

IN THE CRAWFORD COUNTY DISTRICT COURT - VAN BUREN DEPT
CIVIL DIVISION

CRAWFORD COUNTY
DISTRICT COURT
VAN BUREN DIVISION
5TH JUDICIAL DISTRICT
PLAINTIFF
2023 MAR -1 PM 12:32

MIDLAND CREDIT
MANAGEMENT, INC.

v.

No.

VACV-23-88

BY AL
DEFENDANT

JESSICA PALMER
12106 SHEPHERD LN
MOUNTAINBURG AR
729463353

COMPLAINT

Plaintiff, MIDLAND CREDIT MANAGEMENT, INC., by counsel, sues Defendant, JESSICA PALMER, under Account Stated and in support thereof states:

1. Plaintiff is authorized to file this Complaint in this Court. Plaintiff owns portfolios of consumer receivables, which it attempts to collect. Plaintiff strives to treat its consumers, such as Defendant, with respect, compassion and integrity, hoping to provide mutually-beneficial opportunities for consumers to repay their debts and attain financial recovery.
2. Defendant is subject to this Court's jurisdiction.
3. Defendant established an account with COMENTY BANK, under redacted account number XXXXXXXXXXXXX-0675.
4. Defendant was provided statements delineating Defendants use of the account and stating the current balance due.
5. Defendant defaulted on the account.
6. A statement of account balance was sent to Defendant and not paid.
7. Plaintiff has acquired all right, title and interest to Defendant's account, and has attempted to contact Defendant through several means in an effort to resolve the account with Defendant, but has been unsuccessful. Defendant has not repaid the balance owed on the account. Plaintiff remains willing to discuss various options to resolve the outstanding obligation, although the options may be different than they were prior to the initiation of litigation.
8. Defendant owes Plaintiff \$1,182.66.
9. In support of the allegations, Plaintiff incorporates herein by reference the attached Exhibits.



S-4388425 - JJL PROCESS

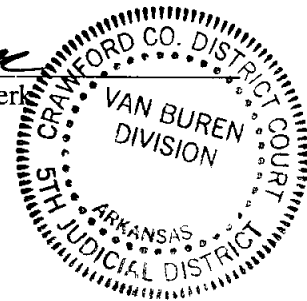
WHEREFORE, Plaintiff requests judgment against the Defendant for \$1,182.66 and costs of the action and post judgment interest at the statutory rate.

By: *Kimberly P. Gloss*
KEITH A. AIKEN 2010036
KIMBERLY P. GLOSS 2020289
Attorneys for Plaintiff
P.O. BOX 772719
MEMPHIS, TN 38177-2719
Phone: (866) 300-8750
Fax: (877) 653-2426
arkansasattorneys@mcmcg.com

SUMMONS AND NOTICE TO DEFENDANT

You are hereby warned to file a written answer with the clerk of the court within 30 days after the date that you receive this complaint and to send a copy to the plaintiff or to his or her attorney. If you do not file an answer within 30 days, or if you fail to file an answer, a default judgment may be entered against you.

[Signature]
District Court Clerk
PROOF OF SERVICE



STATE OF ARKANSAS

COUNTY OF _____

I, _____, hereby certify that I served the within complaint on the defendant,
_____ at o'clock _____ m. on _____ 2023, by
_____.

Signature/Office

Subscribed and sworn to before me this _____ day of _____ 2023,
[To be completed if service is by someone other than sheriff or constable.]

Notary Public or Court Clerk

My Commission Expires: _____

PLEASE UNDERSTAND THIS COMMUNICATION IS FROM A DEBT COLLECTOR.
THIS IS AN ATTEMPT TO COLLECT A DEBT.
ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

EXHIBIT A

BILL OF SALE


Comenity Bank ("Seller"), for value received and pursuant to the terms and conditions of that certain Credit Card Account Purchase Agreement dated October 25, 2019 between Seller and Midland Credit Management, Inc. ("Purchaser"), its successors and assigns ("Credit Card Account Purchase Agreement"), hereby assigns effective as of the Closing Date of November 16, 2021 all rights, title and interest of Seller in and to those certain Accounts described in the Credit Card Account Purchase Agreement and Schedule 1 (the "Asset Schedule") attached hereto and made part hereof for all purposes, to Purchaser.

The information contained in the Sale File (collectively, "Seller's Accounts Information") is true and complete as of the File Creation Date. Further, all of the information contained in Seller's Accounts Information (a) constitutes Seller's own business records regarding the Accounts and (b) accurately reflects in all material respects the information about the Accounts in Seller's possession. All of Seller's Accounts Information has been kept in the regular course of Seller's business, and was made or compiled at or near the time of the event and recorded by (or from information transmitted by) a person (i) with knowledge of the data entered into and maintained in Seller's business records, or (ii) who caused the data to be entered into and maintained in Seller's business records. All capitalized terms used, but not defined, in this Bill of Sale shall have the meanings assigned to such term in the Credit Card Account Purchase Agreement.

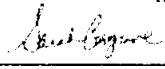


This Bill of Sale is executed without recourse except as stated in the Credit Card Account Purchase Agreement to which this is an Exhibit. No other representation of or warranty of title or enforceability is expressed or implied.

COMENITY BANK

By: 
Date: 12/6/21
Title: Chief Credit Officer

Midland Credit Management, Inc.

By: 
Date: 12/16/2021
Title: MVP of BD

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.