

**CONSUMER CREDIT TRANSACTION**

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF SCHOHARIE**

**Purchased:**

**Index No.**

Cavalry SPV I, LLC, as assignee of  
Citibank, N.A.

**SUMMONS**

, Plaintiff

Basis of venue is the residence of  
defendant(s) and/or the county  
where the transaction took place

-against-

WILLIAM J BROWN  
1481 Clauverwie Rd  
Middleburgh NY 12122-4704

, Defendant(s).

To the above named Defendant(s):

**YOU ARE HEREBY SUMMONED** and required to serve upon plaintiff's attorney an answer to the complaint in this action within twenty days after the service of this summons, exclusive of the day of service, or within thirty days after service is complete if this summons is not personally delivered to you within the State of New York. In case of your failure to answer, judgment will be taken against you by default for the relief demanded in the complaint.

Plaintiff's address: 500 Summit Lake Dr., Suite 400, Valhalla, NY 10595

Defendant's address: 1481 Clauverwie Rd Middleburgh NY 12122-4704

Dated: August 26, 2020

Grzegorz Owsiany, Esq.  
Portnoy Schneck, L.L.C.  
500 Summit Lake Drive Suite 4A  
Valhalla, NY 10595  
Phone: 888/841-6574  
Attorney for Plaintiff  
File No. L2001003

**NOTE:** The law provides that:

1. If this summons is served by its delivery to you personally, you must appear and answer within TWENTY (20) days after such service; or
2. If this summons is served by its delivery to any person other than you personally, or by publication, or by any means other than personal delivery to you, you are allowed THIRTY (30) days after the proof of service thereof is filed with the Clerk of the this Court within which to appear and answer.

**Disclosure**

You are hereby advised, pursuant to the Fair Debt Collection Practices Act, that this firm is deemed to be a debt collector attempting to collect a debt and any information obtained will be used for that purpose.  
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**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF SCHOHARIE**

**Index No.**

**COMPLAINT**

Cavalry SPV I, LLC, as assignee of  
Citibank, N.A.

, Plaintiff

-against-

WILLIAM J BROWN

, Defendant(s).

Plaintiff, by and through its attorney, Portnoy Schneck, L.L.C.,  
complaining of the Defendant(s) alleges:

1. That at all times hereinafter mentioned, Plaintiff, CAVALRY SPV I, LLC,  
is a limited liability company with a place of business in the State of New  
York.

2. Plaintiff, by purchase and assignment, acquired from Citibank, N.A. ,  
original creditor all right, title, and interest in the defaulted account,  
account number \*\*\*\*\*4701, of Defendant(s), WILLIAM J BROWN.

**AND FOR A FIRST CAUSE OF ACTION**

3: Plaintiff, through assignment, is the lawful owner of a consumer credit  
agreement entered into by defendant(s).

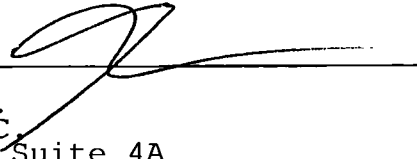
4: Defendant(s) did breach the aforesaid consumer credit agreement and  
Plaintiff seeks the sum of \$3,668.16. Payment has been demanded by  
Plaintiff but has not been made.

**AND FOR A SECOND CAUSE OF ACTION**

5: Plaintiff seeks from Defendant(s) the sum of \$3,668.16, upon an account  
stated between them, did promise to pay Plaintiff said sum upon demand.  
Payment has been demanded by Plaintiff and has not been made.

**WHEREFORE**, Plaintiff demands Judgment against Defendant(s) for the sum of  
\$3,668.16, with costs and disbursements of this action and interest  
thereon.

Dated: August 26, 2020

  
Grzegorz Owsiany, Esq.  
Portnoy Schneck, L.L.C.  
500 Summit Lake Drive Suite 4A  
Valhalla, NY 10595  
Phone: 888/841-6574  
Attorney for Plaintiff  
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