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8 File No.: 1033373

Electronically  
**FILED**  
by Superior Court of California, County of San Mateo  
ON 4/25/2024  
By /s/ Hessen Ladcani  
Deputy Clerk

9 **SUPERIOR COURT OF CALIFORNIA**

10 **COUNTY OF SAN MATEO**

11 PORTFOLIO RECOVERY ASSOCIATES, LLC

12 Plaintiff,

13 v.

14 JENNIFER WILSON,  
15 and DOES 1 to 25.

16 Defendant(s).

24-CLJ-02547  
CASE NO.

**COMPLAINT FOR:**

(1) Account Stated

PRAYER AMOUNT: \$1,843.74

LIMITED CIVIL

17 Plaintiff, PORTFOLIO RECOVERY ASSOCIATES, LLC, ("Plaintiff") alleges:

18 1. Plaintiff is a limited liability company.

19 2. This court is the proper court because Plaintiff is informed and believes that Defendant, JENNIFER  
20 WILSON ("Defendant"), is a resident of SAN MATEO County, State of California.

21 3. At all times herein mentioned, Defendants, and each of them, were the principals, agents, employers,  
22 employees, masters, or servants of each of their co-defendants and ratified, adopted or approved the acts or  
23 omissions alleged herein, and each defendant, in doing the things alleged, were acting in the course and  
24 scope of said authority of such agents, servants, and employees.  
25  
26  
27  
28

1 4. This suit concerns a credit account that was purchased by Plaintiff on or after January 1, 2014 and,  
2 therefore, is subject to California Civil Code § 1788.50; *et seq.*

3 **COMPLIANCE WITH CIVIL CODE § 1788.50, *et seq.***

4 Pursuant to California Civil Code § 1788.58(a)(1)-(9):

5  
6 5. Plaintiff is a debt buyer.

7 6. A SYNCHRONY BANK credit account was issued to Defendant on or about December 06,  
8 2015. Defendant used, or authorized the use of, the credit account to make purchases and/or  
9 transactions. Defendant received periodic billing statements for the credit account. Defendant  
10 defaulted in making the required payments. Subsequently, Plaintiff was assigned and transferred all  
11 rights, title and interest in the credit account. The account was assigned, transferred and sold to  
12 Plaintiff by SYNCHRONY BANK.

13  
14 7. Plaintiff is the sole owner of the credit account at issue, or has authority to assert the rights of all  
15 owners of the debt.

16  
17 8. The balance at charge-off was \$1,880.74. Plaintiff is not seeking to recover any post charge-off  
18 fees or interest.

19 9. The date of last payment on the credit account was June 05, 2020.

20 10. The name and an address of the creditor at the time of charge-off was SYNCHRONY BANK  
21 170 E ELECTION RD, DRAPER UT 84020. At the time of charge-off, the charge-off creditor's  
22 account number associated with the debt ended in XXXXXXXXXXXXXXX2829.

23  
24 11. The name and last known address of the Defendant as they appeared in the charge-off  
25 creditor's records prior to the sale of the debt: JENNIFER WILSON, 112 EDISON AVE, SOUTH  
26 SAN FRANCISCO, CA, 94080-1622.

1 12. The names and addresses of all persons or entities that purchased the debt after charge off,  
2 include the Plaintiff debt buyer: Portfolio Recovery Associates, LLC, which maintains an address at  
3 120 Corporate Blvd, Norfolk, VA 23502.  
4

5 13. Plaintiff has complied with the requirements of Civil Code **Section 1788.52**. Notably, Section  
6 1788.52(a)(7) requires that Plaintiff possess the California debt buyer license number when making any  
7 written statements to a debtor in an attempt to collect a consumer debt. The legislation that created this  
8 requirement also stated that the licensing provisions **shall become operative January 1, 2022**, and that  
9 a debt collector that submits an application prior to January 1, 2022 may operate pending the approval  
10 or denial of the application.  
11

12 14. Attached hereto as Exhibit A is a true and correct copy of a document required by section  
13 1788.58(b) of the California Civil Code.  
14

15 **FIRST CAUSE OF ACTION:**

16 **ACCOUNT STATED**

17 15. Plaintiff alleges and incorporates by reference the foregoing paragraphs.

18 16. Within the last four years, an account was stated in writing between Defendant and  
19 SYNCHRONY BANK and on the account a balance was stated to be due to SYNCHRONY BANK,  
20 from Defendant. Defendant expressly or impliedly agreed to pay SYNCHRONY BANK, that balance.  
21 Attached hereto as Exhibit B is a true and correct copy of a billing statement showing the balance due  
22 and owing.  
23

24 17. Before the commencement of this action, Plaintiff was assigned the credit account and  
25 indebtedness. Plaintiff is now the owner and holder of the credit account.

26 18. Plaintiff has made demand on Defendant for repayment of the credit account, but Defendant has  
27 failed to pay the balance due.  
28

1 19. Payments, set-offs, credits or allowances, if any, at or after charge off, have been posted to the  
2 credit account.

3 20. The current balance presently due and owing is \$1,843.74.  
4

5  
6 **WHEREFORE**, Plaintiff prays for judgment against Defendant as follows:

7 **On the First Cause of Action:**

- 8 1. For the unpaid principal balance of \$1,843.74;  
9  
10 2. Costs of suit; and  
11 3. Any such other relief as the Court may deem just and proper.

12 DATED: March 29, 2024  
13  
14  
15

16 By: 

- 
- 17  
18  Jordan Cook, Esq. Bar No. 179720  
19  Emily Pierce, Esq. Bar No. 240084  
20  Gregory J. Babcock, Esq. Bar No. 260437  
21  Kristen Kohler, Esq. Bar No. 263579  
22  Lori Williams, Esq. Bar No. 242985  
23 Attorneys for Plaintiff  
24 **Portfolio Recovery Associates, LLC**  
25 www.PRApay.com  
26  
27  
28

# EXHIBIT A

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