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6 Attorneys for Defendant
Experian Information Solutions, Inc.
7

8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA
10

11 JOHN WILSON and NIEYSHA
12 WHITE, Individually and On Behalf of
All Others Similarly Situated,

13 Plaintiff,

14 v.

15 EXPERIAN INFORMATION
16 SOLUTIONS, INC.,

17 Defendants.
18

Case No. **'18CV1249 BEN BGS**

[Removal of San Diego County
Superior Court, Case No.
37-2018-00019869-CU-NP-CTL]

**EXPERIAN INFORMATION
SOLUTIONS, INC.'S NOTICE OF
REMOVAL**

Complaint Filed: April 20, 2018

19 Pursuant to 28 U.S.C. § 1441 *et seq.*, Defendant Experian Information
20 Solutions, Inc. (“Experian”) hereby files this Notice of Removal of the above-
21 captioned action to this Court and states as follows:

22 1. Experian is a named Defendant in Civil Action No. 37-2018-00019869-
23 CU-NP-CTL filed by Plaintiffs John Wilson and Nieysha White (“Plaintiffs”) in the
24 Superior Court of the State of California, County of San Diego, Central Division,
25 Complex (the “State Court Action”).

26 2. The Complaint in the State Court Action was filed with the Clerk of the
27 Superior Court of California, County of San Diego, Central Division, Complex on
28 April 20, 2018.

1 3. Plaintiffs served Experian with the Complaint on May 14, 2018. This
2 Notice is being filed with this Court within thirty (30) days after Experian received a
3 copy of Plaintiffs’ initial pleading setting forth the claims for relief upon which
4 Plaintiffs’ action is based.

5 4. This Court is the proper district court for removal because the State
6 Court Action is pending within this district.

7 5. Pursuant to 28 U.S.C. § 1446(a), copies of all process, pleadings, and
8 orders served upon Experian or filed in the State Court Action are attached hereto as
9 **Exhibits A-D.**

10 6. Experian is a corporation that, for monetary fees, regularly engages in
11 whole or in part in the practice of assembling consumer credit information or other
12 information on consumers for the purpose of furnishing consumer reports to third
13 parties. Experian uses means or facilities of interstate commerce for the purpose of
14 preparing or furnishing consumer reports, and therefore is a “consumer reporting
15 agency” within the meaning of 15 U.S.C. § 1681a(f).

16 7. The claims for relief against Experian alleged in the State Court Action
17 arise under the Fair Credit Reporting Act, 15 U.S.C. §§ 1681 *et seq.* Thus, this Court
18 has original subject matter jurisdiction over the above-captioned action pursuant to
19 28 U.S.C. § 1331 and 15 U.S.C. § 1681p. The above-captioned action may properly
20 be removed to this United States District Court pursuant to 28 U.S.C. § 1441(a).

21 8. Promptly after the filing of this Notice of Removal, Experian shall
22 provide notice of the removal to Plaintiffs through their attorneys of record in the
23 State Court Action, and shall file a copy of this Notice with the Clerk of the Court in
24 the State Court Action, as required by 28 U.S.C. § 1446(d).

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Dated: June 12, 2018

Respectfully submitted,

JONES DAY

By: /s/ John A. Vogt
John A. Vogt

Attorneys for Defendant
EXPERIAN INFORMATION
SOLUTIONS, INC.

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28**List of State Court Documents**

Ex.	Filing Date	Document	Page(s)
A	4/20/18	Civil Case Cover Sheet	5 - 7
B	4/20/18	Complaint	8 - 17
C	4/23/18	Summons on Complaint	18 - 19
D	4/23/18	Notice of Case Assignment and Case Management Conference on Mandatory eFile Case	20 - 21

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

John Wilson and Nieysa White, individually and On Behalf of All 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) Kazerouni Law Group, APC Tel: (800) 400-6808 245 Fischer Avenue, Unit D Fax: (800) 520-5523 Costa Mesa, CA 92626

DEFENDANTS

Experian Information Solutions, Inc.

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) Jones Day 3161 Michelson Drive, Suite 800 Irvine, CA 92612

'18CV1249 BEN BGS

Tel: (949) 851-3939 Fax: (949) 553-7539

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, CIVIL RIGHTS, TORTS, PRISONER PETITIONS, LABOR, IMMIGRATION, FORFEITURE/PENALTY, SOCIAL SECURITY, FEDERAL TAX SUITS, BANKRUPTCY, 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 - 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): 15 U.S.C. 1681 et seq. (FCRA) Brief description of cause: Alleged violations of Fair Credit Reporting Act, 15 U.S.C. 1681 et seq.

