

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

CASE NO.

CAROLYN YOUNG, a/k/a CARRIE YOUNG, *on behalf of  
herself and all others similarly situated,*

Plaintiffs,

v.

NORTHLAND GROUP LLC,  
*a Minnesota Limited Liability Company,* and  
CAVALRY INVESTMENTS, LLC,  
*a Delaware Limited Liability Company,* and  
CAVALRY PORTFOLIO SERVICES, LLC,  
*a Delaware Limited Liability Company,*

Defendants.

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**CLASS ACTION COMPLAINT**

1. Plaintiff, Carolyn Young, a/k/a Carrie Young, alleges violations of the *Fair Debt Collection Practices Act*, 15 U.S.C. §1692 *et seq.* (“FDCPA”).

**JURISDICTION AND VENUE**

2. This Court has jurisdiction under 28 U.S.C. §1331, and 15 U.S.C. §1692k. Venue in this District is proper because Defendants conduct business in this District.

**PARTIES**

3. Plaintiff, Carolyn Young, a/k/a Carrie Young (“Plaintiff”), is a natural person and citizen of the State of Florida, residing in Palm Beach County, Florida.

4. Defendant, Northland Group LLC, formerly Northland Group, Inc.,<sup>1</sup> (“Northland”), is a Minnesota Limited Liability Company engaged in the business of collecting consumer debts, which operates from offices located at 7831 Glenroy Road, Suite 250, Edina, Minnesota 55439. Northland Group, Inc. is still a licensed consumer debt collector in Florida having license number CCA0900498.

5. Defendant, Cavalry Investments, LLC (“CI”), is a Delaware Limited Liability Company engaged in the business of collecting consumer debts, which operates from offices located at 500 Summit Lake Drive, Suite 400, Valhalla, NY 10595. Defendant CI is a licensed consumer debt collector in Florida having license number CCA9902650.

6. Defendant, Cavalry Portfolio Services, LLC (“CPS”), is a Delaware Limited Liability Company engaged in the business of collecting consumer debts, which operates from offices located at 500 Summit Lake Drive, Suite 400, Valhalla, NY 10595. Defendant CPS is a licensed consumer debt collector in Florida having license number CCA9902186.

7. Defendant Northland Group LLC, Defendant Cavalry Investments, LLC, and Defendant Cavalry Portfolio Services, LLC shall collectively be referred to herein as “Defendants.”

8. Defendants regularly use the United States Postal Service and telephone in the collection of consumer debt.

9. Defendants regularly collect or attempt to collect debts for other parties. Defendants are “debt collectors” as defined in the *FDCPA*.

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<sup>1</sup> Northland Group, Inc., pursuant to Minnesota statutes, converted to a Limited Liability Company effective April 28, 2017 and became Northland Group LLC. Northland Group LLC registered to conduct business in Florida on May 2, 2017 and was assigned document number M17000003761.

10. At all times material to the allegations of this Complaint, Defendants were acting as debt collectors with respect to the collection of Plaintiff's alleged debt.

11. Defendant CI purchased Plaintiff's debt while in default.

**FACTUAL ALLEGATIONS**

12. Defendants sought to collect from Plaintiff an alleged debt incurred by Plaintiff for personal, family, or household purposes.

13. On or about June 4, 2016, Defendant Northland sent a demand letter to Plaintiff that sought to collect an alleged debt due to Defendant Cavalry Investments, LLC on behalf of Northland's client, Defendant Cavalry Portfolio Services, LLC (The "Demand Letter"). Attached hereto as "Exhibit 1."

14. The Demand Letter was Defendants' initial communication with Plaintiff with respect to the debt alleged therein.

15. The Defendants' Demand Letter stated in part:

Your past due account balance: \$3,631.47  
Your settlement offer: \$1,634.16

XXXX

The above referenced CAVALRY PORTFOLIO SERVICES account has been assigned to Northland Group, Inc. for collection. CAVALRY PORTFOLIO SERVICES is willing to reduce your balance by offering you a settlement. We are not obligated to renew this offer. Upon receipt and clearance of \$1,634.16, a letter will be sent confirming the above referenced account has been resolved. This offer does not affect your rights set forth below.

