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13 *Attorneys for Plaintiff,*  
14 *Florence Morris*

15  
16  
17 **UNITED STATES DISTRICT COURT**  
18 **SOUTHERN DISTRICT OF CALIFORNIA**

<p>20 Florence Morris individually and on 21 behalf of others similarly situated</p> <p>22 <b>Plaintiffs,</b></p> <p>23 v.</p> <p>24 Hunter Warfield, Inc.</p> <p>25 <b>Defendant.</b></p>	<p>20 <b>Case No:</b> _____</p> <p>21 <b>Class Action Complaint For</b></p> <p>22 <b>Damages</b></p> <p>23 <b>Jury Trial Demanded</b></p>
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**INTRODUCTION**

1. The United States Congress has found abundant evidence of the use of abusive, deceptive, and unfair debt collection practices by many debt collectors, and has determined that abusive debt collection practices contribute to the number of personal bankruptcies, to marital instability, to the loss of jobs, and to invasions of individual privacy. Congress wrote the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 et seq. (hereinafter “FDCPA”), to eliminate abusive debt collection practices by debt collectors, to insure that those debt collectors who refrain from using abusive debt collection practices are not competitively disadvantaged, and to promote consistent State action to protect consumers against debt collection abuses.
2. The California legislature has determined that the banking and credit system and grantors of credit to consumers are dependent upon the collection of just and owing debts and that unfair or deceptive collection practices undermine the public confidence that is essential to the continued functioning of the banking and credit system and sound extensions of credit to consumers. The Legislature has further determined that there is a need to ensure that debt collectors exercise this responsibility with fairness, honesty and due regard for the debtor’s rights and that debt collectors must be prohibited from engaging in unfair or deceptive acts or practices.
3. Florence Morris, (Plaintiff), through Plaintiff’s attorneys, brings this action to challenge the actions of Hunter Warfield, Inc., (“Defendant”), with regard to attempts by Defendant to unlawfully and abusively collect a debt allegedly owed by Plaintiff, and this conduct caused Plaintiff damages.
4. Plaintiff makes these allegations on information and belief, with the exception of those allegations that pertain to a plaintiff, which Plaintiff alleges on personal knowledge.





1 5. While many violations are described below with specificity, this Complaint  
2 alleges violations of the statutes cited in their entirety.

3 6. Unless otherwise stated, all the conduct engaged in by Defendant took place  
4 in California.

5 7. While many violations are described here with specificity, this Complaint  
6 alleges violations of the FDCPA and Rosenthal Fair Debt Collection Practices  
7 Act, California Civil Code §§ 1788-1788.32 ("Rosenthal Act") in their  
8 entirety.

9 8. Any violations by Defendant were knowing, willful, and intentional, and  
10 Defendant did not maintain procedures reasonably adapted to avoid any such  
11 specific violation.

12 9. All violations alleged regarding the FDCPA are material violations of the  
13 FDCPA as these violations would limit the ability of a hypothetical least  
14 sophisticated debtor to make an intelligent choice as to the alleged debt and  
15 actions that should be taken to resolve the alleged debt.

16 10. Florence Morris, (Plaintiff), through Plaintiff's attorneys, brings this action to  
17 challenge the actions of Hunter Warfield, Inc., ("Defendant"), with regard to  
18 attempts by Defendant to unlawfully and abusively collect a debt allegedly  
19 owed by Plaintiff, and this conduct caused Plaintiff damages.

20 11. Plaintiff makes these allegations on information and belief, with the exception  
21 of those allegations that pertain to a plaintiff, which Plaintiff alleges on  
22 personal knowledge.

23 12. While many violations are described below with specificity, this Complaint  
24 alleges violations of the statutes cited in their entirety.

25 13. Unless otherwise stated, all the conduct engaged in by Defendant took place  
26 in California.

27  
28

1 14. Any violations by Defendant were knowing, willful, and intentional, and  
2 Defendant did not maintain procedures reasonably adapted to avoid any such  
3 specific violation.

4 15. All violations alleged regarding the FDCPA are material violations of the  
5 FDCPA as these violations would limit the ability of a hypothetical least  
6 sophisticated debtor to make an intelligent choice as to the alleged debt and  
7 actions that should be taken to resolve the alleged debt.