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 Anthony J. Battaglia DOCKET NUMBER 3:17-cv-01741

DATE 06/12/2017 SIGNATURE OF ATTORNEY OF RECORD /s/ John A. Vogt

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.

Exhibit A

CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Abbas Kazerounian, Esq. (SBN 249203) KAZEROUNI LAW GROUP, APC 245 Fisher Avenue, Unit D1, Costa Mesa, CA 92626 TELEPHONE NO: (800) 400-6808 FAX NO: (800) 520-5523 ATTORNEY FOR (Name): Plaintiffs, John Wilson & Nieysha White	FOR COURT USE ONLY ELECTRONICALLY FILED Superior Court of California, County of San Diego 04/20/2018 at 03:09:07 PM Clerk of the Superior Court By Georgia Dixon-Cosby, Deputy Clerk
SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Diego STREET ADDRESS: 330 W. Broadway MAILING ADDRESS: 330 W. Broadway CITY AND ZIP CODE: San Diego, 92101 BRANCH NAME: Hall of Justice	CASE NUMBER: 37-2018-00019869-CU-NP-CTL JUDGE: Judge Timothy Taylor DEPT:
CASE NAME: John Wilson, et al. v. Experian Information Solutions, Inc.	CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) <input type="checkbox"/> Limited (Amount demanded is \$25,000 or less) Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

Items 1-6 below must be completed (see instructions on page 2).

1. Check **one** box below for the case type that best describes this case:

Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/PD/WD (23) Non-PI/PD/WD (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input checked="" type="checkbox"/> Other non-PI/PD/WD tort (35) Employment <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) Real Property <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
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2. This case is is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- | | |
|---|--|
| a. <input type="checkbox"/> Large number of separately represented parties | d. <input type="checkbox"/> Large number of witnesses |
| b. <input checked="" type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input checked="" type="checkbox"/> Substantial amount of documentary evidence | f. <input checked="" type="checkbox"/> Substantial postjudgment judicial supervision |
3. Remedies sought (check all that apply): a. monetary b. nonmonetary; declaratory or injunctive relief c. punitive
4. Number of causes of action (specify): (1) Fair Credit Reporting Act, 15 U.S.C. §§ 1681, et seq.
5. This case is is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: April 20, 2018
 Abbas Kazerounian, Esq.

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you **must** complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check **one** box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the **primary** cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

CASE TYPES AND EXAMPLES

Auto Tort

Auto (22)–Personal Injury/Property Damage/Wrongful Death
Uninsured Motorist (46) (*if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto*)

Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

Asbestos (04)
Asbestos Property Damage
Asbestos Personal Injury/Wrongful Death
Product Liability (*not asbestos or toxic/environmental*) (24)
Medical Malpractice (45)
Medical Malpractice–Physicians & Surgeons
Other Professional Health Care Malpractice
Other PI/PD/WD (23)
Premises Liability (e.g., slip and fall)
Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)
Intentional Infliction of Emotional Distress
Negligent Infliction of Emotional Distress
Other PI/PD/WD

Non-PI/PD/WD (Other) Tort

Business Tort/Unfair Business Practice (07)
Civil Rights (e.g., discrimination, false arrest) (*not civil harassment*) (08)
Defamation (e.g., slander, libel) (13)
Fraud (16)
Intellectual Property (19)
Professional Negligence (25)
Legal Malpractice
Other Professional Malpractice (*not medical or legal*)
Other Non-PI/PD/WD Tort (35)

Employment

Wrongful Termination (36)
Other Employment (15)

Contract

Breach of Contract/Warranty (06)
Breach of Rental/Lease Contract (*not unlawful detainer or wrongful eviction*)
Contract/Warranty Breach–Seller Plaintiff (*not fraud or negligence*)
Negligent Breach of Contract/Warranty
Other Breach of Contract/Warranty
Collections (e.g., money owed, open book accounts) (09)
Collection Case–Seller Plaintiff
Other Promissory Note/Collections Case
Insurance Coverage (*not provisionally complex*) (18)
Auto Subrogation
Other Coverage
Other Contract (37)
Contractual Fraud
Other Contract Dispute

