

KAZEROUNI LAW GROUP, APC  
245 FISCHER AVENUE, UNIT D1  
COSTA MESA, CA 92626

**KAZEROUNI LAW GROUP, APC**  
Abbas Kazerounian, Esq. (249203)  
ak@kazlg.com  
Matthew M. Loker, Esq. (279939)  
ml@kazlg.com  
245 Fischer Avenue, Unit D1  
Costa Mesa, CA 92626  
Telephone: (800) 400-6808  
Facsimile: (800) 520-5523

**LAW OFFICE OF DANIEL G. SHAY**  
Daniel G. Shay, Esq. (250548)  
danielshay@tcpafdcpa.com  
409 Camino Del Rio South, Suite 101B  
San Diego, CA 92108  
Telephone: (619) 222-7249  
Facsimile: (866) 431-3292

**HYDE & SWIGART**  
Joshua B. Swigart, Esq. (225557)  
josh@westcoastlitigation.com  
2221 Camino Del Rio South, Ste. 101  
San Diego, CA 92108  
Telephone: (619) 233-7770  
Facsimile: (619) 297-1022

*Attorneys for Plaintiff,*  
Russell Smith

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

**RUSSELL SMITH,  
INDIVIDUALLY AND ON  
BEHALF OF ALL OTHERS  
SIMILARLY SITUATED,**

Plaintiff,

v.

**HUNT & HENRIQUES, INC.,**

Defendant.

**Case No.: '16CV3048 CAB JLB**

**CLASS ACTION**

**COMPLAINT FOR DAMAGES FOR  
VIOLATION OF:**

**(1) THE FAIR DEBT  
COLLECTION PRACTICES  
ACT 15 U.S.C. § 1692, ET  
SEQ.; AND,**

**(2) THE ROSENTHAL FAIR  
DEBT COLLECTION  
PRACTICES ACT, CAL. CIV.  
CODE § 1788, ET SEQ.**

**JURY TRIAL DEMANDED**

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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, 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.<sup>1</sup>
3. RUSSELL SMITH (“Plaintiff”), by Plaintiff’s attorneys, brings this class action to challenge the actions of HUNT & HENRIQUES, INC. (“Defendant”) with regard to attempts by Defendant, debt collectors, to unlawfully and abusively collect a debt allegedly owed by Plaintiff, and this conduct caused Plaintiff damages.

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<sup>1</sup> Cal. Civ. Code §§ 1788.1 (a)-(b)

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1 4. Plaintiff makes these allegations on information and belief, with the exception  
2 of those allegations that pertain to a plaintiff, or to a plaintiff’s counsel, which  
3 Plaintiff alleges on personal knowledge.

4 5. While many violations are described below with specificity, this Complaint  
5 alleges violations of the statute cited in its entirety.

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

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

11 8. Unless otherwise indicated, the use of Defendant’s name in this Complaint  
12 includes all agents, employees, officers, members, directors, heirs, successors,  
13 assigns, principals, trustees, sureties, subrogees, representatives, and insurers  
14 of Defendant’s named.

15 **JURISDICTION AND VENUE**

16 9. Jurisdiction of this Court arises pursuant to 28 U.S.C. § 1331; 15 U.S.C. §  
17 1692(k); and, 28 U.S.C. § 1367 for supplemental state claims.

18 10. This action arises out of Defendant’s violations of (1) the Fair Debt Collection  
19 Practices Act, 15 U.S.C. § 1692, et seq. (“FDCPA”); and, (2) the Rosenthal  
20 Fair Debt Collection Practices Act, Cal. Civ. Code § 1788, et seq.  
21 (“RFDCPA”).

22 11. Because Defendant conducts business within the State of California, personal  
23 jurisdiction is established.

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1 12. Venue is proper in the United States District Court, Southern District of  
2 California pursuant to 28 U.S.C. § 1391 for the following reasons: (i) Plaintiff  
3 resides in the County of San Diego, State of California which is within this  
4 judicial district; (ii) the conduct complained of herein occurred within this  
5 judicial district; and, (iii) Defendant conducted business within this judicial  
6 district at all times relevant.

7 **PARTIES**

8 13. Plaintiff is a natural person who resides in the County of San Diego, State of  
9 California, from whom a debt collector sought to collect a consumer debt  
10 which was due and owing or alleged to be due and owing from Plaintiff, and  
11 is a “debtor” as that term is defined by California Civil Code § 1788.2(h). In  
12 addition, Plaintiff is a “consumer” as that term is defined by 15 U.S.C. §  
13 1692a(3).