XXXX

The law limits how long you can be sued on a debt. Because of the age of your debt, our client will not sue you for it. In many circumstances, you can renew the debt and start the time period for the filing of a lawsuit against you if you take specific actions such as making certain payment on the debt or making a written promise

to pay. You should determine the effect of any actions you take with respect to this debt.

16. *15 U.S.C. §1692e(10)* states:

A debt collector may not use any false, deceptive, or misleading representation or means in connection with the collection of any debt. Without limiting the general application of the foregoing, the following conduct is a violation of this section:

xxxx

(10) The use of any false representation or deceptive means to collect or attempt to collect any debt or to obtain information concerning a consumer.

**CLASS ACTION ALLEGATIONS**  
**AS TO ALL DEFENDANTS**

17. This action is brought on behalf of a Class consisting of (i) all persons with addresses in the Florida Counties that comprise the geographical boundaries of the United States District Court for the Southern District of Florida, namely Miami-Dade, Monroe, Broward, Palm Beach, Martin, Saint Lucie, Indian River, Okeechobee, and Highlands Counties (ii) to whom letters that contained the language: “The law limits how long you can be sued on a debt. Because of the age of your debt, our client will not sue you for it.” (iii) that were mailed, or caused to be mailed, by Defendant Northland on behalf of Cavalry Portfolio Services, LLC for a debt alleged to be owed to Cavalry Investments, LLC (iv) that were not returned undeliverable by the U.S. Post Office (v) in an attempt to collect a debt incurred for personal, family, or household purposes (vi) during the one-year period prior to the filing of the original Complaint in this action through the date of certification.

18. Plaintiff alleges on information and belief based upon the Defendants’ use of the phrase: “The law limits how long you can be sued on a debt. Because of the age of your debt, our

client will not sue you for it.” in its letters served upon the Class is so numerous that joinder of all members of the Class is impractical.

19. There are questions of law or fact common to the Class, which common issues predominate over any issues involving only individual Class members. The factual issue common to each Class member is that each was mailed, or caused to be mailed, a letter by Defendant Northland on behalf of Cavalry Portfolio Services, LLC for a debt alleged to be owed to Cavalry Investments, LLC that contained the phrase: “The law limits how long you can be sued on a debt. Because of the age of your debt, our client will not sue you for it.” The common principal legal issue is whether Defendant Northland’s wording violated the *FDCPA* by misleadingly stating that “our client will not sue you” to collect the balance while not stating that the debt was time barred and that the creditor could not lawfully sue to recover the debt.

20. Plaintiff’s claims are typical of those of the Class members. All are based on the same facts and legal theories.

21. Plaintiff will fairly and adequately protect the interests of the Class. Plaintiff has retained counsel experienced in handling actions involving unlawful practices under the *FDCPA* and Class actions. Neither Plaintiff nor her counsel have any interests which might cause them not to vigorously pursue this action.

22. Certification of the Class under *Rule 23(b)(3)* of the *Federal Rules of Civil Procedure* is also appropriate in that: (1) the questions of law or fact common to the members of the class predominate over any questions affecting an individual member; and (2) a class action is superior to other available methods for the fair and efficient adjudication of the controversy.

23. Plaintiff requests certification of a Class under *Rule 23(b)(3)*, of the *Federal Rules of Civil Procedure*, for monetary damages; her appointment as Class Representative; and that her attorney, Leo W. Desmond, be appointed Class Counsel.

**COUNT I**  
**VIOLATION OF 15 U.S.C. §1692e**  
**CLASS CLAIM AGAINST ALL DEFENDANTS**

24. Plaintiff re-alleges and incorporates Paragraphs 1 through 11 and Paragraphs 12 through 16.

25. *15 U.S.C. §1692e* states:

A debt collector may not use any false, deceptive, or misleading representation or means in connection with the collection of any debt. Without limiting the general application of the foregoing, the following conduct is a violation of this section:

xxxx

(10) The use of any false representation or deceptive means to collect or attempt to collect any debt or to obtain information concerning a consumer.

26. Defendant Northland sent the Demand Letter to Plaintiff on behalf of its client, Defendant Cavalry Portfolio Services, LLC on a debt alleged to be owed to Defendant Cavalry Investments, LLC in an attempt to collect a consumer debt, namely to collect alleged debts from Plaintiff's credit card usage.

27. The Demand Letter states in pertinent part: "The law limits how long you can be sued on a debt. Because of the age of your debt, our client will not sue you for it." ("The Phrase").

