET on behalf of herself and all other similarly situated consumers

Plaintiff,

-against-

UNITED COLLECTION BUREAU, INC.

Defendant.

CLASS ACTION COMPLAINT

Introduction

 Plaintiff, Karen Maisonet, brings this action against United Collection Bureau, Inc. for violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, et *seq*. ("FDCPA"). The FDCPA prohibits debt collectors from engaging in abusive, deceptive and unfair collection practices while attempting to collect on debts.

Parties

- 2. Plaintiff is a citizen of the State of New York who resides within this District.
- 3. Plaintiff is a consumer as that term is defined by Section 1692(a)(3) of the FDCPA, in that the alleged debt that Defendant sought to collect from Plaintiff a consumer debt.
- Upon information and belief, Defendant's principal place of business is located in Toledo, Ohio.
- 5. Defendant is regularly engaged, for profit, in the collection of debts allegedly owed by consumers.

6. Defendant is a "debt collector" as that term is defined by the FDCPA, 15 U.S.C. § 1692(a)(6).

Jurisdiction and Venue

- This Court has federal question jurisdiction under 15 U.S.C. § 1692k(d) and 28 U.S.C. § 1331.
- 8. Venue is proper in this district pursuant to 28 U.S.C. § 1391(b), as the acts and transactions that give rise to this action occurred, in substantial part, in this district.

Allegations Particular to Karen Maisonet

- 9. Upon information and belief, on a date better known by Defendant, Defendant began to attempt to collect an alleged consumer debt from the Plaintiff.
- 10. On or about September 6, 2016, Defendant sent the Plaintiff a collection letter.
- 11. The said letter was an effort to collect on a consumer debt.
- 12. The said letter identified the amount owing as the "Current Account Balance," words that imply that the balance may increase at a later stage. See <u>Chuway v. National Action</u> <u>Financial Services, 362 F.3d 944 (7th Cir.2004)</u> (Letter stating the balance but inviting the debtor to call to obtain "the most current balance information" creates doubt as to whether the balance stated is increasing and violates the FDCPA unless an explanation is provided.)
- 13. The Plaintiff was left uncertain as to whether the "Current Account Balance" would increase there was no disclosure that indicated otherwise.
- The letter does not clearly state either that the amount will or will not increase. See <u>Avila v. Riexinger & Associates, LLC, 817 F.3d 72, (2d Cir. 1016)</u>.
- 15. The said letter provided a column with an itemized accounting of the debt as required by

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New York state statute which informed the consumer that no interest or fees have been added post charge-off.

- 16. However, the period of time that has elapsed since charge-off is not stated in the collection letter, confusing the least sophisticated consumer as to whether interest or fees will be added in the future.
- 17. While it is typical for collection letters to state an "amount due" or a "current balance", it is not typical for a letter to state that the amount owed is as of a specific date as such language would imply the potential of a different balance on a different date.
- 18. The FDCPA requires debt collectors, when notifying consumers of their account balance, to disclose that the balance may increase due to interest and fees; failure to include such disclosures would harm consumers such as the Plaintiff who may hold the reasonable but mistaken belief, that timely payment will satisfy their debts and it would abrogate the Congressional purpose of full and fair disclosure to consumers that is embodied in Section 1692e.
- 19. Collection notices that state only the "Current Account Balance," but do not disclose that the balance might increase due to interest and fees, are "misleading" within the meaning of Section 1692e.
- 20. The Defendant violated 15 U.S.C. § 1692e(2)(A) for misrepresenting the amount of the debt owed by the Plaintiff.
- 21. 15 U.S.C. § 1692e of the FDCPA provides:

A debt collector may not use any false, deceptive, or misleading representation or means in connection with the collection of any debt. Without limiting the general application of the foregoing, the following conduct is a violation of this section:

(2) The false representation of --

(A) the character, amount, or legal status of any debt; or

(10) the use of any false representation or deceptive means to collect or attempt to collect any debt or to obtain information concerning a consumer.

22. 15 U.S.C. § 1692g of the FDCPA provides:

(a) Within five days after the initial communication with a consumer in connection with the collection of any debt, a debt collector shall, unless the following information is contained in the initial communication or the consumer has paid the debt, send the consumer a written notice containing-

(1) the amount of the debt.