Real Property

Eminent Domain/Inverse Condemnation (14)
Wrongful Eviction (33)
Other Real Property (e.g., quiet title) (26)
Writ of Possession of Real Property
Mortgage Foreclosure
Quiet Title
Other Real Property (*not eminent domain, landlord/tenant, or foreclosure*)

Unlawful Detainer

Commercial (31)
Residential (32)
Drugs (38) (*if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential*)

Judicial Review

Asset Forfeiture (05)
Petition Re: Arbitration Award (11)
Writ of Mandate (02)
Writ–Administrative Mandamus
Writ–Mandamus on Limited Court Case Matter
Writ–Other Limited Court Case Review
Other Judicial Review (39)
Review of Health Officer Order
Notice of Appeal–Labor
Commissioner Appeals

Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)

Antitrust/Trade Regulation (03)
Construction Defect (10)
Claims Involving Mass Tort (40)
Securities Litigation (28)
Environmental/Toxic Tort (30)
Insurance Coverage Claims (*arising from provisionally complex case type listed above*) (41)

Enforcement of Judgment

Enforcement of Judgment (20)
Abstract of Judgment (Out of County)
Confession of Judgment (*non-domestic relations*)
Sister State Judgment
Administrative Agency Award (*not unpaid taxes*)
Petition/Certification of Entry of Judgment on Unpaid Taxes
Other Enforcement of Judgment Case

Miscellaneous Civil Complaint

RICO (27)
Other Complaint (*not specified above*) (42)
Declaratory Relief Only
Injunctive Relief Only (*non-harassment*)
Mechanics Lien
Other Commercial Complaint Case (*non-tort/non-complex*)
Other Civil Complaint (*non-tort/non-complex*)

Miscellaneous Civil Petition

Partnership and Corporate Governance (21)
Other Petition (*not specified above*) (43)
Civil Harassment
Workplace Violence
Elder/Dependent Adult Abuse
Election Contest
Petition for Name Change
Petition for Relief From Late Claim
Other Civil Petition

Exhibit B

ELECTRONICALLY FILED
Superior Court of California,
County of San Diego
04/20/2018 at 03:09:07 PM
Clerk of the Superior Court
By Georgia Dixon-Cosby, Deputy Clerk

1 **KAZEROUNI LAW GROUP, APC**
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11 **LAW OFFICE OF DANIEL G. SHAY**
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13 San Diego, CA 92108
Telephone: (619) 222-7249
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15 *Attorneys for Plaintiffs,*
John Wilson and Nieysha White
16

17 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

18 **FOR THE COUNTY OF SAN DIEGO – CENTRAL DIVISION – COMPLEX**

19 **JOHN WILSON and NIEYSHA WHITE,**
Individually and On Behalf of All Others
20 **Similarly Situated,**

21 **Plaintiffs,**

22 **v.**

23 **EXPERIAN INFORMATION SOLUTIONS,**
24 **INC.**

25 **Defendant.**

Case No.: 37-2018-00019869-CU-NP-CTL

CLASS ACTION

**COMPLAINT OR DAMAGES PURSUANT
TO THE FAR CREDIT REPORTING ACT,
15 U.S.C. §§ 1681, ET SEQ.**

JURY TRIAL DEMANDED

[COMPLEX CIVIL UNLIMITED]

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

CLASS ACTION COMPLAINT

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

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INTRODUCTION

1. Plaintiffs JOHN WILSON and NIEYSHA WHITE (collectively as “Plaintiffs”) bring this Class Action Complaint for damages and any other available legal or equitable remedies, resulting from the illegal actions of Defendant EXPERIAN INFORMATION SOLUTIONS, INC. (“Defendant” or “Experian”), in negligently and willfully inaccurately reporting the location of the courthouse in which Plaintiffs filed for bankruptcy in violation of the federal Fair Credit Reporting Act, 15 U.S.C. §§ 1681, et seq. (“FCRA”).
2. Plaintiffs allege as follow upon personal knowledge as to themselves and their own acts and experiences, and, as to all other matters, upon information and belief, including investigation conducted by their attorneys.
3. In enacting the FCRA, Congress indicated that the banking system is dependent upon fair and accurate credit reporting. Inaccurate credit reports directly impair the efficiency of the banking system, and unfair credit reporting methods undermine the public confidence which is essential to the continued functioning of the banking system. 15 U.S.C. § 1681(a)(1).
4. Consumer reporting agencies have assumed a vital role in assembling and evaluating consumer credit and other information on consumers as there is a need to insure that consumer reporting agencies exercise their grave responsibilities with fairness, impartiality, and a respect for the consumer’s right to privacy under 15 U.S.C. § 1681(a)(3) & (a)(4).
5. Accordingly, consumer reporting agencies are required to adopt reasonable procedures for meeting the needs of commerce for consumer credit, personnel, insurance, and other information in a manner which is fair and equitable to the consumer, with regard to the confidentiality, accuracy, relevancy, and proper utilization of such information in accordance with the requirements of this title. 15 U.S.C. § 1681(b). In other words, the FCRA is designed to protect the privacy of consumer report information, sometimes informally called “credit reports”, and to guarantee that information supplied by consumer reporting agencies is as accurate as possible.
6. Although many violations are described below with specificity, this Class Action Complaint alleges violations of the statute in its entirety.

