FILED: SCHENECTADY COUNTY CLERK 09/28/2023 08:31 AM

INDEX NO. 2023-1655

NYSCEF DOC. NO. 1

RECEIVED NYSCEF: 09/28/2023

SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF SCHENECTADY

COMMUNITY CARE PHYSICIANS, P.C. 711 TROY SCHENECTDY RD

LATHAM, NY 12110

Plaintiff,

SUMMONS

riairiuiii,

Index No.
Date Filed

CHRISTINE ZAPOTOCKI

Defendant(s).

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 plaintiffs attorneys within twenty days after service of this summons, exclusive of the day of service, or thirty days after service is completed if this summons is not personally delivered to you within the State of New York. Upon your failure to answer, a judgment will be entered against you by default for the relief demanded in the complaint.

The basis of venue is that the defendant reside(s) in the County of SCHENECTADY.

Dated:

June 20, 2023

Melissa M. Tobrocke
ORDD LAW, LLP
Attorneys for the Plaintiff
19 Executive Park Dr.
Clifton Park, New York 12065

(518) 383-4876

FOR PROCESS SERVER ONLY

DEFENDANT 1:

DEFENDANT 2:

CHRISTINE ZAPOTOCKI 2213 THOUSAND ACRES RD

DELANSON, NY 12053

NOTICE: WE ARE A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT AND ANY



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| SUPREME | COURT | OF THE | STATE | OF | NEW | YORK |
|-----------------------|-------|---------------|-------|----|-----|------|
| COUNTY OF SCHENECTADY | | | | | | |

COMMUNITY CARE PHYSICIANS, P.C.

Plaintiff,

VERIFIED COMPLAINT

Index No.

CHRISTINE ZAPOTOCKI

Defendant(s).

The plaintiff alleges:

- 1. The Plaintiff is a domestic corporation authorized to establish and maintain a medical practice to render medical and physician services.
- 2. Upon information and belief, defendant resides, or the transaction took place in the county in which this action was commenced and the defendant resides at the address set forth above, such address being the address of the defendant last known to the plaintiff and/or the address provided to the plaintiff by the defendant at the time services were rendered.
- 3. From August 10, 2021 to October 3, 2022, the plaintiff, at the express or implied request of the defendant, rendered medical services to the defendant, or individuals for whom the defendant is financially responsible.
- 4. Upon information and belief, the plaintiff sent the defendant numerous billing statements to the address provided at the time services were rendered or the last known address and before the account came to counsel's office for collections. Additionally, counsel's office also sent written correspondence to the defendant, at the last known address or the address provided to the plaintiff, and before commencing this lawsuit. Although due demand has been made, the defendant has failed to pay the full amount due for services rendered by the plaintiff.
- The reasonable value and agreed price of such services that remains unpaid is \$1,043.19.

WHEREFORE, the plaintiff demands judgment against the defendant in the sum of \$1,043.19 with interest from October 3, 2022, plus the costs and disbursements of the action and for such other, further or different relief as to this Court may deem just.

DATED:

June 20, 2023

Melissa M. Tobrocke

ORDD LAW, LLP

Attorneys for the Plaintiff 19 Executive Park Dr.

Clifton Park, New York 12065

(518) 383-4876

NOTICE: WE ARE A REST COLLECTOR ATTEMPTING TO COLLECT A REST AND ANY



CLERK

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SVC-H-3 (81)

SUPREME COURT OF THE STATE OF NEW YORK

SS. :

COUNTY OF SCHENECTADY

COMMUNITY CARE PHYSICIANS, P.C. 711 TROY SCHENECTDY RD

LATHAM, NY 12110

Plaintiff,

VERIFICATION

CHRISTINE ZAPOTOCKI

Defendant(s).

The undersigned, being duly sworn, deposes and says:

- 1. I am an officer or agent of the plaintiff, which is a domestic corporation authorized to establish and maintain a medical practice to render medical and physician services.
- 2. I have read the foregoing complaint and the same is true to my knowledge, except those matters alleged upon information and belief, and as to those matters, I believe it to be true.
- 3. The grounds of my belief as to all matters not stated upon my knowledge are the plaintiff's business records.

TERRI BOOMHOWER

PATIENT RELATIONS MANAGER

Sworn to before me this

Notary #ublic

Mary Jo Teresco

1005179720/666262630