14 14. Plaintiff is informed and believes, and thereon alleges, that Defendant is an  
15 entity whose State of Incorporation and principal place of business is in the  
16 County of San Jose, State of California.

17 15. Plaintiff is informed and believes, and thereon alleges, that Defendant, in the  
18 ordinary course of business, regularly, on behalf of themselves or others,  
19 engage in debt collection as that term is defined by California Civil Code §  
20 1788.2(b), and is therefore a “debt collector” as that term is defined by  
21 California Civil Code § 1788.2(c) and 15 U.S.C. § 1692a(6).

22 16. This case involves money, property or their equivalent, due or owing or  
23 alleged to be due or owing from a natural person by reason of a consumer  
24 credit transaction. As such, this action arises out of a “consumer debt” and  
25 “consumer credit” as those terms are defined by Cal. Civ. Code § 1788.2(f)  
26 and a “debt” as that term is defined by 15 U.S.C. 1692a(5).

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**FACTUAL ALLEGATIONS**

17. At all times relevant, Plaintiff is an individual residing within the State of California.

18. Plaintiff is informed and believes, and thereon alleges, that at all times relevant, Defendant conducted business in the State of California.

19. In or about 2010, Plaintiff allegedly incurred financial obligations to the original creditor, Capital One Bank (USA) N.A., that were money, property, or their equivalent, which is due or owing, or alleged to be due or owing, from a natural person to another person and were therefore “debt(s)” and a “consumer debt” as the terms are defined by 15 U.S.C. § 1692a(6); and, California Civil Code §1788.2(f).

20. Subsequently, the alleged debt was allegedly assigned, placed, or otherwise transferred, to Defendant for collection.

21. In this regard, Defendant sent Defendant’s initial written communication to Plaintiff on or about August 9, 2016.

22. Said initial written communication, in part, stated the following:

*Federal law gives you 30 days after you receive this letter to dispute the validity of the debt or any portion of it. If you do not dispute the validity of the debt or any portion of it within that period, we will assume that the debt is valid. If you do dispute the debt, or any portion of it, in writing – by mailing a notice to this firm to that effect on or before the 30th day following the date you receive this letter – we will obtain verification of the debt or a copy of a judgment against you and mail a copy of such verification or judgment to you. And if, within the same period, you request in writing the name and address of the original creditor (if different from the current creditor), we will provide that information to you.*

23. Specifically at issue herein is Defendant’s requirement that Plaintiff submit any written dispute via mail only.

24. By requiring written disputes to be mailed, Defendant is illegally placing additional burdens on Plaintiff since any written dispute, regardless of how the written dispute is transmitted, is valid.