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

- 1 7. Unless otherwise stated, Plaintiffs allege that any violation by Defendant were negligent and
- 2 willful and that Defendant did not maintain procedures reasonably adapted to avoid any such
- 3 violation.
- 4 8. Plaintiffs bring this case as a class action seeking damages for themselves and all other
- 5 individuals similarly situated.

JURISDICTION & VENUE

- 7 9. This action arises out of Defendant’s violations of the Fair Credit Reporting Act, 15 U.S.C. §§
- 8 1681, et seq. (“FCRA”). State and Federal Court have concurrent jurisdiction over FCRA
- 9 cases under 15 U.S.C. § 1681p.
- 10 10. Venue is proper in this Court because the events leading up to Plaintiffs’ Class Action
- 11 Complaint occurred in the County of San Diego and the State of California.
- 12 11. At all times relevant herein, Plaintiffs have resided in the County of San Diego, and Defendant
- 13 does business within the County of San Diego.
- 14 12. Upon information and belief, Defendant regularly and continuously conducts business within
- 15 the County of San Diego, thus, personal jurisdiction is established.

PARTIES & DEFINITIONS

- 17 13. Plaintiffs are, at all times mentioned herein, were natural persons residing in the County of San
- 18 Diego and the State of California.
- 19 14. Plaintiffs are, and at all times mentioned herein, were “consumers” as defined by 15 U.S.C. §
- 20 1681a(c).
- 21 15. Defendant is, and at all times mentioned herein was, a corporation incorporated in the State of
- 22 Ohio with its principal place of business located in California and is a “person” as defined by
- 23 15 U.S.C. § 1681a(b).
- 24 16. At all times relevant herein, Defendant conducted business in the County of San Diego.
- 25 17. This action pertains to Plaintiffs’ “consumer reports”, as defined by 15 U.S.C. § 1681a(d)(1),
- 26 in that inaccurate information regarding the location in which Plaintiffs filed for bankruptcy
- 27 were made via written, oral, or other communication by Defendant.

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1 18. A “consumer report” contains information by a consumer reporting agency bearing on a
2 consumer’s credit worthiness, credit standing, credit capacity, character, general reputation,
3 personal characteristics, or mode of living which is used or expected to be used or collected in
4 whole or in part for the purpose of serving as a factor in establishing the consumer’s eligibility
5 for, among other things, credit to be used primarily for personal, family, or household
6 purposes, and employment purposes.

7 **FACTUAL ALLEGATIONS**

8 19. Experian is a “consumer reporting agency” which publishes information bearing on a
9 consumer’s credit worthiness, credit standing, credit capacity, character, general reputation,
10 personal characteristics, or mode of living which is used or expected to be used or collected in
11 whole or in part for the purpose of serving as a factor in establishing the consumer’s eligibility
12 for, among other things, credit to be used primarily for personal, family, or household
13 purposes, and employment purposes.

14 20. As a “consumer reporting agency,” Defendant was required to follow reasonable procedures to
15 assure maximum possible accuracy of the information concerning the individual about whom
16 the report related, pursuant to 15 U.S.C. § 1681e(b).

17 21. Plaintiffs’ consumer report contained inaccurate information.

18 22. On January 28, 2016, Plaintiff John Wilson filed bankruptcy in the United States Bankruptcy
19 Court, Southern District of California located at 325 West F Street, San Diego, CA 92101.

20 23. Sometime thereafter, or about November 22, 2016, John Wilson requested and obtained a
21 copy of his consumer report from Experian. Upon close inspection, John Wilson realized that
22 Experian had reported the location of his bankruptcy information as “940 FRONT ST RM
23 5N26, SAN DIEGO CA 92101”, rather than the true address above.

