

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**
CASE NO. 9:17-CV-80830

ROBIN STETSON
Individually and on behalf of
all other similarly situated,
Plaintiff(s), CLASS REPRESENTATION

vs.
VANCE & HUFFMAN, LLC,
Defendant.

PLAINTIFF'S COMPLAINT

COMES NOW the Plaintiff, ROBIN STETSON (hereinafter referred to as the "Plaintiff" or "STETSON"), by and through her undersigned attorney, individually and on behalf of all others similarly situated, files this Complaint and sues the Defendant, VANCE & HUFFMAN, LLC, a FOREIGN LIMITED LIABILITY COMPANY, (hereinafter referred to as the "Defendant" or "V&H"), for damages and temporary and permanent injunctive relief and other relief pursuant to the Federal Fair Debt Collection Practices Act (hereinafter "FDCPA") and in support thereof alleges:

ALLEGATIONS COMMON TO ALL COUNTS

1. The Court has original jurisdiction in this action by virtue of 28 U.S.C. §1331 because the matter in dispute involves a federal law arising under the Constitution, laws, or treaties of the United States, to wit: the FDCPA, 15 U.S.C. §1692. The Court has supplemental jurisdiction over the state law claims pursuant to 28 U.S.C. §1367(a), as the other claims are so related to claims in the action within such original jurisdiction that they form part of the same case or controversy under Article III of the United States Constitution.
2. Venue is proper in this District under 28 U.S.C. §1391(b) because the allegations herein relate to Defendants' transactions in this District, and its infliction of injury on Plaintiff in the State of Florida. This is the judicial district in which all of the Defendants reside and all Defendants are residents of the State in which the district is located and this is the judicial district in which a substantial part of the events or omissions giving rise to the

claim occurred, or a substantial part of property that is the subject of the action is situated.

3. This is an action for damages and other relief for violation of the FDCPA 15 U.S.C. §1692, et seq.
4. At all times material hereto, the Plaintiff is a resident of this district in Palm Beach County, Florida, and is sui juris.
3. At all times material hereto, the Plaintiff is a consumer pursuant to the FDCPA in that she is a natural person obligated or allegedly obligated to pay a consumer debt.
4. At all times material hereto, the Defendant is a debt collector within the meaning of the FDCPA in that: the Defendant has used instrumentalities of interstate commerce such as the telephone, the mails, and the internet in their business the principal purpose of which is the collection of debts; the Defendant regularly collects or attempts to collect, directly or indirectly, debts owed or due or asserted to be owed or due another; and, the Defendant has represented themselves to be a debt collector.
5. At all times material hereto, the debt the Defendant was attempting to collect was an obligation or alleged obligation of the Plaintiff to pay money arising out of a transaction in which the money, property, insurance, or services which are the subject of the transaction are primarily for personal, family, or household purposes, whether or not such obligation had been reduced to judgment within the meaning of the FDCPA 15 U.S.C. § 1692a(5), to wit: a promissory note/loan for a consumer vehicle purchase.
6. The alleged debt the Defendant attempted to collect from the Plaintiff is due to, owed to, and owned by, another: HSBC. The debt is not due to, owed to, or owned by, the Defendant.
7. The alleged debt the Defendant attempted to collect from the Plaintiff was in default at the time the Defendants received the debt from the original creditor for purposes of collecting the debt.

8. The Defendant used interstate telephone services and facilities in their attempt to collect the alleged debt from the Plaintiff by making at least two phone calls to the Plaintiff for the purpose of collection to the State of Florida from the State of Virginia.

9. Defendant V&H:

- a. The Defendant regularly collects or attempts to collect, directly or indirectly, many consumer debts against many consumers, including the Plaintiff, that were due another.
- b. The Defendant uses scripts in their telephone calls and voicemail messages to consumers in their efforts to collect debts.
- c. The consumer debts the Defendant was attempting to collect were in default at the time the Defendant received the debts and attempted to collect said debts.
- d. The Defendant regularly uses the interstate telephone system to collect debts from consumer debtors on many occasions.
- e. The Defendant advertises that they specializing in debt sales, contingency collections, debt recovery, debt consolidation, paper purchasing, and portfolio management. They describe themselves as an elite financial services company specializing in debt recovery and debt management and that they work diligently and use all available means to liquidate consumer debts.
- f. Based upon the Defendant's own representations as being debt collectors, it is also believed they collect debts against dozens if not hundreds of other consumer debtors on a regular basis and use the telephone and US Mail in that business.
- g. The Defendant has officers, directors, employees, and/or other persons trained in debt collection practices and procedures on the staff of their business and they use forms and scripts specifically for debt collection in their debt collection activities.
- h. The instances of consumer debt collection activity performed by the Defendant is numerous, frequent, orderly, recurring, uniform, and performed at normal

intervals as routinely requested by clients pursuant to established client relationships to a sufficient degree to qualify as “regular” pursuant to the FDCPA.