8 16. Through this complaint, Plaintiff does not allege that any state court judgment  
9 was entered against Plaintiff in error, and Plaintiff does not seek to reverse or  
10 modify any judgment of any state court.

11 **JURISDICTION AND VENUE**

12 17. Jurisdiction of this Court arises pursuant to 28 U.S.C. § 1332, 15 U.S.C. §  
13 1692(k), and 28 U.S.C. § 1367 for supplemental state claims.

14 18. This action arises out of Defendant's violations of the Fair Debt Collection  
15 Practices Act, 15 U.S.C. §§ 1692 et seq. ("FDCPA") and California's  
16 Rosenthal Act..

17 19. Because Defendant does business within the State of California, personal  
18 jurisdiction is established.

19 20. Venue is proper pursuant to 28 U.S.C. § 1391.

20 21. At all times relevant, Defendant conducted business within the State of  
21 California.

22 **PARTIES**

23 22. Plaintiff is a natural person who resides in the City of San Diego, State of  
24 California.

25 23. Defendant is located in the City of Tampa in the State of Florida.

26 24. Plaintiff is a natural person allegedly obligated to pay a debt, and is a  
27 consumer, as that term is defined by 15 U.S.C. § 1692a(3).  
28

1 25. Plaintiff is a natural person from whom a debt collector sought to collect a  
2 consumer debt which was alleged to be due and owing, and is a debtor as that  
3 term is defined by California Civil Code § 1788.2(h).

4 26. Defendant is a person who uses an instrumentality of interstate commerce or  
5 the mails in a business the principal purpose of which is the collection of  
6 debts, or who regularly collects or attempts to collect, directly or indirectly,  
7 debts owed or due or asserted to be owed or due another and is therefore a  
8 debt collector as that phrase is defined by 15 U.S.C. § 1692a(6).

9 27. Defendant in the ordinary course of business, regularly, on behalf of  
10 themselves, or others, engages in debt collection as that term is defined by  
11 California Civil Code § 1788.2(b), and are therefore a debt collectors as that  
12 term is defined by California Civil Code § 1788.2(c).

13 28. This case involves money, property or their equivalent, due or owing or  
14 alleged to be due or owing from a natural person by reason of a consumer  
15 credit transaction. As such, this action arises out of a consumer debt and  
16 “consumer credit” as those terms are defined by Cal. Civ. Code § 1788.2(f).

17 **FACTUAL ALLEGATIONS**

18 29. Sometime before February 12, 2016, Plaintiff is alleged to have incurred  
19 certain financial obligations.

20 30. These financial obligations were primarily for personal, family or household  
21 purposes and are therefore a “debt” as that term is defined by 15 U.S.C.  
22 §1692a(5).

23 31. Sometime thereafter, but before February 12, 2016, Plaintiff allegedly fell  
24 behind in the payments allegedly owed on the alleged debt. As it is irrelevant  
25 to this action, Plaintiff currently takes no position as to the validity of this  
26 alleged debt.

27 32. Subsequently, but before February 12, 2016, the alleged debt was assigned,  
28 placed, or otherwise transferred, to Defendant for collection.



- 1 33. As a result, on or about February 12, 2016, Defendant sent Plaintiff a written  
2 communication with regard to Plaintiff's alleged debt. A few days later,  
3 Plaintiff received that letter.
- 4 34. Defendant's February 12th letter stated that, "This debt has been reported or is  
5 scheduled to be reported to one or all of the following three national credit  
6 reporting bureaus: Equifax Credit Information Services, LLC, TransUnion  
7 LLC, and Experian Information Solutions Inc. If your debt is reported to the  
8 credit bureaus this could adversely affect your credit."
- 9 35. Additionally, the February 12th letter states "You are hereby notified that a  
10 negative credit report reflecting on your credit record may be submitted to a  
11 credit reporting agency if you fail to fulfill the terms of your credit  
12 obligations."
- 13 36. At this time, on information and belief, Defendant has not submitted a  
14 negative credit report to be rejected on Plaintiff's credit record to the credit  
15 reporting agencies.
- 16 37. Finally, the February 12th letter states "Should you elect to make a payment  
17 by MoneyGram, Western Union, or a credit card, a separate fee will be  
18 charged to you by the payment service provider or processor."
- 19 38. Through this conduct, Defendant violated 15 U.S.C. 1692e(5) by using a  
20 threat to take any action that cannot legally be taken or that is not intended to  
21 be taken.
- 22 39. Through this conduct, Defendant violated 15 U.S.C. 1692e by using false,  
23 deceptive, and misleading representations in connection with the collection of  
24 Plaintiff's alleged debts. This section is incorporated into the RFDCPA  
25 through Cal. Civ. Code 1788.17; thus, Defendant also violated Cal. Civ. Code  
26 1788.17.
- 27  
28

1 40. This communication to Plaintiff was a “communication” as that term is  
2 defined by 15 U.S.C. § 1692a(2), and an “initial communication” consistent  
3 with 15 U.S.C. § 1692g(a).

