

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

Monica Stephens, <i>on behalf of</i>	)	
<i>herself and others similarly situated,</i>	)	Civil Action No.:
	)	
Plaintiff,	)	Jury Trial Demanded
	)	
v.	)	
	)	
Alltran Financial, LP,	)	
	)	
Defendant.	)	
_____	)	

**CLASS ACTION COMPLAINT**

**Nature of this Action**

1. Monica Stephens (“Plaintiff”) brings this class action against Alltran Financial, LP (“Defendant”) under the Telephone Consumer Protection Act (“TCPA”), 47 U.S.C. § 227, and the Fair Debt Collection Practices Act (“FDCPA”), 15 U.S.C. § 1692 *et seq.*

2. Upon information and good faith belief, Defendant routinely violates 47 U.S.C. § 227(b)(1)(A)(iii) by using an automatic telephone dialing system to place non-emergency calls to numbers assigned to a cellular telephone service, without prior express consent.

3. Upon information and good faith belief, Defendant routinely violates 15 U.S.C. § 1692d by engaging in conduct the natural consequence of which is to harass, oppress, or abuse consumers in connection with the collection of debts.

**Jurisdiction and Venue**

4. This Court has subject matter jurisdiction under 47 U.S.C. § 227(b)(3), 15 U.S.C. § 1692k(d), and 28 U.S.C. § 1331.

5. Venue is proper before this Court under 28 U.S.C. § 1391(b) as the acts and

transactions giving rise to Plaintiff's action occurred, in part, in this district, and as Defendant transacts business in this district.

### Parties

6. Plaintiff is natural person who at all relevant times resided in Atlanta, Georgia.
7. Plaintiff is a "consumer" as defined by 15 U.S.C. § 1692a(3).
8. Defendant is an entity headquartered in Houston, Texas.
9. Defendant "specializes in revenue cycle, accounts receivable, and contact center solutions within healthcare, financial services, higher education, and government industries[.]" <https://www.bloomberg.com/research/stocks/private/snapshot.asp?privcapid=6500002> (last visited June 26, 2017).

10. Defendant is an entity that at all relevant times was engaged, by use of the telephone, in the business of attempting to collect a "debt"—in default—as defined by 15 U.S.C. § 1692a(5).

11. Defendant is a "debt collector" as defined by 15 U.S.C. § 1692a(6).

12. Defendant's website includes a statement that reads:

We understand that you may provide to Alltran through this Site, some information about yourself that you consider confidential. You may also provide certain financial information, such as credit card information. You agree to our collection, use and sharing of information as described in our Privacy Policy. You specifically agree that we may contact you through any contact information provided by you, including email, text, fax, telephone, mail, or any other method, and that provision of such information constitutes full and sufficient by you under all laws and regulations. *Your consent includes permission for us to utilize different methods of contacting you including use of an auto dialer to call you, texts, prerecorded messages, e-mail or other means.*

<http://alltran.com/terms/> (last visited June 26, 2017) (emphasis added).

13. Defendant's website also includes a statement that reads:

To better serve our clients, we have selected the right mix of technology to maximize internal operational efficiency and client reporting. Alltran is supported by several collection-specific technologies provided by Ontario Systems. This flexible, configurable system offers our clients the following key elements:

- First Party Collection provided by Artiva Healthcare
- Third Party Collection provided by Artiva Agency
- *Telephony – Predictive dialers, call routing, and call management logistics*
- Networking – Cisco and Juniper routing, switching, firewall controls, and VPNs
- Compliant Management Applications
- SAS Analytics Platform
- Workstations – Windows 7 & 8
- Servers – Microsoft Windows Server 2008, 2012, and Red Hat Enterprise Linux 6
- Services – Secure FTP (SFTP), Secure Email (Zix), Secure Access (SecureLink)
- Network Security – TippingPoint intrusion detection, Sophos Web Filtering
- Workstation Security – Microsoft EMET, Sophos Anti-Malware
- Monitoring – AlienVault, PRTG, Foglight, Tenable Nessus External Scanning
- Data Management Platform
- Digital call recording

<http://alltran.com/industries/healthcare/technology/> (last visited June 26, 2017) (emphasis added).

14. Defendant's former dialer operations manager's LinkedIn profile reads, in part:

Manager Dialer Operations/Client Analyst  
Company Name Alltran  
Dates Employed Apr 2015 – Present

Employment Duration 2 yrs 3 mos

Responsible for management and implementation of all predictive and agentless dialer campaigns. Overseas a team of Dialer operators who run and monitor day to day operations of all dialer campaigns.