28. The Phrase does not state that the debt cannot be collected because the applicable statute of limitations has expired, making the filing of a lawsuit to collect the debt time barred.

29. The Phrase states that the “client will not sue you”, meaning that Northland’s client has voluntarily chosen not to sue to collect the debt as opposed to stating that the client could not sue to collect the time-barred debt.

30. The Phrase does not state that Northland’s client cannot legally sue to collect the debt due to the age of the debt and the fact that the statute of limitations precludes such a collection lawsuit.

31. The Phrase can be interpreted more than one way, such as that while Northland’s client will not sue, any subsequent creditor could bring a collection lawsuit.

32. As a result of Defendants’ conduct, Plaintiff and the Class are entitled to an award of statutory damages pursuant to *15 U.S.C. §1692k*.

33. As a result of Defendants’ conduct, Plaintiff and the Class are entitled to an award of costs and attorney’s fees pursuant to *15 U.S.C. §1692k*.

**WHEREFORE**, Plaintiff requests that the Court enter judgment in her favor against Defendants that includes:

- a. An Order certifying this matter as a Class action and appointment of Plaintiff as Class Representative as to all claims against Defendants;
- b. An Order appointing Leo W. Desmond as Class Counsel;
- c. An award of statutory damages for Plaintiff and the Class pursuant to *15 U.S.C. §1692k* for all Class claims;
- d. An award of attorney’s fees, litigation expenses and costs of the instant suit; and
- e. Such other or further relief as the Court deems proper.

Dated: May 31, 2017.

Respectfully submitted,

/s/ Leo W. Desmond

Leo W. Desmond, Esquire  
Florida Bar Number 0041920  
DESMOND LAW FIRM, P.C.  
5070 Highway A1A, Suite D  
Vero Beach, Florida 32963  
Telephone: 772.231.9600  
Facsimile: 772.231.0300  
lwd@desmondlawfirm.com  
*Attorney for Plaintiff*



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.) **NOTICE: Attorneys MUST Indicate All Re-filed Cases Below.**

**I. (a) PLAINTIFFS** Carolyn Young, aka Carrie Young **DEFENDANTS** Northland Group LLC, Cavalry Investments, LLC, and Cavalry Portfolio Services, LLC

**(b)** County of Residence of First Listed Plaintiff **Palm Beach** County of Residence of First Listed Defendant  
(EXCEPT IN U.S. PLAINTIFF CASES) (IN U.S. PLAINTIFF CASES ONLY)

**(c)** Attorneys (Firm Name, Address, and Telephone Number) Attorneys (If Known)  
Leo W. Desmond, Desmond Law Firm, P.C. IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.  
5070 Highway A1A, Suite D, Vero Beach, FL 32963 772-231-9600

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

<b>II. BASIS OF JURISDICTION</b> (Place an "X" in One Box Only)		<b>III. CITIZENSHIP OF PRINCIPAL PARTIES</b> (Place an "X" in One Box for Plaintiff and One Box for Defendant)			
<input type="checkbox"/> 1 U.S. Government Plaintiff	<input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)	<input type="checkbox"/> PTF Citizen of This State	<input type="checkbox"/> DEF Incorporated or Principal Place of Business In This State	<input type="checkbox"/> PTF 4	<input type="checkbox"/> DEF 4
<input type="checkbox"/> 2 U.S. Government Defendant	<input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	<input type="checkbox"/> PTF Citizen of Another State	<input type="checkbox"/> DEF Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> PTF 5	<input type="checkbox"/> DEF 5
		<input type="checkbox"/> PTF Citizen or Subject of a Foreign Country	<input type="checkbox"/> DEF Foreign Nation	<input type="checkbox"/> PTF 6	<input type="checkbox"/> DEF 6