10. All of the purported misrepresentations by the Defendant as stated herein are substantial and material and have resulted in direct harm to the Plaintiff.
11. The Plaintiff has retained the undersigned law firm to represent her in these proceedings pursuant to a fee agreement.
12. Pursuant to the FDCPA, 15 U.S.C. §1692(k)(3), if the Plaintiff is successful in enforcing liability under the Act, the Plaintiff is entitled to and requests that the Court award her reasonable attorney’s fees and costs incurred.
13. All conditions precedent to the filing of this action have occurred, have been satisfied, or have been waived.
14. The Plaintiff requests trial by jury on all issues triable by jury as of right or by law.

CLASS ACTION ALLEGATIONS

15. Plaintiff brings this case as a class action pursuant to Rule 23, Fed.R.Civ.P.
16. There are questions of law and fact common to each class, which common issues predominate over any issues peculiar to individual class members. The principal common questions include:
 - a. Whether V&H used false, deceptive, or misleading representations or means in connection with the collection of debts when V&H:
 1. Attempted to collect a debt through telephone calls and left voice messages without identifying themselves as debt collectors or that the purpose of the call was to collect a debt and any information obtained would be used for that purpose.
 2. Failed to provide the validation notice with all required information to consumers within 5 days after the initial communication with the consumers.

3. Created a false sense of urgency and were deceptive when the V&H representative did not identify themselves as debt collectors and left voicemail messages for consumers which stated that the call was **“in regards to paperwork pending review in my office”** and that **“it is imperative that you return my call today”**.
- b. Whether V&H used unfair or unconscionable means to collect or attempt to collect a debt when V&H:
1. Attempted to collect a debt through telephone calls and left voice messages without identifying themselves as debt collectors or that the purpose of the call was to collect a debt and any information obtained would be used for that purpose.
 2. Failed to provide the validation notice with all required information to consumers within 5 days after the initial communication with the consumers.
 3. Created a false sense of urgency and were deceptive when the V&H representative did not identify themselves as debt collectors and left voicemail messages for consumers which stated that the call was **“in regards to paperwork pending review in my office”** and that **“it is imperative that you return my call today”**.
- c. Whether V&H violated 15 USC 1692e(11) when they failed to disclose that the communication was from a debt collector and that the debt collector is attempting to collect a debt and that any information obtained will be used for that purpose.
17. (i) Approximate Number of Class Members: The members of the class are so numerous that separate joinder of each member is impracticable. The approximate number of class members is unknown but is reasonably expected to be in the hundreds if not thousands.
18. (ii) Definition of the Alleged Class: This are two (2) classes and they are defined as follows:

- a. The First Class (the “FAILURE TO IDENTIFY CLASS”) consists of all persons who satisfy the following criteria.
 - (i) Florida residents;
 - (ii) Who received a debt collection telephone call from V&H wherein the caller from V&H left a message for the consumer.
 - (iii) In the message, V&H did not identify themselves as debt collectors or that the purpose of the call was the collection of a debt and that any information would be used for that purpose in the message.
 - (iv) During the one year period prior to the filing of the complaint in this action.

 - b. The Second Class (the “VERIFICATION CLASS”) consists of all persons who satisfy the following criteria.
 - (v) Florida residents;
 - (vi) Who did not receive their debt validation notice in writing within 5 days from the initial communication with V&H.
 - (vii) During the one year period prior to the filing of the complaint in this action.
18. (iii) The Representative Party Will Fairly and Adequately Protect and Represent the Interests of Each Member of the Class: The Plaintiff will fairly and adequately represent the interests of the class members.
19. The Plaintiff has retained counsel experienced in prosecuting consumer protection matters and there is no reason why Plaintiff and her counsel will not vigorously pursue this matter.
20. (b)(1)(A) The prosecution of separate claims or defenses by or against individual members of the class would create a risk of inconsistent or varying adjudications concerning individual members of the class which would establish incompatible standards of conduct for the party opposing the class.
21. (b)(1)(B) Adjudications concerning individual members of the class which would, as a practical matter, be dispositive of the interests of other members of the class who are not parties to the adjudications, or substantially impair or impede the ability of other

members of the class who are not parties to the adjudications to protect their interests.