24 24. On April 24, 2017, Plaintiff Nieysa White filed bankruptcy in the United States Bankruptcy
25 Court, Southern District of California located at 325 West F Street, San Diego, CA 92101.

26 25. Sometime thereafter, or about September 28, 2017, Nieysa White requested and obtained a
27 copy of her consumer report from Experian. Upon close inspection, Nieysa White realized
28

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1 that Experian had reported the location of her bankruptcy information as “940 FRONT ST RM
2 5N26, SAN DIEGO CA 92101”, rather than the true address as indicated above.

3 26. As a consumer reporting agency, Experian had a duty and obligation to report true and
4 accurate information regarding public records.

5 27. Plaintiffs believe that the inaccuracy was due to Defendant’s unreasonable procedures.

6 28. As a result of Defendant’s inaccuracy, Plaintiffs suffered injury and such injury was caused by
7 Defendant’s inclusion of the inaccurate entry.

8 **CLASS ACTION ALLEGATIONS**

9 29. Plaintiffs bring this action on behalf of themselves and on behalf of all others similarly
10 situated (the “Class”).

11 30. Plaintiffs each represent, and are members of the Class, consisting of:

All persons who filed bankruptcy in the United States Bankruptcy Court,
Southern District of California, within the last 10 years, for whom
Experian Information Solutions, Inc. inaccurately reported the address of
the bankruptcy court, within five years preceding the filing of this action
through the date of an Order granting Class certification or preliminary
approval of Class Action Settlement.

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16 31. Defendant and its employees or agents are excluded from the Class. Plaintiffs do not know the
17 number of members in the Class, but believe the Class members number in the thousands, if
18 not more. Thus, this matter should be certified as a Class action to assist in the expeditious
19 litigation of this matter.

20 32. Plaintiffs and members of the Class were harmed by the acts of Defendant in at least the
21 following ways: (i) Defendant prepares and delivers thousands of consumer reports to
22 consumers who have filed bankruptcy in the United States Bankruptcy Court, Southern
23 District of California; and (ii) Defendant’s uniform practice and procedure is to always publish
24 the incorrect address of said courthouse. Plaintiffs and the Class members were damaged
25 thereby.

26 33. This suit seeks only damages for recovery of economic injury on behalf of the Class, and it
27 expressly is not intended to request any recovery for personal injury and claims related thereto.
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1 Plaintiffs reserve the right to expand the Class definition to seek recovery on behalf of
2 additional persons as warranted as facts are learned in further investigation and discovery.

3 34. **Numerosity**. The joinder of the Class members is impractical and the disposition of their
4 claims in the Class action will provide substantial benefits both to the parties and to the Court.
5 The Class can be identified through Defendant’s records or Defendant’s agents’ records.

6 35. **Existence and Predominance of Common Questions of Law and Fact**. There is a well-
7 defined community of interest in the questions of law and fact involved affecting the parties to
8 be represented. The questions of law and fact to the Class predominate over questions which
9 may affect individual Class members, including the following:

- 10 a) Whether, within the five years prior to the filing of this Complaint, Defendant
11 inaccurately reported the address of Plaintiffs and members of the Class bankruptcy
12 court;
- 13 b) Whether the inaccuracy was due to the Defendant’s standard unreasonable
14 procedures;
- 15 c) Whether Plaintiffs and the Class members suffered injury as a result of the
16 inaccuracy;
- 17 d) Whether Plaintiffs and the Class members injuries were caused by the inclusion of
18 the inaccurate entry;
- 19 e) Whether Plaintiffs and the Class members were damaged thereby, and the extent of
20 damages for such violations;
- 21 f) Whether Defendant’s conduct was negligent and/or willful;
- 22 g) Whether Plaintiffs and the Class are entitled to punitive damages; and
- 23 h) Whether Plaintiffs and the Class are entitled to any other relief.

24 36. **Typicality**. As consumers that requested and received at least one consumer report from
25 Defendant which included false information regarding the location of the courthouse in which
26 Plaintiffs filed for bankruptcy, Plaintiffs are asserting claims that are typical of the Class.
27 Plaintiffs will fairly and adequately represent and protect the interests of the Class in that
28 Plaintiffs have no interests antagonistic to any member of the Class.

