## FILED: MONTGOMERY COUNTY CLERK 01/03/2022 05:16 AM

NYSCEF DOC. NO. 1

#### **CONSUMER CREDIT TRANSACTION**

INDEX NO. EF2022-2 RECEIVED NYSCEF: 01/03/2022

Date Purchased:

SUPREME COURT OF THE STATE OF NEW YORK <u>COUNTY OF MONTGOMERY</u> X Crown Asset Management, LLC Plaintiff.

-against-

Valerie M Butler

Defendant(s).

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Index №

SUMMONS Plaintiff's Address: 3100 Breckenridge Blvd. Suite 725 Duluth GA 30096

The Basis of Venue is: CPLR SEC. 503(f). Defendants residence is in the County of MONTGOMERY.

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Defendant(s) Address:

DEF.#1 - 136 Koons Rd, Esperance NY 12066-2717

TO THE ABOVE NAMED DEFENDANT(S):

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer on the Plaintiff's Attorney(s) within 20 days after the service of this summons, exclusive of the day of service, or within 30 days after service is complete if this summons is not personally delivered to you within the State of New York; and in the case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

We are attorneys attempting to collect a debt. Any information obtained will be used for that purpose.

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Dated: December 21, 2021 Matter # 409830

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Evridike Kollis	Stephanie R. Vetch
🔀 Aksana Bondartseva	Joseph J. Cassotta
Scott Morris	Anthony Poulin
Stephen Einstein	🔲 Joseph G. Devine
Tromberg, Morris & Pou	llin, PLLC
Attorneys for the Plainti	ff
39 Broadway, Suite 1250	)
New York, N.Y. 10006	
(212) 267-3550	n see manaak waxaan manaar waxaal waxaal waxaa karaa karaa karaa karaa karaa karaa ka



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# SUPREME COURT OF THE STATE OF NEW YORKINDEX №:COUNTY OF MONTGOMERYCrown Asset Management, LLC

Plaintiff,

-against-

**COMPLAINT** 

Valerie M Butler

Defendant(s).

Plaintiff, by its undersigned attorneys, complaining of the Defendant(s), respectfully alleges that:

1. Plaintiff is an active foreign entity conducting business in the state of GA.

2. Upon information and belief, Defendant(s) reside or is employed in of the State of New York, County of MONTGOMERY; or that the Defendant(s) transacted business with within the jurisdiction and venue where this action is brought in person or through an agent and that the instant cause of action arose out of said transaction.

#### AS AND FOR A FIRST CAUSE OF ACTION

3. The Defendant(s) hereto entered into a Credit Agreement with Plaintiff's predecessor in interest, First National Bank of Omaha, bearing account #XXXXXXXX1788 who charged off the debt on 06/30/2020.

4. Upon information and belief, Plaintiff's predecessor in interest duly performed all conditions on its part under the agreement.

5. The Plaintiff thereafter took by assignment all the rights, title and interest to receive the monies due pursuant to and in accordance with the said agreement and is the legal assignee of the original creditor.

6. Upon information and belief, Plaintiff advised Defendant, in writing, of said balance due and demanding payment. No payment has been forthcoming.

7. Defendant(s) defaulted in payment and pursuant to the terms of the agreement now owe a balance of 1,372.59 as of 6/30/2020, no part of which has been paid despite due demand therefore.

AS AND FOR A SECOND CAUSE OF ACTION

8. That heretofore, upon information and belief, Plaintiff's predecessor in interest rendered to Defendant(s) monthly, full and truth accounts of the indebtedness owing by the Defendant(s) as a result of the above Agreement, in an amount as hereinabove set forth, which account statements were delivered to and accepted without objection by the Defendant(s) resulting in an account stated in the sum of 1,372.59 as of 6/30/2020, no part of which has been paid despite due demand therefore.

WHEREFORE, Plaintiff demands judgment against Defendant(s) in the sum of \$1,372.59, plus costs and disbursements.

<u>CERTIFICATION</u>: Deponent is an attorney associated with Tromberg, Morris & Poulin, PLLC Deponent certifies that, to the best of their knowledge, information and belief, formed after an inquiry reasonable under the circumstances, the presentation of the paper or the contentions therein are not frivolous as defined in section 130-1.1(c) of the Chief Administrative Judge, and an initiating pleading, the matter was not obtained through illegal conduct, and the matter was not obtained in violation of Part 1200. Rule 4.5 of this Title. Affirmed this 21st day of December, 2021.

Matter # 409830

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Evridike Kollis

 Aksana Bondartseva

 Scott Morris

 Stephen Einstein

Stephanie R. VetchJoseph J. CassottaAnthony PoulinJoseph G. Devine

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		<b>ERK 01/03/2022</b> ex No.	Veer	INDEX NO. EF2022-2	
NYSCEF DOC. NO.	SUPREME CO	OURT OF THE STATE	OF NEW YOR	RECEIVED NYSCEF: 01/03/2022	
	Crown Asset Management, LLC Plaintiff -against-				
_		Valerie M Butler	Defendant(s)	)	
	SUMMONS AND VERIFIED COMPLAINT				
	Evridike		1-a) Stephanie R. Vetch Ioseph J. Cassotta		
_	Scott M	n Einstein	Anthony Poulin Ioseph G. Devine		
	LAW OFFICE OF TROMBERG, MORRIS & POULIN, PLLC Attorney(s) for Plaintiff Office and Post Office Address 39 Broadway, Suite 1250 New York, New York 10006 (212) 267-3550 Fax (212) 227-9656				
	Service of a copy of the within is hereby admitted. Dated, Attorney(s) for Plaintiff(s)				
=	Sir: Please take no	tice			
Т	<u>NOTICE OF ENTR</u> hat within is a (certified) f the within named court	true copy of a duly en	tered in the offic	e of the clerk	
S	<u>NOTICE OF SETTLEMENT</u> That an order of which the within is a true copy of a Settlement to the HON Presented for one of the judges				
C	f the within named court, a n the day of 20 ated,				
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