<b>IV. NATURE OF SUIT</b> (Place an "X" in One Box Only)					
<b>CONTRACT</b>		<b>TORTS</b>	<b>FORFEITURE/PENALTY</b>	<b>BANKRUPTCY</b>	<b>OTHER STATUTES</b>
<input type="checkbox"/> 110 Insurance	<b>PERSONAL INJURY</b>	<b>PERSONAL INJURY</b>	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 375 False Claims Act
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 365 Personal Injury - Product Liability	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 376 Qui Tam (31 USC 3729 (a))
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury Product Liability		<b>PROPERTY RIGHTS</b>	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability		<input type="checkbox"/> 820 Copyrights	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Federal Employers' Liability			<input type="checkbox"/> 830 Patent	<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 340 Marine	<b>PERSONAL PROPERTY</b>	<b>LABOR</b>	<input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans)	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 710 Fair Labor Standards Act		<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 720 Labor/Mgmt. Relations	<b>SOCIAL SECURITY</b>	<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 740 Railway Labor Act	<input type="checkbox"/> 861 HIA (1395ff)	<input type="checkbox"/> 480 Consumer Credit
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 751 Family and Medical Leave Act	<input type="checkbox"/> 862 Black Lung (923)	<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 362 Personal Injury - Med. Malpractice		<input type="checkbox"/> 790 Other Labor Litigation	<input type="checkbox"/> 863 DIWC/DIWW (405(g))	<input type="checkbox"/> 850 Securities/Commodities/ Exchange
<input type="checkbox"/> 196 Franchise		<b>PRISONER PETITIONS</b>	<input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 864 SSID Title XVI	<input checked="" type="checkbox"/> 890 Other Statutory Actions
	<b>REAL PROPERTY</b>	<b>Habeas Corpus:</b>		<input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 891 Agricultural Acts
	<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 463 Alien Detainee			<input type="checkbox"/> 893 Environmental Matters
	<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 510 Motions to Vacate Sentence		<b>FEDERAL TAX SUITS</b>	<input type="checkbox"/> 895 Freedom of Information Act
	<input type="checkbox"/> 230 Rent Lease & Ejectment	<b>Other:</b>		<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)	<input type="checkbox"/> 896 Arbitration
	<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 530 General		<input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision
	<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 535 Death Penalty	<b>IMMIGRATION</b>		<input type="checkbox"/> 950 Constitutionality of State Statutes
	<input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 540 Mandamus & Other	<input type="checkbox"/> 462 Naturalization Application		
		<input type="checkbox"/> 550 Civil Rights	<input type="checkbox"/> 465 Other Immigration Actions		
		<input type="checkbox"/> 555 Prison Condition			
		<input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

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

<input checked="" type="checkbox"/> 1 Original Proceeding	<input type="checkbox"/> 2 Removed from State Court	<input type="checkbox"/> 3 Re-filed (See VI below)	<input type="checkbox"/> 4 Reinstated or Reopened	<input type="checkbox"/> 5 Transferred from another district (specify)	<input type="checkbox"/> 6 Multidistrict Litigation Transfer	<input type="checkbox"/> 7 Appeal to District Judge from Magistrate Judgment	<input type="checkbox"/> 8 Multidistrict Litigation - Direct File	<input type="checkbox"/> 9 Remanded from Appellate Court
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<b>VI. RELATED/ RE-FILED CASE(S)</b>	(See instructions): a) Re-filed Case <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	b) Related Cases <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>JUDGE:</b>	<b>DOCKET NUMBER:</b>	

**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 et seq. Violation of the Fair Debt Collection Practices Act.  
LENGTH OF TRIAL via 4 days estimated (for both sides to try entire case)

<b>VIII. REQUESTED IN COMPLAINT:</b>	<input checked="" type="checkbox"/> CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23	<b>DEMAND \$</b> 1,500,000.00	CHECK YES only if demanded in complaint:
		<b>JURY DEMAND:</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

ABOVE INFORMATION IS TRUE & CORRECT TO THE BEST OF MY KNOWLEDGE  
DATE May 31, 2017  
SIGNATURE OF ATTORNEY OF RECORD  
Leo W. Desmond FL Bar 0041920

**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.C.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; federal question actions take precedence over diversity cases.)

**III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.

**IV. Nature of Suit.** Place an "X" in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerks in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.

**V. Origin.** Place an "X" in one of the 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.

Refiled (3) Attach copy of Order for Dismissal of Previous case. Also complete VI.

Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.

Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.

Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.

Appeal to District Judge from Magistrate Judgment. (7) Check this box for an appeal from a magistrate judge's decision.

Remanded from Appellate Court. (8) Check this box if remanded from Appellate Court.

**VI. Related/Refiled Cases.** This section of the JS 44 is used to reference related pending cases or re-filed cases. Insert the docket numbers and the corresponding judges name for such cases.