- 23. The Defendant failed to provide the consumer with the actual amount of the debt in its initial communication with the Plaintiff.¹
- 24. Upon information and belief, such actions are part of a scheme or business of the Defendant when attempting to collect alleged debts from consumers in the State of New York.
- 25. Upon information and belief, the Defendant's collection letters, such as the said September 6, 2016 collection letter, number in at least the hundreds.
- 26. Defendant's March September 6, 2016 letter is in violation of 15 U.S.C. §§ 1692e, 1692e(2), 1692e(10), 1692g and 1692g(a)(1) for failing to clearly state the amount of the debt which is due and owing, by implying that a payment sooner rather than later will be more economical for the consumer and by employing false, deceptive and misleading representations in connection with the collection of a debt.
- 27. Plaintiff suffered injury in fact by being subjected to unfair and abusive practices of the

¹ Beauchamp v. Fin. Recovery Services, Inc., 2011 U.S. Dist. LEXIS 25512, 2011 WL 891320, at *2 (S.D.N.Y. Mar. 14, 2011) (Ultimately, the critical question [in determining whether a communication violates the F.D.C.P.A.] is . . . whether the notice fails to convey the required information clearly and effectively and thereby makes the least sophisticated consumer uncertain as to the [6] meaning of the message. . . . letter may, in violation of 15 U.S.C. § 1692g, make the least sophisticated consumer uncertain as to her rights and confused about the total amount she owes where the "[1]etter provides that the outstanding balance may increase".)

Defendant.

- 28. Plaintiff suffered actual harm by being the target of the Defendant's misleading debt collection communications.
- 29. Defendant violated the Plaintiff's right not to be the target of misleading debt collection communications.
- 30. Defendant violated the Plaintiff's right to a truthful and fair debt collection process.
- 31. Defendant used materially false, deceptive, misleading representations and means in its attempted collection of Plaintiff's alleged debt.
- 32. Defendant's communications were designed to cause the debtor to suffer a harmful disadvantage in charting a course of action in response to Defendant's collection efforts.
- 33. The FDCPA ensures that consumers are fully and truthfully apprised of the facts and of their rights, the act enables them to understand, make informed decisions about, and participate fully and meaningfully in the debt collection process. The purpose of the FDCPA is to provide information that helps consumers to choose intelligently. The Defendant's false representations misled the Plaintiff in a manner that deprived her of her right to enjoy these benefits, these materially misleading statements trigger liability under section 1692e of the Act.
- 34. These deceptive communications additionally violated the FDCPA since they frustrate the consumer's ability to intelligently choose his or her response.
- 35. Plaintiff seeks to end these violations of the FDCPA. Plaintiff has suffered damages including but not limited to, fear, stress, mental anguish, emotional stress and acute embarrassment. Plaintiff and putative class members are entitled to preliminary and permanent injunctive relief, including, declaratory relief, and damages.

CLASS ALLEGATIONS

- 36. 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.
- 37. The identities of all class members are readily ascertainable from the records of United Collection Bureau, Inc. and those business and governmental entities on whose behalf it attempts to collect debts.
- 38. Excluded from the Plaintiff's Class is the Defendant and all officers, members, partners, managers, directors, and employees of United Collection Bureau, Inc., and all of their respective immediate families, and legal counsel for all parties to this action and all members of their immediate families.
- 39. There are questions of law and fact common to the Plaintiff's Class, which common issues predominate over any issues involving only individual class members. The principal issues are whether the Defendant's communications with the Plaintiff, such as the above stated claims, violate provisions of the Fair Debt Collection Practices Act.
- 40. The Plaintiff's claims are typical of the class members, as all are based upon the same facts and legal theories.
- 41. The Plaintiff will fairly and adequately protect the interests of the Plaintiff's Class defined in this complaint. The Plaintiff has retained counsel with experience in handling consumer lawsuits, complex legal issues, and class actions, and neither the Plaintiff nor her attorneys have any interests, which might cause them not to vigorously pursue this action.