4 **CAUSES OF ACTION**

5 **CLASS ACTION ALLEGATIONS**

6 41. Plaintiff brings this action on behalf of herself and on behalf of and all others  
7 similarly situated (the “Class”). The proposed Class that Plaintiff seeks to  
8 represent are defined as follows:

- 9 • (i) All persons with addresses within the State of California; (ii) who  
10 were sent one or more collection letter(s) by Defendant; (iii) to recover  
11 a consumer debt (iv) which was not returned undeliverable by the  
12 United States Postal Service; (vii) at any time one year prior to the date  
13 of the filing of this action; (viii) which stated the following:

14 (a) “This has been reported or is scheduled to be reported to one  
15 or all of the following three national credit reporting bureaus;”

16 (b) “a negative credit report reflecting on your credit record may  
17 be submitted to a credit reporting agency if you fail to fulfill the  
18 terms of your credit obligations;”

19 (c) “Should you elect to make a payment by MoneyGram,  
20 Western Union, or a credit card, a separate fee will be charged to  
21 you by the payment service provider or processor.”

22 42. Defendant, its employees and agents are excluded from The Class. Plaintiff  
23 does not know the number of members in The Class, but believes The Class  
24 members number in the tens of thousands, if not more. Thus, this matter  
25 should be certified as a Class Action to assist in the expeditious litigation of  
26 this matter.

27 43. Plaintiff and members of The Class were harmed by the acts of Defendant in  
28 at least the following ways:



- Defendant illegally contacted Plaintiff and The Class members by way of their cellular telephones thereby causing Plaintiff and The Classmembers to incur certain cellular telephone charges or reduce cellular telephone time for which Plaintiff and The Class members previously paid, by having to retrieve or administer messages left by Defendant during those illegal calls, and by invading the privacy of said Plaintiff and The Class members. Plaintiff and The Class were damaged thereby.

44. This suit seeks only damages and injunctive relief for recovery of economic injury on behalf of The Class and it expressly is not intended to request any recovery for personal injury and claims related thereto. Plaintiff reserves the right to expand The Class definitions to seek recovery on behalf of additional persons as warranted as facts are learned in further investigation and discovery.

45. The joinder of The Class members is impractical and the disposition of their claims in the Class action will provide substantial benefits both to the parties and to the court. The Class can be identified through Defendant's records.

46. There is a well-defined community of interest in the questions of law and fact involved affecting the parties to be represented. The questions of law and fact to The Class predominate over questions which may affect individual Class members, including, but not limited to, the following:

- Whether Defendant's letter violated the FDCPA;
- Whether Plaintiff and The Class were damaged thereby, and the extent of damages for such violation;
- Whether members of the Class are entitled to an award of reasonable attorneys' fees and costs of suit pursuant to the FDCPA;
- Whether Defendant should be enjoined from engaging in such conduct in the future; and,





- 1 • Whether Defendant can satisfy the bona fide error affirmative defense;.
- 2 47. As a person that received at least one written communication from Defendant
- 3 in violation of fair debt collection laws, Plaintiff is asserting claims that are
- 4 typical of the Class.
- 5 48. Plaintiff and the members of The Class have all suffered irreparable harm as a
- 6 result of the Defendant's unlawful and wrongful conduct. Absent a class
- 7 action, The Class will continue to face the potential for irreparable harm. In
- 8 addition, these violations of law will be allowed to proceed without remedy
- 9 and Defendant will likely continue such illegal conduct. Because of the size
- 10 of the individual Class and member's claims, few, if any, The Classmembers
- 11 could afford to seek legal redress for the wrongs complained of herein.
- 12 49. Plaintiff has retained counsel experienced in handling class action claims and
- 13 claims involving consumer actions and violations of the Fair Debt Collection
- 14 50. A class action is a superior method for the fair and efficient adjudication of
- 15 this controversy. Class-wide damages are essential to induce Defendant to
- 16 comply with federal and California law. The interest of Class members in
- 17 individually controlling the prosecution of separate claims against Defendant
- 18 is small because the maximum statutory damages in an individual action for
- 19 violation of privacy are minimal. Management of these claims is likely to
- 20 present significantly fewer difficulties than those presented in many class
- 21 claims.
- 22 51. Defendant has acted on grounds generally applicable to The Class, thereby
- 23 making appropriate final injunctive relief and corresponding declaratory relief
- 24 with respect to the Class as a whole.