**VII. 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

**VIII. 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 dollar amount (in thousands of dollars) 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.

**Date and Attorney Signature.** Date and sign the civil cover sheet.

*Signature of Clerk or Deputy Clerk*

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE***(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
 was received by me on *(date)* \_\_\_\_\_ .

☐ I personally served the summons on the individual at *(place)* \_\_\_\_\_  
 \_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
 \_\_\_\_\_, a person of suitable age and discretion who resides there,  
 on *(date)* \_\_\_\_\_, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* \_\_\_\_\_, who is  
 designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
 \_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

☐ I returned the summons unexecuted because \_\_\_\_\_ ; or

☐ Other *(specify)*: \_\_\_\_\_

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ 0.00 .

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

Signature of Clerk or Deputy Clerk

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE***(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
 was received by me on *(date)* \_\_\_\_\_ .

☐ I personally served the summons on the individual at *(place)* \_\_\_\_\_  
 \_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
 \_\_\_\_\_, a person of suitable age and discretion who resides there,  
 on *(date)* \_\_\_\_\_, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* \_\_\_\_\_, who is  
 designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
 \_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

☐ I returned the summons unexecuted because \_\_\_\_\_ ; or

☐ Other *(specify)*: \_\_\_\_\_

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ 0.00 .

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

Signature of Clerk or Deputy Clerk

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE***(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
 was received by me on *(date)* \_\_\_\_\_ .

☐ I personally served the summons on the individual at *(place)* \_\_\_\_\_  
 \_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
 \_\_\_\_\_, a person of suitable age and discretion who resides there,  
 on *(date)* \_\_\_\_\_, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* \_\_\_\_\_, who is  
 designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
 \_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

☐ I returned the summons unexecuted because \_\_\_\_\_ ; or

☐ Other *(specify)*: \_\_\_\_\_

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ 0.00 .

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:





Northland Group Inc.

866-641-6872 ext 3509  
For General Business Hours, please visit us at:  
[www.payments2northland.com](http://www.payments2northland.com)

June 4, 2016



P.O. Box 39046  
Minneapolis, MN 55439  
Mail Code CVR101

ACCOUNT INFORMATION

Client: CAVALRY PORTFOLIO SERVICES  
Current Creditor: Cavalry Investments, LLC  
Original Creditor: HSBC RETAIL CARD SERVICES, INC.  
Original Account #: \*\*\*\*\*0359

Carolyn Young  
Po Box 3601  
Boynton Beach, FL 33424

NORTHLAND REFERENCE NUMBER

F66001233



Your past due account balance: \$3,631.47  
Your settlement offer: \$1,634.16

Dear Carolyn Young,

The above referenced CAVALRY PORTFOLIO SERVICES account has been assigned to Northland Group, Inc. for collection. CAVALRY PORTFOLIO SERVICES is willing to reduce your balance by offering you a settlement. We are not obligated to renew this offer. Upon receipt and clearance of \$1,634.16, a letter will be sent confirming the above referenced account has been resolved. This offer does not affect your rights set forth below.

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of this debt, or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days after receiving this notice that you dispute the validity of this debt, or any portion thereof, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request of this office in writing within 30 days after receiving this notice this office will provide you with the name and address of the original creditor, if different from the current creditor.

Thank you,

Northland Group, Inc.

The law limits how long you can be sued on a debt. Because of the age of your debt, our client will not sue you for it. In many circumstances, you can renew the debt and start the time period for the filing of a lawsuit against you if you take specific actions such as making certain payment on the debt or making a written promise to pay. You should determine the effect of any actions you take with respect to this debt.



Pay Online: [www.payments2northland.com](http://www.payments2northland.com)



Pay by Phone: Please call Northland Group, Inc. at 866-641-6872 ext 3509.  
We offer check by phone, Western Union, and debit card.



Pay by Mail: Send payments to PO Box 390846, Minneapolis, MN 55439.

This is an attempt to collect a debt by a debt collector and any information obtained will be used for that purpose.

This communication is sent to you by Northland Group, Inc., a debt collector and a member of ACA International. Northland Group is a collection agency. We do not sue people and we cannot and will not sue you on any account placed with our office.

# ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Florida Woman Hits Three Debt Collectors with Class Action](#)

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