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1 37. Plaintiffs and the members of the Class have all suffered irreparable harm as a result of
2 Defendant’s unlawful and wrongful conduct. Absent a class action, the Class will continue to
3 face the potential for irreparable harm. In addition, the violations of law will be allowed to
4 proceed without remedy and Defendant will likely continue such illegal conduct. Because of
5 the size of the individual Class member’s claims, few, if any, Class members could afford to
6 seek legal redress for the wrongs complained of herein.

7 38. **Adequacy of Representation**. Plaintiffs will fairly and adequately represent and protect the
8 interests of other members of the Class in that Plaintiffs have no interests antagonistic to any
9 member of the Class. Further, Plaintiffs have retained counsel experienced in handling class
10 action claims and claims involving violations of the Fair Credit Reporting Act.

11 39. **Superiority**. A class action is a superior method for the fair and efficient adjudication of this
12 controversy. Class-wide damages are essential to induce Defendant to comply with the
13 FCRA. The interest of Class members in individually controlling the prosecution of separate
14 claims against Defendant is small because the maximum statutory damages in an individual
15 action for violation of the FRCA are minimal. Management of these claims is likely to
16 present significantly fewer difficulties than those presented in many class claims.

17 40. The conduct, action, and inaction of Defendant was willful, rendering the Defendant liable for
18 statutory and punitive damages in an amount to be determined by the Court. In the
19 alternative, Defendant acted negligently entitling Plaintiffs and the Class to actual damages
20 sustained by each consumer.

21 **FIRST CAUSE OF ACTION**
22 **NEGLIGENT VIOLATION OF THE FCRA**
23 **15 U.S.C. §§ 1681, ET SEQ. (FCRA)**

24 41. Plaintiffs incorporate by reference all of the above paragraphs of this Class Action Complaint
25 as though fully stated herein.

26 42. The foregoing acts and omissions constitute numerous and multiple violations of the FCRA,
27 including but not limited to each and every one of the above-cited provisions of 15 U.S.C.
28 §§ 1681, et seq.

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1 43. As a result of Defendant’s negligent violation of 15 U.S.C. §§ 1681, et seq., Plaintiffs and the
2 Class are entitled to actual damages, pursuant to 15 U.S.C. § 1681o(a)(1); and reasonable
3 attorneys’ fees and costs pursuant to 15 U.S.C. § 1681o(a)(2).

4 **SECOND CAUSE OF ACTION**
5 **WILLFUL VIOLATION OF THE FCRA**
6 **15 U.S.C. §§ 1681, ET SEQ. (FCRA)**

7 44. Plaintiffs incorporate by reference all of the above paragraphs of this Class Action Complaint
8 as though fully stated herein.

9 45. The foregoing acts and omissions of Defendant constitute numerous and multiple willful
10 violations of the FCRA, including but not limited to each and every one of the above-cited
11 provisions of 15 U.S.C. §§ 1681, et seq.

12 46. As a result of each and every willful violation of the FCRA, Plaintiffs and the Class are
13 entitled to actual damages of not less than \$100 and not more than \$1,000, pursuant to 15
14 U.S.C. § 1681n(a)(1)(A); punitive damages as the Court may allow, pursuant to 15 U.S.C.
15 §§ 1681n(a)(2); and reasonable attorneys’ fees and costs pursuant to 15 U.S.C. § 1681n(a)(3).

16 **PRAYER FOR RELIEF**

17 **WHEREFORE**, Plaintiffs respectfully request the Court to grant Plaintiffs and the Class
18 the following relief against Defendant:

- 19 • Certify the Class as requested herein;
- 20 • Appoint Plaintiffs to serve as the Class Representatives in this matter;
- 21 • Appoint Plaintiffs’ Counsel as Class Counsel in this matter;
- 22 • Any such further relief as may be just and proper.

23 In addition, Plaintiffs and the Class pray for further judgment as follows against Defendant:

24 **COUNT 1**
25 **NEGLIGENT VIOLATION OF THE FCRA**
26 **15 U.S.C. §§ 1681, ET SEQ.**

- 27 • As a result of Defendant’s negligent violations of 15 U.S.C. §§ 1681, et seq., Plaintiffs
28 seek for themselves and each Class member actual damages, pursuant to 15 U.S.C.
§ 1681o(a)(1);
- Reasonable attorneys’ fees and costs pursuant to 15 U.S.C. § 1681o(a)(2); and

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- Any other relief the Court may deem just and proper.

