IN THE COUNTY COURT IN AND FOR DUVAL COUNTY, FLORIDA

PORTFOLIO RECOVERY ASSOCIATES, LLC, Plaintiff.

CASE NO .:

VS.

NATASHA PEREZ Defendant.

## **Complaint**

Plaintiff sues Defendant for damages, and would allege:

- 1. This is an action for damages less than \$8,000.
- 3. Defendant did make purchases and charged same to the Account, but after statements were provided to Defendant, Defendant failed to make the monthly payments due upon the Account and failed to object to the balance then owing within a reasonable time, resulting in an Account Stated in the sum of \$1,812.99 (See Attached).
- 4. Plaintiff is the successor in interest of said Account having purchased said Account in good faith, for value, and in the ordinary course of business. (See Attached).
- 5. Plaintiff received the attached records of the original creditor pursuant to its purchase of the Defendant's account. Plaintiff independently checked the records for accuracy, and then integrated the records into their own business records.
- 6. Plaintiff has declared Defendant to be in default and demands payment of the balance due on the Account. Defendant has refused said demand.
- 7. Defendant is indebted to Plaintiff in the sum of \$1,812.99.
- 8. All conditions precedent to this action have occurred.



 Pursuant to Rule 2.516, Plaintiff designates the following email addresses for the purpose of service of all documents required to be served pursuant to Rule 2.516 in this proceeding.
Primary E-Mail Address: LitigationService@Portfoliorecovery.com and Secondary Address: Florida\_RA@portfoliorecovery.com.

WHEREFORE, Plaintiff demands Judgment against Defendant for \$1,812.99, plus costs.

/s/ John Bacus De Jesus Date: 03/04/2024 John Bacus De Jesus, Esq. Bar No. 0111446 Anthony Joseph Maniscalco, Esq. Bar No. 548707 Giuseppe Cataudella, Esq. Bar No. 088976 Jacqueline Elizabeth Ligas, Esq. Bar No. 030009 Jessica Montes, Esq. Bar No. 47522 Jorg Menriv Rivera, Esq. Bar No. 0779571 Juliana Rodriguez, Esq. Bar No. 105514 Kali Ann Cilli, Esq. Bar No. 1038142 Luis Dionicio- Elera, Esq. Bar No. 1022109 Shayna Lynn Singer, Esq. Bar No. 821101 Attorneys for Plaintiff Portfolio Recovery Associates, LLC 120 Corporate Blvd Norfolk, VA 23502 Phone: 866/428-8102 www.PRApay.com LitigationService@Portfoliorecovery.com

Florida\_RA@portfoliorecovery.com

1071947





4500 Munson St NW Canton OH 44718, U.S.

### **BILL of SALE**

# PRA (S2FSPRMS) – PSCC 180MP – April 2022

IC\_S2FSPRMS\_DMPLA\_DebtManager-20220424153426954227000-62401 IC\_S2FSPRMS\_DMPLA\_DebtManager-20220421085549891961000-61381

For value received and in further consideration of the mutual covenants and conditions set forth in the Forward Flow Accounts Purchase Agreement (the "Agreement"), dated as of this 14<sup>th</sup> day of February, 2022 by and between Synchrony Bank, formerly known as GE Capital Retail Bank; RFS Holding, L.L.C.; Synchrony Card Funding, LLC; and Retail Finance Credit Services, LLC., ("Sellers") and Portfolio Recovery Associates, LLC ("Buyer"), Sellers hereby transfer, sell, convey, grant, and deliver to Buyer, its successors and assigns, without recourse except as set forth in the Agreement, to the extent of its ownership, the Accounts as set forth in the Notification Files (as defined in the Agreement), delivered by Sellers to Buyer on or about 17<sup>th</sup> of April 2022, and as further described in the Agreement.