- 42. 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) <u>Numerosity</u>: The Plaintiff is informed and believes, and on that basis alleges, that the Plaintiff's Class defined above is so numerous that joinder of all members would be impractical.
 - (b) <u>Common Questions Predominate:</u> Common questions of law and fact exist as to all members of the Plaintiff's Class and those questions predominate over any questions or issues involving only individual class members. The principal issues are whether the Defendant's communications with the Plaintiff, such as the above stated claims, violate provisions of the Fair Debt Collection Practices Act.
 - (c) <u>Typicality:</u> The Plaintiff's claims are typical of the claims of the class members. Plaintiff and all members of the Plaintiff's Class defined in this complaint have claims arising out of the Defendant's common uniform course of conduct complained of herein.
 - (d) Adequacy: The Plaintiff will fairly and adequately protect the interests of the class members insofar as Plaintiff has no interests that are adverse to the absent class members. The 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 the Plaintiff nor her counsel have any interests, which might cause them not to vigorously pursue the instant class action lawsuit.

- (e) Superiority: A class action is superior to the other available means for the fair and efficient adjudication of this controversy because individual joinder of all members would be impracticable. Class action treatment will permit a large number of similarly situated persons to prosecute their common claims in a single forum efficiently and without unnecessary duplication of effort and expense that individual actions would engender. Certification of a class under Rule 23(b)(l)(A) of the Federal Rules of Civil Procedure is appropriate because adjudications with respect to individual members create a risk of inconsistent or varying adjudications which could establish incompatible standards of conduct for Defendant who, on information and belief, collects debts throughout the United States of America.
- 43. Certification of a class under Rule 23(b)(2) of the Federal Rules of Civil Procedure is also appropriate in that a determination that the above stated claims, violate provisions of the Fair Debt Collection Practices Act, and is tantamount to declaratory relief and any monetary relief under the FDCPA would be merely incidental to that determination.
- 44. Certification of a class under Rule 23(b)(3) of the Federal Rules of Civil Procedure is also appropriate in that the questions of law and fact common to members of the Plaintiff's 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.

- 45. Further, Defendant has acted, or failed to act, on grounds generally applicable to the Rule (b)(l)(A) and (b)(2) Class, thereby making appropriate final injunctive relief with respect to the Class as a whole.
- 46. Depending on the outcome of further investigation and discovery, Plaintiff may, at the time of class certification motion, seek to certify one or more classes only as to particular issues pursuant to Fed. R. Civ. P. 23(c)(4).

CAUSE OF ACTION

Violations of the Fair Debt Collection Practices Act brought by Plaintiff on behalf of herself and the members of a class, as against the Defendant.

- 47. Plaintiff repeats, reiterates, and incorporates the allegations contained in paragraphs numbered one (1) through forty six (46) herein with the same force and effect is if the same were set forth at length herein.
- 48. This cause of action is brought on behalf of Plaintiff and the members of a class.
- 49. The class involves all individuals whom Defendant's records reflect resided in the State of New York and who were sent a collection letter in substantially the same form letter as the letter sent to the Plaintiff on or about September 6, 2016; and (a) the collection letter was sent to a consumer seeking payment of a personal debt; and (b) the collection letter was not returned by the postal service as undelivered; and (c) the Plaintiff asserts that the letter contained violations of 15 U.S.C. §§ 1692e, 1692e(2), 1692e(10), 1692g and 1692g(a)(1) for failing to clearly state the amount of the debt which is due and owing, by implying that a payment sooner rather than later will be more economical for the consumer and by employing false, deceptive and misleading representations in connection with the collection of a debt.

Violations of the Fair Debt Collection Practices Act

- 50. The Defendant's actions as set forth above in the within complaint violates the Fair Debt Collection Practices Act.
- 51. Because the Defendant violated the Fair Debt Collection Practices Act, the Plaintiff and the members of the class are entitled to damages in accordance with the Fair Debt Collection Practices Act.

WHEREFORE, Plaintiff, respectfully requests preliminary and permanent injunctive relief, and that this Court enter judgment in Plaintiff's favor and against the Defendant and award damages as follows:

- (a) Statutory damages provided under the FDCPA, 15 U.S.C. § 1692(k);
- (b) Attorney fees, litigation expenses and costs incurred in bringing this action; and
- (c) Any other relief that this Court deems appropriate and just under the circumstances.