Works closely with IT department to create and implement new strategies. Works closely with telephony department to troubleshoot campaign and ACD issues.

Point of contact for all dialer related enquires. Works closely with senior management to implement, and recommend [sic] dialer and contact strategy.

Manages ACD queues and makes strategic recommendations [sic] of call routing to maximize efficiency.

Develop reports based on client metrics. Analyse [sic] internal control reports and provide root cause to fortune 500 clients.

<https://www.linkedin.com/in/james-stauber-469199103/> (last visited June 26, 2017)

### **Factual Allegations**

15. Sometime in 2017, Defendant began placing calls to Plaintiff's cellular telephone number—(770) 729-XXXX.

16. For example, Defendant placed at least one call to Plaintiff's cellular telephone number on March 24, 2017, March 29, 2017, April 3, 2017, and April 17, 2017.

17. Upon information and good faith belief, Defendant placed additional calls to Plaintiff's cellular telephone number.

18. Defendant placed calls to Plaintiff's cellular telephone number from (281) 901-6991 and (832) 615-8408—both of which play a recording when dialed that states: "Thank you for calling Alltran Financial . . . ."

19. Defendant's calls were intended for someone other than Plaintiff.

20. Defendant also left voice messages with Plaintiff's cellular telephone voice message service.

21. Defendant's voice messages were intended for someone other than Plaintiff.

22. Plaintiff returned a number of Defendant's calls.

23. On approximately three separate occasions Plaintiff spoke with Defendant, informed Defendant that she was not the individual it was attempting to reach, and asked Defendant to stop placing calls to her cellular telephone number.

24. Defendant responded by agreeing to take Plaintiff's cellular telephone number off of its call list.

25. Defendant, nonetheless, continued to place calls to Plaintiff's cellular telephone number.

26. Upon information and good faith belief, and in light of the frequency, number, nature, and character of the calls, Defendant placed its calls to Plaintiff's cellular telephone number by using an automatic telephone dialing system.

27. Upon information and good faith belief, and in light of the frequency, number, nature, and character of the calls, Defendant placed its calls to Plaintiff's cellular telephone number by using equipment which has the capacity (i) to store or produce telephone numbers to be called, using a random or sequential number generator, and (ii) to dial such numbers.

28. Upon information and good faith belief, and in light of the frequency, number, nature, and character of the calls, Defendant placed its calls to Plaintiff's cellular telephone number by using (i) an automated dialing system that uses a complex set of algorithms to automatically dial consumers' telephone numbers in a manner that "predicts" the time when a consumer will answer the phone and a person will be available to take the call, or (ii) equipment that dials numbers and, when certain computer software is attached, also assists persons in predicting when a sales agent will be available to take calls, or (iii) hardware, that when paired with certain software, has the capacity to store or produce numbers and dial those numbers at random, in sequential order, or from a database of numbers, or (iv) hardware, software, or equipment that the FCC characterizes as a predictive dialer through the following, and any related, reports and orders, and declaratory rulings: *In the Matter of Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991*, 17 FCC Rcd 17459, 17474 (September 18, 2002); *In the Matter of Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991*, 18 FCC Rcd 14014, 14092-93 (July 3, 2003); *In the Matter of Rules and Regulations Implementing the*

*Telephone Consumer Protection Act of 1991*, 23 FCC Rcd 559, 566 (Jan. 4, 2008); *In the Matter of Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991*, FCC 15-72 (adopted June 18, 2015 and released July 10, 2015).

29. Plaintiff is not, nor was, one of Defendant's customers.

30. Plaintiff does not have, nor had, a business relationship with Defendant.

31. Plaintiff did not provide Defendant with her cellular telephone number.

32. Plaintiff did not give Defendant prior express consent to place calls to her cellular telephone number by using an automatic telephone dialing system.

33. Upon information and good faith belief, Defendant placed its calls to Plaintiff's cellular telephone number for non-emergency purposes.

34. Upon information and good faith belief, Defendant placed its calls to Plaintiff's cellular telephone number in connection with its attempt to collect a consumer debt in default.

35. Upon information and good faith belief, Defendant placed its calls to Plaintiff's cellular telephone number voluntarily.

36. Upon information and good faith belief, Defendant placed its calls to Plaintiff's cellular telephone number under its own free will.

37. Upon information and good faith belief, Defendant had knowledge that it was using an automatic telephone dialing system to place its calls to Plaintiff's cellular telephone number.

38. Upon information and good faith belief, Defendant intended to use an automatic telephone dialing system to place the calls to Plaintiff's cellular telephone number.