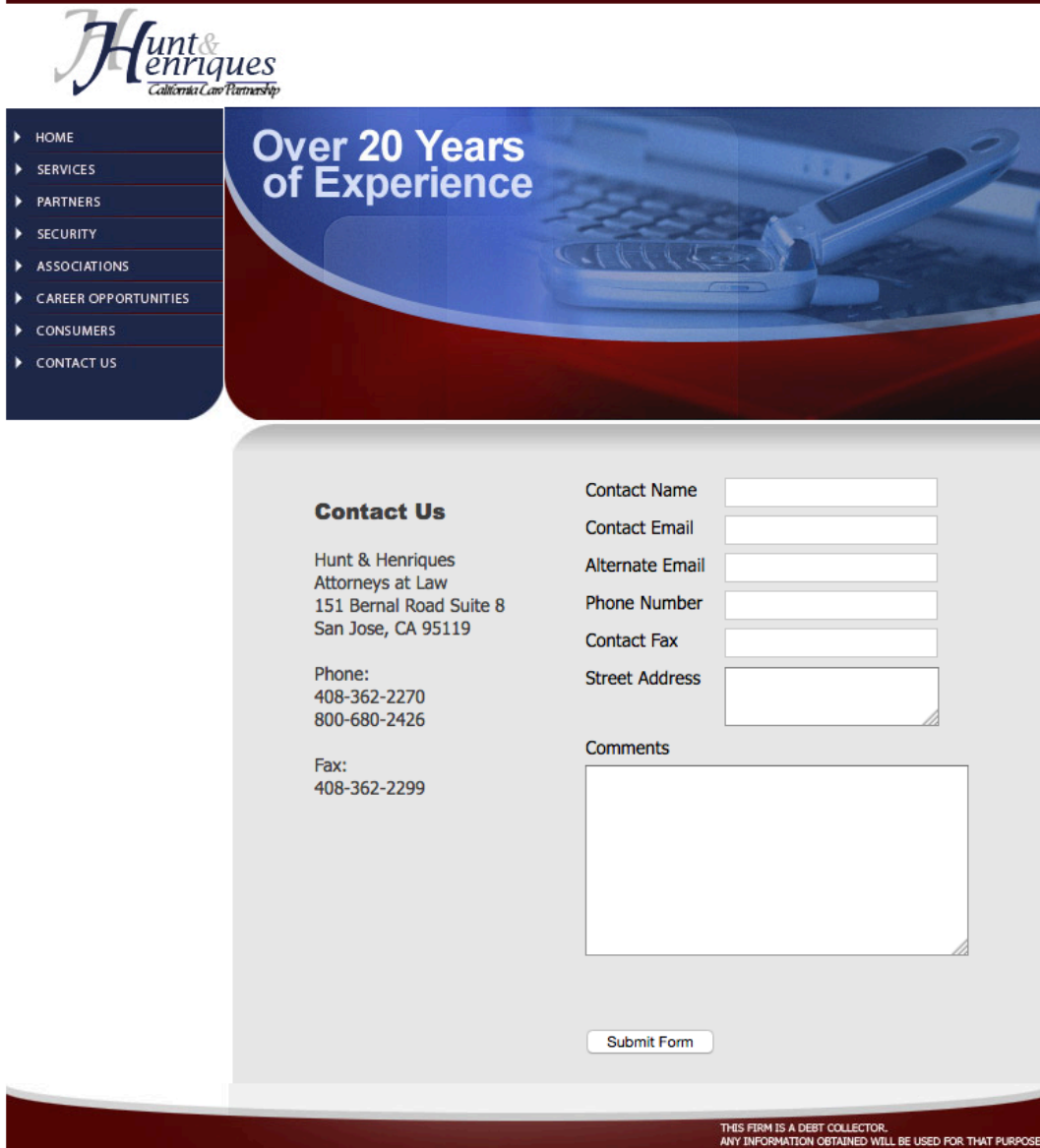
25. Not only does a mailed dispute cost Plaintiff money, but it also takes more time than other written methods of transmitting a dispute, such as facsimile, email and/or online submission.

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1 26. The purpose of 15 U.S.C. § 1692g is to ensure that consumers are made aware  
2 of their rights with respect to debt collection activities.<sup>2</sup>

3 27. This burden creates an unnecessary obstruction for consumers that wish to  
4 utilize their rights as delineated by the FDCPA.

5 28. Similarly, the mailing requirement would also prohibit consumers from  
6 utilizing written dispute methods publically available on Defendant's  
7 website.<sup>3</sup>



27 <sup>2</sup> *Higgins v. Capital Credit Services, Inc.*, 762 F. Supp. 1128, 1134 (1991).

28 <sup>3</sup> See <http://www.hunthenriques.com/contact.html>

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1 29. Defendant’s statement is likely to mislead the least sophisticated consumer  
2 since said statement places an unnecessary and inappropriate burden on the  
3 consumer to dispute the debt in only one method while concealing that other  
4 methods of written disputes are sufficient.

5 30. Through this conduct, Defendant violated 15 U.S.C. § 1692e by using false,  
6 deceptive and misleading representations in connection with the collection of  
7 Plaintiffs’ alleged debts. This section is incorporated into the RFDCPA  
8 through Cal. Civ. Code § 1788.17; thus, Defendant also violated Cal. Civ.  
9 Code § 1788.17.

10 31. Through this conduct, Defendant violated 15 U.S.C. § 1692e(10) by using  
11 false representations and deceptive means to collect Plaintiffs’ alleged debt.  
12 This section is incorporated into the RFDCPA through Cal. Civ. Code §  
13 1788.17; thus, Defendant also violated Cal. Civ. Code § 1788.17.

14 32. Through this conduct, Defendant violated 15 U.S.C. § 1692g by failing to  
15 include the proper debt verification procedures. This section is incorporated  
16 into the RFDCPA through Cal. Civ. Code § 1788.17; thus, Defendant also  
17 violated Cal. Civ. Code § 1788.17.