Dated: Brooklyn, New York September 4, 2017

> /s/ Maxim Maximov Maxim Maximov, Esq. Attorneys for the Plaintiff Maxim Maximov, LLP 1701 Avenue P Brooklyn, New York 11229 Office: (718) 395-3459 Facsimile: (718) 408-9570 E-mail: m@maximovlaw.com

Plaintiff requests trial by jury on all issues so triable.

/s/ Maxim Maximov Maxim Maximov, Esq.

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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			DEFENDANTS		
KAREN MAISONET			UNITED COLLECTION BUREAU, INC.		
(b) County of Residence of First Listed Plaintiff KINGS			County of Residence of First Listed Defendant		
(E2	XCEPT IN U.S. PLAINTIFF CA	ASES)	<i>(IN U.S. PLAINTIFF CASES ONLY)</i> NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF		
			THE TRAC	T OF LAND INVOLVED.	
(c) Attorneys (Firm Name, A MAXIM MAXIMOV, LLP 1701 AVENUE P BROOKLYN, NEW YORI	OFFICE: FAX: (71	^{r)} (718) 395-3459 8) 408-9570 M@MAXIMOVLAW	Attorneys (If Known)	
II. BASIS OF JURISDI	CTION (Place an "X" in C	ne Box Only)			(Place an "X" in One Box for Plaintiff
□ 1 U.S. Government Plaintiff	■ 3 Federal Question (U.S. Government)	Not a Party)		TF DEF □ 1 □ 1 Incorporated <i>or</i> Pr of Business In T	
2 U.S. Government Defendant	☐ 4 Diversity (Indicate Citizensh	ip of Parties in Item III)	Citizen of Another State	2 2 Incorporated and H of Business In A	
			Citizen or Subject of a Foreign Country	3 3 Foreign Nation	
IV. NATURE OF SUIT					
CONTRACT □ 110 Insurance	PERSONAL INJURY	DRTS PERSONAL INJURY	FORFEITURE/PENALTY Y □ 625 Drug Related Seizure	BANKRUPTCY □ 422 Appeal 28 USC 158	OTHER STATUTES ☐ 375 False Claims Act
 110 Insurance 120 Marine 130 Miller Act 140 Negotiable Instrument 150 Recovery of Overpayment & Enforcement of Judgment 	 310 Airplane 315 Airplane Product Liability 320 Assault, Libel & 	 365 Personal Injury - Product Liability 367 Health Care/ Pharmaceutical Personal Injury 	of Property 21 USC 881	 423 Withdrawal 28 USC 157 PROPERTY RIGHTS 820 Copyrights 	 400 State Reapportionment 410 Antitrust 430 Banks and Banking 450 Commerce 460 Deportation
 151 Medicare Act 152 Recovery of Defaulted Student Loans 	 330 Federal Employers' Liability 340 Marine 	Product Liability 368 Asbestos Personal Injury Product		 830 Patent 840 Trademark 	 470 Racketeer Influenced and Corrupt Organizations 480 Consumer Credit
 (Excludes Veterans) □ 153 Recovery of Overpayment of Veteran's Benefits 	 345 Marine Product Liability 350 Motor Vehicle 	Liability PERSONAL PROPER 370 Other Fraud	LABOR RTY I 710 Fair Labor Standards Act	SOCIAL SECURITY □ 861 HIA (1395ff) □ 862 Black Lung (923)	 490 Cable/Sat TV 850 Securities/Commodities/ Exchange
 160 Stockholders' Suits 190 Other Contract 	□ 355 Motor Vehicle Product Liability	 370 Other Pradu 371 Truth in Lending 380 Other Personal 	720 Labor/Management Relations	□ 864 SSID Title XVI	 890 Other Statutory Actions 891 Agricultural Acts
 195 Contract Product Liability 196 Franchise 	□ 360 Other Personal Injury	Property Damage 385 Property Damage	740 Railway Labor Act	□ 865 RSI (405(g))	 893 Environmental Matters 895 Freedom of Information
	362 Personal Injury - Medical Malpractice	Product Liability	Leave Act 790 Other Labor Litigation		Act 896 Arbitration
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITION		FEDERAL TAX SUITS	□ 899 Administrative Procedure
 210 Land Condemnation 220 Foreclosure 230 Rent Lease & Ejectment 240 Torts to Land 	 440 Other Civil Rights 441 Voting 442 Employment 443 Housing/ 	Habeas Corpus: 463 Alien Detainee 510 Motions to Vacate Sentence	Income Security Act	 \$70 Taxes (U.S. Plaintiff or Defendant) \$71 IRS—Third Party 26 USC 7609 	Act/Review or Appeal of Agency Decision 950 Constitutionality of State Statutes
 245 Tort Product Liability 290 All Other Real Property 	Accommodations 445 Amer. w/Disabilities -	 530 General 535 Death Penalty 	IMMIGRATION		
	Employment 446 Amer. w/Disabilities - Other 448 Education	Other: 540 Mandamus & Othe 550 Civil Rights 555 Prison Condition 560 Civil Detainee - Conditions of Confinement	 462 Naturalization Application 465 Other Immigration Actions 	n	
V. ORIGIN (Place an "X" in	n One Box Only)	-			<u> </u>
		Remanded from Appellate Court	□ 4 Reinstated or Reopened □ 5 Trans Anoth (specifi	er District Litigation	
VI. CAUSE OF ACTIO	15 U.S.C. SECT	ION 1692 FÁIR D	re filing (Do not cite jurisdictional sta DEBT COLLECTION PRAC	atutes unless diversity): TICES ACT (FDCPA)	
	UNLAWFUL ANI	D DECEITFUL DEB	BT COLLECTION BUSINES		
VII. REQUESTED IN COMPLAINT:	CHECK IF THIS UNDER RULE 2	IS A CLASS ACTION 3, F.R.Cv.P.	N DEMAND \$	CHECK YES only JURY DEMAND:	if demanded in complaint: : ★ Yes □ No
VIII. RELATED CASH IF ANY	E(S) (See instructions):	JUDGE		DOCKET NUMBER	
DATE 09/04/2017		SIGNATURE OF ATT	TORNEY OF RECORD XIMOV, ESQ.		
FOR OFFICE USE ONLY					
RECEIPT # AM	//OUNT	APPLYING IFP	JUDGE	MAG. JUI	DGE