Synchrony Bank

By: Lypne Fisher (Apr 29, 2022 16:10 EDT)

Lynne Fisher

Title: SVP Recovery Operations

RFS Holding LLC

By: Lypy & Fisher (Apr 29, 2022 16:10 EDT)

Lynne Fisher

Title: Duly Authorized Signatory

Synchrony Card Funding, LLC

By: Lypne Fisher (Apr 29, 2022 16:10 EDT)

Lynne Fisher

Title: Duly Authorized Signatory

Retail Finance Credit Services, LLC

By: Lypry Fisher (Apr 29, 2022 16:10 EDT)

Lynne Fisher

Title: Vice President



# Sale File: S2FSPRMS\_041822.XLSX

| CNSMR_ACCNT_CRDTR_R<br>FRNC_ID_TXT | *******8746      |
|------------------------------------|------------------|
| GERMSACCTNUM                       |                  |
| CNSMR_ACCNT_ID                     | ******5945       |
| CNSMR ID                           | *******1110      |
| CNSMR NM FRST TXT                  | NATASHA          |
| CNSMR NM LST TXT                   | PEREZ            |
| CNSMR IDNTFR SSN TXT               | ******           |
| CNSMR BRTH DT                      | **/**/1996       |
| CNSMR_ADDRSS_LN_1_TX               | 4522 HIGHLAND CT |
| CNSMR_ADDRSS_LN_2_TX<br>T          |                  |
| CNSMR_ADDRSS_LN_3_TX<br>T          |                  |
| CNSMR_ADDRSS_CITY_TX<br>T          | JACKSONVILLE     |
| CNSMR ADDRSS ST TXT                | FL               |
| CNSMR_ADDRSS_PSTL_CD<br>TXT        | 322072153        |
| RMSHOMEPHN                         |                  |
| RMSWORKPHN                         | ******           |
| LANGIND                            | ENG              |
| EMAIL-ADDRESS                      | ******           |
| CNSMR_ACCNT_OWNRSHP<br>TYP_CD      |                  |
| CNSMR_NM_FRST_TXT_CM<br>KR         |                  |
| CNSMR_NM_LST_TXT_CMK R             |                  |
| CNSMR_IDNTFR_SSN_TXT_<br>CMKR      |                  |
| CNSMR_ADDRSS_LN_1_TX<br>T_CMKR     |                  |
| CNSMR_ADDRSS_LN_2_TX<br>T_CMKR     |                  |
| CNSMR_ADDRSS_LN_3_TX<br>T_CMKR     |                  |
| CNSMR_ADDRSS_CITY_TX<br>T_CMKR     |                  |
| CNSMR_ADDRSS_ST_TXT_<br>CMKR       |                  |
| CNSMR_ADDRSS_PSTL_CD<br>TXT_CMKR   |                  |
| UDEFOPENDATE                       | 2/1/2018         |
| CNSMR_ACCNT_CHRG_OF F_DT           | 3/15/2021        |
| CNSMR_ACCNT_LST_PYMN<br>T_DTTM     | 8/17/2020        |



# Sale File: S2FSPRMS\_041822.XLSX

| CNSMR_ACCNT_LST_PYMN<br>T_AMNT | \$82.00                           |
|--------------------------------|-----------------------------------|
| CNSMR_ACCNT_DLQNCY_<br>DT      | 9/16/2020                         |
| LOSS AMNT                      | \$1,852.99                        |
| INT_RATE                       | 0                                 |
| CURBAL                         | \$1,852.99                        |
| NET_PRINCIPAL                  | \$1,852.99                        |
| PRINC LOSS                     | \$846.57                          |
| ASSOC COSTS                    |                                   |
| ACCRD_INT                      | \$1,006.42                        |
| LSTPURCDATE                    | 5/31/2020                         |
| REFUDEFOFFICERCDE              | FNI592                            |
| OFF_DESC                       | American Signature Furn.          |
| BCLE                           | BK1181                            |
| BCLE DESC                      | Synchrony Bank                    |
| RMSJDGDATE                     |                                   |
| UDEFPOCBARDATE                 |                                   |
| REFUDEFBKCHAPTER               |                                   |
| UDEFBKCASENUM                  |                                   |
| UDEFDISCHGDATE                 |                                   |
| UDEFDISMISSDATE                |                                   |
| UDEFBKR341MTNGD                |                                   |
| UDEFBKFILEDATE                 |                                   |
| UDEFBKPOCDT                    |                                   |
| REFUDEFCOSTCTR                 | CFAM                              |
| UDEFCHGOFFRSN                  | UNPY                              |
| STATUS                         | SOLDFNDG                          |
| SYSDESC                        | Sold, Funding (RECOVERY TAG TYPE) |
| REFUDEFBIZTYPE                 | RSF                               |
| BUYERCODE                      | S2FSPRMS                          |
| UDEFECOA                       | 1                                 |
| UDEFSALEDATE                   | 4/17/2022                         |
| UDEFBHSCORE                    | 000                               |

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