22. (b)(2) The Defendant has acted or refused to act on grounds generally applicable to all the members of the class, thereby making final injunctive relief or an award of damages concerning the class as a whole appropriate. Plaintiff's claims are typical of the claims of all of the members of all Classes who were the subject of improper debt collection activities and communications from the Defendant in violation of the law. The Defendant has acted on grounds which are generally applicable to the Classes, in that they have acted in a uniform manner with respect to all members of the Classes. The Plaintiff and the members of the Classes have sustained similar damages and violations of their rights as a result of the actions of the Defendant and are requesting similar relief.
23. (b)(3) The questions of law or fact common to the claims of the representative party and the claims of each member of the class predominate over any question of law or fact affecting only individual members of the Classes, and class representation is superior to other available methods for the fair and efficient adjudication of the controversy. The principal common questions include:
1. Whether V&H used false, deceptive, or misleading representations or means in connection with the collection of debts and/or whether V&H used unfair or unconscionable means to collect or attempt to collect a debt when V&H called consumers and left voicemail messages for the consumer without identifying themselves as debt collectors or that the purpose of the call was to collect a debt and any information obtained would be used for that purpose.
 2. Whether V&H failed to provide the validation notice with all required information to consumers within 5 days after the initial communication with the consumers.
 3. Whether V&H created a false sense of urgency and were deceptive when the V&H representative did not identify themselves as debt collectors and left voicemail messages for consumers which stated that the call was **“in regards to paperwork pending review in my office”** and that **“it is imperative that you return my call today”**, when those statements were not true.

COUNT I VIOLATION OF THE FDCPA 15 USC §1692e and f

24. Plaintiff readopts and realleges allegations 1 through 23, inclusive, as if fully set forth herein.
25. In addition to all other counts of this complaint or in the alternative to them, the Plaintiff, individually and on behalf of all others similarly situated, sues Defendant V&H for violation of FDCPA 15 USC §1692 e and f, et seq.
26. At all times material hereto, Defendant V&H acted to collect consumer debts, including consumer debts from consumer vehicle loans and purchases in Florida.
27. On or about 6/20/2017 and 6/21/2017, a representative of V&H called the Plaintiff and left voicemail messages for the Plaintiff for the purposes of collecting a debt from the Plaintiff. Said voicemail messages for the consumer did not identify the caller as a debt collector or that the purpose of the call was to collect a debt and any information obtained would be used for that purpose.
28. The voicemail messages from V&H said it was **“in regards to paperwork pending review in my office”** and that **“it is imperative that you return my call today”**, which statements were not true.
29. Due to the nature of the message and not knowing it was from a debt collector, Plaintiff returned the call in earnest on 6/21/2017. The Plaintiff would have never have returned the call had she known it was from a debt collector.
30. Despite requesting verification of the debt in writing, neither the Plaintiff nor the Plaintiff’s counsel have ever received proper debt validation/verification information from V&H.
31. Said debt collection communications from V&H concerned a promissory note on a consumer vehicle purchase.
32. These actions of V&H were a direct violation of the following provisions of the FDCPA:
 - a. V&H’s collection activity violated 15 U.S.C. §1692e, in that V&H used false,

deceptive, or misleading representation or means in connection with the collection of the debt.

- b. V&H's collection activity violated 15 U.S.C. §1692e(10), in that V&H used false representations or deceptive means to collect or attempt to collect any debt or to obtain information concerning a consumer.
- c. Whether V&H violated 15 USC 1692e(11) when they failed to disclose that the communication was from a debt collector and that the debt collector is attempting to collect a debt and that any information obtained will be used for that purpose.
- d. V&H's collection activity violated 15 U.S.C. §1692f, in that V&H used unfair or unconscionable means to collect or attempt to collect this debt.
- e. V&H's collection activity violated 15 U.S.C. §1692g, in that V&H did not identify themselves as debt collectors or that the purpose of the call was to collect a debt and any information obtained would be used for that purpose.
- f. V&H's collection activity violated 15 U.S.C. §1692g, in that V&H did not provide the validation notice within 5 days after their initial communication with the Debtor on 6/21/2017. V&H did not provide the following statements to the Plaintiff or the Plaintiff's representative:
 1. (3) a statement that unless the consumer, within thirty days after receipt of the notice, disputes the validity of the debt, or any portion thereof, the debt will be assumed to be valid by the debt collector;
 2. (4) a statement that if the consumer notifies the debt collector in writing within the thirty-day period that the debt, or any portion thereof, is disputed, the debt collector will obtain verification of the debt or a copy of a judgment against the consumer and a copy of such verification or judgment will be mailed to the consumer by the debt collector; and
 3. (5) a statement that, upon the consumer's written request within the thirty-day

period, the debt collector will provide the consumer with the name and address of the original creditor, if different from the current creditor.