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Local Arbitration Rule 83.10 provides that with certain exceptions, actions seeking money damages only in an amount not in excess of \$150,000, exclusive of interest and costs, are eligible for compulsory arbitration. The amount of damages is presumed to be below the threshold amount unless a certification to the contrary is filed.

I, $\underline{N/A}$, counsel for _____, do hereby certify that the above captioned civil action is ineligible for compulsory arbitration for the following reason(s):

monetary damages sought are in excess of \$150,000, exclusive of interest and costs,

the complaint seeks injunctive relief,

the matter is otherwise ineligible for the following reason

DISCLOSURE STATEMENT - FEDERAL RULES CIVIL PROCEDURE 7.1

Identify any parent corporation and any publicly held corporation that owns 10% or more or its stocks:

N/A

RELATED CASE STATEMENT (Section VIII on the Front of this Form)

Please list all cases that are arguably related pursuant to Division of Business Rule 50.3.1 in Section VIII on the front of this form. Rule 50.3.1 (a) provides that "A civil case is "related" to another civil case for purposes of this guideline when, because of the similarity of facts and legal issues or because the cases arise from the same transactions or events, a substantial saving of judicial resources is likely to result from assigning both cases to the same judge and magistrate judge." Rule 50.3.1 (b) provides that "A civil case shall not be deemed "related" to another civil case merely because the civil case: (A) involves identical legal issues, or (B) involves the same parties." Rule 50.3.1 (c) further provides that "Presumptively, and subject to the power of a judge to determine otherwise pursuant to paragraph (d), civil cases shall not be deemed to be "related" unless both cases are still pending before the court."

NY-E DIVISION OF BUSINESS RULE 50.1(d)(2)

Is the civil action being filed in the Eastern District removed from a New York State Court located in Nassau or Suffolk 1.) County: NO

2.)	If you answered "no" above:
	a) Did the events or omissions giving rise to the claim or claims, or a substantial part thereof, occur in Nassau or Suffolk
	County? NO

b) Did the events of omissions giving rise to the claim or claims, or a substantial part thereof, occur in the Eastern District? YES

If your answer to question 2 (b) is "No," does the defendant (or a majority of the defendants, if there is more than one) reside in Nassau or Suffolk County, or, in an interpleader action, does the claimant (or a majority of the claimants, if there is more than one) reside in Nassau or Suffolk County?