25 //

26 //

27 //

28 //



**COUNT I**

**FAIR DEBT COLLECTION PRACTICES ACT (FDCPA)**

**15 U.S.C. §§ 1692 ET SEQ.**

52. Plaintiff repeats, re-alleges, and incorporates by reference, all other paragraphs.

53. The foregoing acts and omissions constitute numerous and multiple violations of the FDCPA, including but not limited to each and every one of the above-cited provisions of the FDCPA, 15 U.S.C. § 1692 et seq.

54. As a result of each and every violation of the FDCPA, Plaintiff is entitled to any actual damages pursuant to 15 U.S.C. § 1692k(a)(1); statutory damages in an amount up to \$1,000.00 pursuant to 15 U.S.C. § 1692k(a)(2)(A); and, reasonable attorney’s fees and costs pursuant to 15 U.S.C. § 1692k(a)(3) from Defendant.

**COUNT II**

**ROSENTHAL FAIR DEBT COLLECTION PRACTICES ACT (ROSENTHAL ACT)**

**CAL. CIV. CODE §§ 1788-1788.32**

55. Plaintiff repeats, re-alleges, and incorporates by reference, all other paragraphs.

56. The foregoing acts and omissions constitute numerous and multiple violations of the Rosenthal Act, including but not limited to each and every one of the above-cited provisions of the Rosenthal Act, Cal. Civ. Code § 1788-1788.32.

As a result of each and every violation of the Rosenthal Act, Plaintiff is entitled to any actual damages pursuant to Cal. Civ. Code § 1788.30(a); statutory damages for a knowing or willful violation in the amount up to \$1,000 pursuant to Cal. Civ. Code § 1788.30(b); and reasonable attorney’s fees and costs pursuant to Cal. Civ. Code § 1788.30(c) from Defendant.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff prays that judgment be entered against Defendant, and

1 Plaintiff be awarded damages from Defendant, as follows:

- 2 • An award of actual damages pursuant to 15 U.S.C. § 1692k(a)(1);
- 3 • An award of statutory damages of \$1,000.00 pursuant to 15 U.S.C. §  
4 1692k(a)(2)(A);
- 5 • An award of costs of litigation and reasonable attorney’s fees, pursuant  
6 to 15 U.S.C. § 1692k(a)(3).
- 7 • An award of actual damages pursuant to California Civil Code §  
8 1788.30(a);
- 9 • An award of statutory damages of \$1,000.00 pursuant to Cal. Civ. Code  
10 § 1788.30(b);
- 11 • An award of costs of litigation and reasonable attorney’s fees, pursuant  
12 to Cal. Civ. Code § 1788.30(c).

13 57. Pursuant to the seventh amendment to the Constitution of the United States of  
14 America, Plaintiff is entitled to, and demands, a trial by jury.

15  
16 Respectfully submitted,

**Hyde & Swigart**

17  
18  
19 Friday, February 10, 2017

By: /s/ Joshua B. Swigart  
Joshua B. Swigart  
Attorneys for Plaintiff



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

Florence Morris, individually and on behalf of 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) Joshua B. Swigart, Esq. (225557); Veronica McKnight, Esq. (306562) Hyde & Swigart (619) 233-7770 2221 Camino Del Rio South, Suite 101, San Diego, CA 92108

DEFENDANTS

Hunter Warfield

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)

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, 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): 15 U.S.C. §§ 1692 et seq. Brief description of cause: Violations of the Fair Debt Collection Practices 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 02/10/2017 SIGNATURE OF ATTORNEY OF RECORD s/Joshua B. Swigart

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: [Hunter Warfield, Inc. Hit with Debt Collection Class Action](#)

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