**COUNT 2
WILLFUL VIOLATION OF THE FCRA
15 U.S.C. §§ 1681, ET SEQ.**

- As a result of Defendant’s willful violations, Plaintiffs seek for themselves and each Class member actual damages of not less than \$100 and not more than \$1,000, pursuant to 15 U.S.C. § 1681n(a)(1)(A);
- Punitive damages as the Court may allow pursuant to 15 U.S.C. § 1681n(a)(2);
- The costs of the action together with reasonable attorneys’ fees as determined by the Court, pursuant to 15 U.S.C. §§ 1681n(a)(3); and
- Any other relief the Court may deem just and proper.


TRIAL BY JURY

47. Plaintiffs are entitled to, and demand, a trial by jury.

Dated: April 18, 2018

Respectfully submitted,

KAZEROUNI LAW GROUP, APC

By: 

 ABBAS KAZEROUNIAN, ESQ.
 AK@KAZLG.COM
 ATTORNEYS FOR PLAINTIFFS

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

Exhibit C

SUM-100

**SUMMONS
(CITACION JUDICIAL)**

**NOTICE TO DEFENDANT:
(AVISO AL DEMANDADO):**

Experian Information Solutions, Inc.

**YOU ARE BEING SUED BY PLAINTIFF:
(LO ESTÁ DEMANDANDO EL DEMANDANTE):**

John Wilson & Nieysa White

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

ELECTRONICALLY FILED
Superior Court of California,
County of San Diego

04/20/2018 at 03:09:07 PM

Clerk of the Superior Court
By Georgia Dixon-Cosby, Deputy Clerk

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **¡AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es):

San Diego Superior Court - Hall of Justice
330 W. Broadway, San Diego, CA 92101

CASE NUMBER:
(Número del Caso):

37-2018-00019869-CU-NP-CTL

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:

(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):
Abbas Kazerounian, Esq. 245 Fisher Ave., Unit D1, Costa Mesa, CA 92626, Telephone No. (800) 400-6808

DATE: 04/23/2018

(Fecha)

Clerk, by

(Secretario)

G. Dixon-Cosby

, Deputy

(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).



NOTICE TO THE PERSON SERVED: You are served

1. as an individual defendant.
2. as the person sued under the fictitious name of (specify):
3. on behalf of (specify):

under: <input type="checkbox"/> CCP 416.10 (corporation)	<input type="checkbox"/> CCP 416.60 (minor)
<input type="checkbox"/> CCP 416.20 (defunct corporation)	<input type="checkbox"/> CCP 416.70 (conservatee)
<input type="checkbox"/> CCP 416.40 (association or partnership)	<input type="checkbox"/> CCP 416.90 (authorized person)
<input type="checkbox"/> other (specify):	
4. by personal delivery on (date):

Exhibit D

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO	
STREET ADDRESS: 330 W Broadway	
MAILING ADDRESS: 330 W Broadway	
CITY AND ZIP CODE: San Diego, CA 92101-3827	
BRANCH NAME: Central	
TELEPHONE NUMBER: (619) 450-7072	
PLAINTIFF(S) / PETITIONER(S): John Wilson et.al.	
DEFENDANT(S) / RESPONDENT(S): Experian Information Solutions Inc	
WILSON VS EXPERIAN INFORMATION SOLUTIONS INC [E-FILE]	
NOTICE OF CASE ASSIGNMENT AND CASE MANAGEMENT CONFERENCE on MANDATORY eFILE CASE	CASE NUMBER: 37-2018-00019869-CU-NP-CTL

CASE ASSIGNMENT

Judge: Timothy Taylor

Department: C-72

COMPLAINT/PETITION FILED: 04/20/2018

TYPE OF HEARING SCHEDULED	DATE	TIME	DEPT	JUDGE
Civil Case Management Conference	09/21/2018	09:45 am	C-72	Timothy Taylor

A case management statement must be completed by counsel for all parties or self-represented litigants and timely filed with the court at least 15 days prior to the initial case management conference. (San Diego Local Rules, Division II, CRC Rule 3.725).

All counsel of record or parties in pro per shall appear at the Case Management Conference, be familiar with the case, and be fully prepared to participate effectively in the hearing, including discussions of ADR* options.