(Note: A corporation shall be considered a resident of the County in which it has the most significant contacts).

BAR ADMISSION

I am currently admitted in the Eastern District of New York and currently a member in good standing of the bar of this court. X Yes No

Are you currently the subject of any disciplinary action (s) in this or any other state or federal court? (If yes, please explain)

Yes

 \square No

I certify the accuracy of all information provided above.

Signature: /S/ MAXIM MAXIMOV, ESQ.

UNITED COLLECTION BUREAU, INC. 5620 SOUTHWYCK BLVD SUITE 206 TOLEDO OH 43614 www.ucbinc.com

KAREN MAISONET 8 JASON CT HIGHLAND MLS NY 10930-2336

Creditor: Last Four Digits of Creditor Account Number: United Collection Bureau, Inc. Reference Number: Current Account Balance: Chase Bank USA, N.A. 8256

September 6, 2016 Toll Free: 800-354-4108

Dear KAREN MAISONET:

The above referenced debt has been placed with this company for collection. Please remit payment in full to the address below. Or, to make an easy one-time payment online, please go to: <u>www.ucbinc.com</u>, click on 'Make a Payment,' and follow the prompts.

\$3022.62

The information below is an itemized accounting of the debt as required	d by state statute:	
Total amount due as of charge-off	\$3057.62	
Total amount of interest accrued since charge-off:	\$0.00	
Total amount of non-interest charges or fees accrued since charge-off:	\$-35.00	
Total amount of payments made since charge-off:	\$0.00	

When calling our office at 800-354-4108, please refer to reference number

This is an attempt to collect a debt by United Collection Bureau, Inc., a debt collector, and any information obtained will be used for that purpose.

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 a judgment and mail you a copy of such judgment or verification. If you request this office 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.

In accordance with the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 et seq., debt collectors are prohibited from engaging in abasive, deceptive, and unfair debt collection efforts, including but not limited to: (1) the use or threat of violence; (ii) the use of obscene or profane language; and (iii) repeated phone calls made with the intent to annoy, abuse, or barass.

If a creditor or debt collector receives a money judgment against you in court, state and federal laws may prevent the following types of income from being taken to pay the debt 1. Supplemental security income, (SSI); 2. Social security; 3. Public assistance (welfare); 4. Spousal support, maintenance (alimony) or child support; 5. Unemployment benefits; 6. Disability benefits; 7. Workers' compensation benefits; 8. Public or private pensions; 9. Veterans' benefits; 10. Federal student loans, federal student grants, and federal work study funds; and 11. Ninety percent of your wages or salary earned in the last sixty days. days.

SEE REVERSE SIDE FOR IMPORTANT INFORMATION

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PO BOX 1418 MAUMEE OH 43537 ADDRESS SERVICE REQUESTED

September 6, 2016

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Creditor: Last Four Digits of Creditor Account Number:	Chase Bank USA, N.A. 2256
United Collection Bureau, Inc. Reference No: Current Account Belance: United Collection Bureau, Inc. Telephone No:	\$3022.62 800-354-4108
DENIT TO:	

FEELEE FEECHE THIS HOFIDE WITH PAYMENT, COMOT ATTACK THECK TO STUD.

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UNITED COLLECTION BUREAU, INC. PO BOX 1418 MAUMEE OH 43537

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UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

KAREN MAISONET on behalf of herself and all other similarly situated consumers

Plaintiff,

-against-

UNITED COLLECTION BUREAU, INC.

Defendant.

SUMMONS IN A CIVIL ACTION

TO: UNITED COLLECTION BUREAU, INC. 5620 SOUTHWYCK BOULEVARD TOLEDO, OHIO 43614

YOU ARE HEREBY SUMMONED and required to file with the Clerk of this Court and serve upon PLAINTIFF'S ATTORNEY:

MAXIM MAXIMOV, ESQ. MAXIM MAXIMOV, LLP 1701 AVENUE P BROOKLYN, NEW YORK 11229

an answer to the complaint which is herewith served upon you, with **21** days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

CLERK

DATE

BY DEPUTY CLERK

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: Lawsuit: United Collection Bureau Sent Letter Without Proper Disclosures