18 **CLASS ALLEGATIONS**

19 33. Plaintiff brings this action on behalf of himself individually, and on behalf of  
20 all others similarly situated (“the Classes”).

21 34. Plaintiff represents, and is a member of the FDCPA Class, defined as follows:  
22 (i) all persons with addresses within the United States; (ii) who  
23 were sent one or more collection letter(s) by Defendant; (iii) to  
24 recover a consumer debt; (iv) that restricted written disputes to  
25 be sent via mail only; (iv) which was not returned undeliverable  
26 by the United States Postal Service; (v) at any time one year  
27 prior to the date of the filing of this Action.  
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1 35. Plaintiff represents, and is a member of the RFDCPA Class, defined as  
2 follows:

3 (i) all persons with addresses within the State of California (ii)  
4 who were sent one or more collection letter(s) by Defendant;  
5 (iii) to recover a consumer debt; (iv) that restricted written  
6 disputes to be sent via mail only; (iv) which was not returned  
undeliverable by the United States Postal Service; (v) at any  
time one year prior to the date of the filing of this Action

7 36. Defendant and its employees or agents are excluded from the Classes.

8 37. Plaintiff does not know the exact number of persons in the Classes, but  
9 believe them to be in the several hundreds, if not thousands, making joinder of  
10 all these actions impracticable.

11 38. The joinder of the Classes members is impractical and the disposition of their  
12 claims in the Classes action will provide substantial benefits both to the  
13 parties and to the court. The identity of the individual members is  
14 ascertainable through Defendant's and/or Defendant's agents' records or by  
15 public notice.

16 39. There is a well-defined community of interest in the questions of law and fact  
17 involved affecting the members of the Classes. The questions of law and fact  
18 common to the Classes predominate over questions affecting only individual  
19 class members, and include, but are not limited to, the following:

- 20 a. Whether Defendant's letter violated the FDCPA;  
21 b. Whether Defendant's letter violated the RFDCPA;  
22 c. Whether members of the Classes are entitled to the remedies under the  
23 FDCPA;  
24 d. Whether members of the Classes are entitled to the remedies under the  
25 RFDCPA;  
26 e. Whether members of the Classes are entitled to declaratory relief  
27 pursuant to the FDCPA;  
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- 1 f. Whether members of the Classes are entitled to declaratory relief
- 2 pursuant to the RFDCPA;
- 3 g. Whether members of the Classes are entitled to injunctive relief
- 4 pursuant to the FDCPA;
- 5 h. Whether members of the Classes are entitled to injunctive relief
- 6 pursuant to the RFDCPA;
- 7 i. Whether members of the Classes are entitled to an award of
- 8 reasonable attorneys' fees and costs of suit pursuant to the FDCPA;
- 9 j. Whether members of the Classes are entitled to an award of
- 10 reasonable attorneys' fees and costs of suit pursuant to the RFDCPA;
- 11 k. Whether Defendant can satisfy the bona fide error affirmative defense
- 12 pursuant to the FDCPA; and,
- 13 l. Whether Defendant can satisfy the bona fide error affirmative defense
- 14 pursuant to the RFDCPA.

15 40. As a person that received at least one written communication from Defendant  
16 in violation of Federal and State fair debt collection laws, Plaintiff is asserting  
17 claims that are typical of the Classes.

18 41. Plaintiff will fairly and adequately protect the interests of the Classes.

19 42. Plaintiff has retained counsel experienced in consumer class action litigation  
20 and in handling claims involving unlawful debt collection practices.

21 43. Plaintiff's claims are typical of the claims of the Classes, which all arise from  
22 the same operative facts involving unlawful collection practices.

23 44. A class action is a superior method for the fair and efficient adjudication of  
24 this controversy. Class-wide damages are essential to induce Defendant to  
25 comply with California law. The interest of class members in individually  
26 controlling the prosecution of separate claims against Defendant is small  
27 because the maximum statutory damages in an individual action under the  
28 FDCPA and/or are \$1,000. Management of these claims is likely to present

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1 significantly fewer difficulties than those presented in many class claims, e.g.,  
2 securities fraud.

3 45. Defendant has acted on grounds generally applicable to the Classes, thereby  
4 making appropriate final declaratory relief with respect to the Classes as a  
5 whole.