IT IS THE DUTY OF EACH PLAINTIFF (AND CROSS-COMPLAINANT) TO SERVE A COPY OF THIS NOTICE WITH THE COMPLAINT (AND CROSS-COMPLAINT), THE ALTERNATIVE DISPUTE RESOLUTION (ADR) INFORMATION FORM (SDSC FORM #CIV-730), A STIPULATION TO USE ALTERNATIVE DISPUTE RESOLUTION (ADR) (SDSC FORM #CIV-359), AND OTHER DOCUMENTS AS SET OUT IN SDSC LOCAL RULE 2.1.5.

ALL COUNSEL WILL BE EXPECTED TO BE FAMILIAR WITH SUPERIOR COURT RULES WHICH HAVE BEEN PUBLISHED AS DIVISION II, AND WILL BE STRICTLY ENFORCED.

TIME STANDARDS: The following timeframes apply to general civil cases and must be adhered to unless you have requested and been granted an extension of time. General civil cases consist of all civil cases except: small claims proceedings, civil petitions, unlawful detainer proceedings, probate, guardianship, conservatorship, juvenile, parking citation appeals, and family law proceedings.

COMPLAINTS: Complaints and all other documents listed in SDSC Local Rule 2.1.5 must be served on all named defendants.

DEFENDANT'S APPEARANCE: Defendant must generally appear within 30 days of service of the complaint. (Plaintiff may stipulate to no more than 15 day extension which must be in writing and filed with the Court.) (SDSC Local Rule 2.1.6)

JURY FEES: In order to preserve the right to a jury trial, one party for each side demanding a jury trial shall pay an advance jury fee in the amount of one hundred fifty dollars (\$150) on or before the date scheduled for the initial case management conference in the action.

MANDATORY eFILE: Case assigned to mandatory eFile program per CRC 3.400-3.403 and SDSC Rule 2.4.11. All documents must be eFiled at www.onelegal.com. Refer to General Order in re procedures regarding electronically imaged court records, electronic filing, and access to electronic court records in civil and probate cases or guidelines and procedures.

COURT REPORTERS: Court reporters are not provided by the Court in Civil cases. See policy regarding normal availability and unavailability of official court reporters at www.sdcourt.ca.gov.

*ALTERNATIVE DISPUTE RESOLUTION (ADR): THE COURT ENCOURAGES YOU TO CONSIDER UTILIZING VARIOUS ALTERNATIVES TO TRIAL, INCLUDING MEDIATION AND ARBITRATION, PRIOR TO THE CASE MANAGEMENT CONFERENCE. PARTIES MAY FILE THE ATTACHED STIPULATION TO USE ALTERNATIVE DISPUTE RESOLUTION (SDSC FORM #CIV-359).

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CERTIFICATE OF SERVICE

I, Kim N. Edmonds, declare:

I am a citizen of the United States and employed in Orange County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 3161 Michelson Drive, Suite 800, Irvine, California 92612.4408. On June 12, 2018, I served a copy of the within document(s):

EXPERIAN INFORMATION SOLUTIONS, INC.’S NOTICE OF REMOVAL

- by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.
- by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Irvine, California addressed as set forth below.
- by placing the document(s) listed above in a sealed _____ envelope and affixing a pre-paid air bill, and causing the envelope to be delivered to a _____ agent for delivery.
- by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.
- by transmitting via e-mail or electronic transmission the document(s) listed above to the person(s) at the e-mail address(es) set forth below.

Abbas Kazerounian Mona Amini Veronica Cruz Kazerouni Law Group, APC 245 Fischer Avenue, Unit D1 Costa Mesa, CA 92626 Email: ak@kazlg.com Email: Mona@kazlg.com Email: veronica@kazlg.com Tel: (800) 400-6808 Fax: (800) 520-5523	<p style="text-align: center;"><i>Attorneys for Plaintiffs, John Wilson and Nieysha White</i></p>
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Joshua B. Swigart Hyde & Swigart 2221 Camino Del Rio South, Ste. 101 San Diego, CA 92108 Email: josh@westcoastlitigation.cpm	
Daniel G. Shay Law Offices of Daniel G. Shay 409 Camino Del Rio South, Suite 101B San Diego, CA 92108 Email: danielshay@tcpafdcpa.com Tel: (619) 222-7249 Fax: (866) 431-3292	

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on June 12, 2018, at Irvine, California.

/s/ Kim N. Edmonds

Kim N. Edmonds

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Experian Reported Inaccurate Bankruptcy Court Information, Consumers Allege](#)