33. The Plaintiff and the members of both Classes have suffered damages by virtue of the violations of the law by Defendant V&H and will continue to suffer those damages until the Court takes affirmative action against V&H to halt said violations.

WHEREFORE, The Plaintiff and the members of both Classes, demand trial by jury and judgment against the Defendant V&H for:

1. Statutory damages pursuant to 15 U.S.C. §1692k.
2. Such additional damages as the court may allow for each plaintiff/class member up to \$1,000.00 pursuant to 15 U.S.C. § 1692k.
3. The amount the court may allow for all other class members, without regard to a minimum individual recovery, not to exceed the lesser of \$500,000 or 1 per centum of the net worth of the debt collector pursuant to 15 U.S.C. § 1692k.
4. Temporary and permanent injunctive relief prohibiting further such violations of the law.
5. Attorney's fees and costs pursuant to 15 U.S.C. § 1692k.
6. Such other and further relief in the premises that the Court deems appropriate.

DEMAND FOR JURY TRIAL

Plaintiff demands trial by jury on all matters triable by jury as a matter of right or law.

/s/ ***John J.R. Skrandel***, FL Bar #120413
Jerome F. Skrandel, PL
Counsel for Plaintiff ROBIN STETSON
300 Prosperity Farms Road, Suite D
North Palm Beach, FL 33408-5212
Phone (561)863-1605 Fax (561)863-1606
Email JFSPA@MSN.COM

7/11/2017

/s/ ***John J.R. Skrandel***
FL Bar #120413

JS 44 (Rev. 2/08)

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 THE REVERSE OF THE FORM.) **NOTICE: Attorneys MUST Indicate All Re-filed Cases Below.**

I. (a) PLAINTIFFS

ROBIN STETSON

(b) County of Residence of First Listed Plaintiff PALM BEACH
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

JOHN J.R. SKRANDEL
JEROME F. SKRANDEL, PL
300 PROSPERITY FARMS ROAD, SUITE D
NORTH PALM BEACH FL 33408

DEFENDANTS

VANCE AND HUFFMAN, LLC

County of Residence of First Listed Defendant FOREIGN-VIRGINIA
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT LAND INVOLVED.

Attorneys (If Known)

(d) Check County Where Action Arose: MIAMI-DADE MONROE BROWARD PALM BEACH MARTIN ST. LUCIE INDIAN RIVER OKEECHOBEE HIGHLANDS

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)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

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

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input checked="" type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS	FEDERAL TAX SUITS	
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	

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

- 1 Original Proceeding 2 Removed from State Court 3 Re-filed- (see VI below) 4 Reinstated or Reopened 5 Transferred from another district (specify) 6 Multidistrict Litigation 7 Appeal to District Judge from Magistrate Judgment

VI. RELATED/RE-FILED CASE(S).

(See instructions second page):
a) Re-filed Case YES NO
b) Related Cases YES NO
JUDGE Not assigned yet DOCKET NUMBER

VII. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing and Write a Brief Statement of Cause (Do not cite jurisdictional statutes unless diversity):
15 USC 1692 Claims for violation of provisions of Fair Debt Collection Practices Act
LENGTH OF TRIAL via 2 days estimated (for both sides to try entire case)

VIII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 DEMAND \$ 1,000.00
CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

ABOVE INFORMATION IS TRUE & CORRECT TO THE BEST OF MY KNOWLEDGE

SIGNATURE OF ATTORNEY OF RECORD

John J.R. Skrandel

DATE

July 11, 2017

FOR OFFICE USE ONLY

AMOUNT

RECEIPT #

IFP

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 9:17-CV-80830

ROBIN STETSON
Individually and on behalf of
all other similarly situated,
Plaintiff(s), CLASS REPRESENTATION

vs.
VANCE & HUFFMAN, LLC,
Defendant.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*
Vance & Huffman, LLC
Registered Agent for Service
REGISTERED AGENT SOLUTIONS, INC.
155 OFFICE PLAZA DRIVE
TALLAHASSEE, FL 32301

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

John J.R. Skrandel, FL Bar #120413
Jerome F. Skrandel, PL
Counsel for Plaintiff(s)
300 Prosperity Farms Road, Suite D
North Palm Beach, FL 33408-5212
Phone (561)863-1605 Fax (561)863-1606
Email JFSPA@MSN.COM

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Vance & Huffman Named in Lawsuit Over Debt Collection Methods](#)