39. Upon information and good faith belief, Defendant maintains business records that show all calls it placed to Plaintiff's cellular telephone number.

40. Plaintiff suffered actual harm as a result Defendant's calls in that she suffered an invasion of privacy, an intrusion into her life, and a private nuisance.

41. As well, Defendant's calls at issue depleted or consumed, directly or indirectly, cellular telephone minutes for which Plaintiff paid a third party.

42. Moreover, Defendant's calls at issue unnecessarily tied up Plaintiff's cellular telephone line.

43. Upon information and good faith belief, Defendant, as a matter of pattern and practice, uses an automatic telephone dialing system to place calls to telephone numbers assigned to a cellular telephone service.

### **Class Allegations**

44. Plaintiff brings this action under Federal Rule of Civil Procedure 23, and as a representative of the following two classes:

*TCPA class:* All persons and entities throughout the United States (1) to whom Alltran Financial, LP placed, or caused to be placed, more than one call (2) directed to a number assigned to a cellular telephone service, but not assigned to the intended recipient of Alltran Financial, LP's calls—in that the intended recipient of the calls was not a subscriber to, or customary user of, the telephone number, (3) by using an automatic telephone dialing system or an artificial or prerecorded voice, (4) within four years preceding the date of this complaint though the date of class certification.

*FDCPA class:* All persons throughout the United States (1) to whom Alltran Financial, LP placed, or caused to be placed, calls, (2) within one year preceding the date of this complaint through the date of class certification, (3) and in connection with the collection of a consumer debt, (4) where the person called by Alltran Financial, LP was not the person alleged to owe the debt.

45. The proposed classes specifically exclude the United States of America, the State of Georgia, counsel for the parties, the presiding United States District Court Judge, the Judges of the United States Court of Appeals for the Eleventh Circuit, the Justices of the United States

Supreme Court, any entity in which Defendant has or had a controlling interest, all officers and agents of Defendant, and all persons related to within the third degree of consanguinity or affection to any of the foregoing individuals.

46. Upon information and belief, the members of the classes are so numerous that joinder of all of them is impracticable.

47. The exact number of the members of the classes is unknown to Plaintiff at this time, and can be determined only through appropriate discovery.

48. The members of the classes are ascertainable because the classes are defined by reference to objective criteria.

49. In addition, the classes are ascertainable because, upon information and belief, cellular telephone numbers, names, and addresses of the members of the classes can be identified in business records maintained by Defendant and by third parties.

50. There exists a well-defined community of interest in the questions of law and fact that affect the members of the classes.

51. Plaintiff's claims are typical of the claims of the members of the classes.

52. As it did for all members of the classes, Defendant used an automatic telephone dialing system to place calls to Plaintiff's cellular telephone number, without prior express consent, and in violation of 47 U.S.C. § 227.

53. Plaintiff's claims, and the claims of the members of the classes, originate from the same conduct, practice and procedure on the part of Defendant.

54. Plaintiff's claims are based on the same theory as are the claims of the members of the classes.

55. Plaintiff suffered the same injuries as each of the members of the classes.



56. Plaintiff will fairly and adequately protect the interests of the members of the classes.

57. Plaintiff's interests in this matter are not directly or irrevocably antagonistic to the interests of the members of the classes.

58. Plaintiff will vigorously pursue the claims of the members of the classes.

59. Plaintiff has retained counsel experienced and competent in class action litigation.

60. Plaintiff's counsel will vigorously pursue this matter.

61. Plaintiff's counsel will assert, protect, and otherwise represent the members of the classes.

62. Questions of law and fact common to the members of the classes predominate over questions that may affect individual class members.

63. Issues of law and fact common to all members of the classes are:

- a. Defendant's violations of the TCPA;
- b. Defendant's violations of the FDCPA;
- c. Defendant's use of an automatic telephone dialing system as defined by the TCPA;
- d. Defendant's practice of calling wrong or reassigned phone numbers;
- e. The availability of statutory penalties; and
- f. The availability of attorneys' fees and costs.

64. A class action is superior to all other available methods for the fair and efficient adjudication of this matter.

65. If brought and prosecuted individually, the claims of the members of the classes would require proof of the same material and substantive facts.

66. The pursuit of separate actions by individual members of the classes would, as a practical matter, be dispositive of the interests of other members of the classes, and could substantially impair or impede their ability to protect their interests.

67. The pursuit of separate actions by individual members of the classes could create a risk of inconsistent or varying adjudications, which might establish incompatible standards of conduct for Defendant.

68. These varying adjudications and incompatible standards of conduct, in connection with presentation of the same essential facts, proof, and legal theories, could also create and allow the existence of inconsistent and incompatible rights within the classes.