6 46. Plaintiff contemplates providing notice to the putative class members by direct  
7 mail in the form of a postcard and via Internet website.

8 47. Plaintiff requests certification of a hybrid class for monetary damages and  
9 injunctive relief.

10 **COUNT I**

11 **VIOLATION OF THE FAIR DEBT COLLECTION PRACTICES ACT**

12 **15 U.S.C. §§ 1692, ET SEQ. (FDCPA)**

13 **[AGAINST ALL DEFENDANTS]**

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

16 49. The foregoing acts and omissions constitute numerous and multiple violations  
17 of the FDCPA.

18 50. As a result of each and every violation of the FDCPA, Plaintiff, and the  
19 putative class members, are entitled to any actual damages pursuant to 15  
20 U.S.C. § 1692k(a)(1); statutory damages for a knowing or willful violation in  
21 the amount up to \$1,000.00 pursuant to 15 U.S.C. § 1692k(a)(2)(A); and  
22 reasonable attorney’s fees and costs pursuant to 15 U.S.C. § 1692k(a)(3) from  
23 each Defendant individually.

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**COUNT II**

**VIOLATION OF THE ROSENTHAL FAIR DEBT COLLECTION PRACTICES ACT**

**CAL. CIV. CODE §§ 1788, ET SEQ. (RFDCPA)**

**[AGAINST ALL DEFENDANTS]**

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

52. The foregoing acts and omissions constitute numerous and multiple violations of the FDCPA.

53. As a result of each and every violation of the RFDCPA, Plaintiff, and the members of the Class, are 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 \$1,000.00 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 on behalf of each putative class member as follows:

- That this action be certified as a class action on behalf of the Classes as requested herein;
- That Plaintiff be appointed as representative of the Classes;
- That Plaintiff’s counsel be appointed as counsel for the Classes;
- An award of actual damages, in an amount to be determined at trial, pursuant to 15 U.S.C. § 1692k(a)(1), for each plaintiff and putative class member;
- An award of actual damages, in an amount to be determined at trial, pursuant to Cal. Civ. Code § 1788.30(a), for each plaintiff and putative class member;

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- An award of statutory damages of \$1,000.00, pursuant to 15 U.S.C. § 1692k(a)(2)(A), for each plaintiff and putative class member;
- An award of statutory damages of \$1,000.00, pursuant to Cal. Civ. Code § 1788.30(b), for each plaintiff and putative class member;
- An award of costs of litigation and reasonable attorney’s fees, pursuant to 15 U.S.C. § 1692k(a)(3), against Defendant;
- An award of costs of litigation and reasonable attorney’s fees, pursuant to Cal. Civ. Code § 1788.30(c); and,
- Any and all other relief that this Court deems just and proper.

**TRIAL BY JURY**

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

Dated: December 16, 2016

Respectfully submitted,

**KAZEROUNI LAW GROUP, APC**

By:         /s/ Matthew M. Loker          
MATTHEW M. LOKER, ESQ.  
ATTORNEY 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
RUSSELL SMITH, INDIVIDUALLY AND ON BEHALF OF ALL OTHERS SIMILARLY SITUATED,

DEFENDANTS
HUNT & HENRIQUES, INC.,

(b) County of Residence of First Listed Plaintiff San Diego
(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)
Matthew M. Loker, Esq. (SBN: 279939)
KAZEROUNI LAW GROUP, APC
245 Fischer Avenue, Unit D1, Costa Mesa, CA 92626 (800) 400-6808

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)

- Citizen of This State
Citizen of Another State
Citizen or Subject of a Foreign Country
PTF DEF
1 1 Incorporated or Principal Place of Business In This State
2 2 Incorporated and Principal Place of Business In Another State
3 3 Foreign Nation
4 4
5 5
6 6

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

Table with 5 columns: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES. Includes various legal categories like Insurance, Personal Injury, Real Estate, etc.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding
2 Removed from State Court
3 Remanded from Appellate Court
4 Reinstated or Reopened
5 Transferred from Another District
6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
15 U.S.C. § 1692; and, 28 U.S.C. § 1367
Brief description of cause:
Plaintiff alleges violations of the FDCPA; and, RFDCPA on a class action basis.

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

DATE 12/16/2016 SIGNATURE OF ATTORNEY OF RECORD /s/ Matthew M. Loker

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 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: [Hunt & Henriques Slapped with FDCPA Class Action](#)

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