69. The damages suffered by each individual member of the classes may be relatively small; thus, the expense and burden to litigate each of their claims individually make it difficult for the members of the classes to redress the wrongs done to them.

70. The pursuit of Plaintiff's claims, and the claims of the members of the classes, in one forum will achieve efficiency and promote judicial economy.

71. There will be little difficulty in the management of this action as a class action.

72. Defendant has acted or refused to act on grounds generally applicable to the members of the classes, making final declaratory or injunctive relief appropriate.

**Count I**  
**Violation of 47 U.S.C. § 227(b)(1)(A)(iii)**

73. Plaintiff repeats and re-alleges each and every factual allegation included in paragraphs 1-72.

74. Defendant violated 47 U.S.C. § 227(b)(1)(A)(iii) by using an automatic telephone dialing system to place non-emergency calls to Plaintiff's cellular telephone number, absent prior express consent.

**Count II**  
**Violation of 15 U.S.C. § 1692d**

75. Plaintiff repeats and re-alleges each and every factual allegation included in paragraph 1-72.

76. Defendant violated 15 U.S.C. § 1692d by engaging in conduct the natural consequence of which is to harass, oppress, or abuse Plaintiff in connection with the collection of a debt.

**Trial by Jury**

77. Plaintiff is entitled to, and hereby demands, a trial by jury.

WHEREFORE, Plaintiff prays for relief and judgment, as follows:

- a) Determining that this action is a proper class action;
- b) Designating Plaintiff as a class representative under Federal Rule of Civil Procedure 23;
- c) Designating Plaintiff's counsel as class counsel under Federal Rule of Civil Procedure 23;
- d) Adjudging and declaring that Defendant violated 47 U.S.C. § 227(b)(1)(A)(iii) and 15 U.S.C. § 1692d;
- e) Enjoining Defendant from continuing its violative behavior, including continuing to place calls to Plaintiff's cellular telephone number, and to the cellular telephone numbers of members of the proposed TCPA class.
- f) Awarding Plaintiff and the classes damages under 47 U.S.C. § 227(b)(3)(B) and 15 U.S.C. § 1692k(a)(1);
- g) Awarding Plaintiff and the classes treble damages under 47 U.S.C. § 227(b)(3);

- h) Awarding Plaintiff and the classes reasonable attorneys' fees, costs, and expenses under Rule 23 of the Federal Rules of Civil Procedure and 15 U.S.C. § 1692k(a)(1)(3);
- i) Awarding Plaintiff and the members of the classes any pre-judgment and post-judgment interest as may be allowed under the law; and
- j) Awarding such other and further relief as the Court may deem just and proper.

Date: July 10, 2017

/s/ Shireen Hormozdi  
Shireen Hormozdi  
1770 Indian Trail Lilburn Road  
Suite 175  
Norcross, GA 30093  
Tel: 678-395-7795  
Fax: 866-929-2434  
shireen@norcrosslawfirm.com

Aaron D. Radbil (*pro hac vice* application to be filed)  
Greenwald Davidson Radbil PLLC  
106 East Sixth Street, Suite 913  
Austin, Texas 78701  
Phone: (512) 322-3912  
Fax: (561) 961-5684  
aradbil@gdrllawfirm.com

Counsel for Plaintiff and the proposed classes

### **CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing was filed electronically on July 10, 2017, via the Court Clerk's CM/ECF system, which will provide notice to all counsel of record.

/s/ Shireen Hormozdi  
Shireen Hormozdi

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
Monica Stephens
(b) County of Residence of First Listed Plaintiff
(EXCEPT IN U.S. PLAINTIFF CASES)
(c) Attorneys (Firm Name, Address, and Telephone Number)
Shireen Hormozdi, 1770 Indian Trail Lilburn Road, Suite 175, Norcross, GA 30093, Tel: 678-395-7795, shireen@norcrosslawfirm.com

DEFENDANTS
Alltran Financial, LP
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)
(For Diversity Cases Only)
PTF DEF
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)
Click here for: Nature of Suit Code Descriptions.
CONTRACT
PERSONAL INJURY
REAL PROPERTY
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 USC 227 and 15 USC 1692
Brief description of cause:
Telephone Consumer Protection Act and Fair Debt Collection Practices Act

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 07/10/2017 SIGNATURE OF ATTORNEY OF RECORD /s/ Shireen Hormozdi

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 there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- 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.

# ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Alltran Financial's Misplaced Robocalls Allegedly Violate Two Federal Laws](#)

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