

CAUSE NO. CL-24-1450-A

Credit Corp Solutions Inc.
Plaintiff,

vs.

ARGELIA LOPEZ
Defendant.

§ IN THE COUNTY COURT
§
§
§ AT LAW NO. ____
§
§ OF HIDALGO COUNTY, TEXAS

PLAINTIFF'S ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Credit Corp Solutions Inc. ("Plaintiff"), a corporation, and for cause of action against Defendant Argelia Lopez, would show unto the Court as follows:

Discovery Control Plan

1. Discovery is to be conducted under Level 1 of Rule 190 of the Texas Rules of Civil Procedure.
2. Plaintiff seeks only monetary relief of \$250,000 or less, excluding interest, statutory or punitive damages and penalties, and attorney fees and costs.

Nature of Case

3. Plaintiff seeks a recovery for damages arising from Defendant Argelia Lopez's default on a Credit Account, which Defendant used or authorized to be used and for which Defendant became obligated to repay. Plaintiff sues herein for suit on debt/account stated. Plaintiff seeks a money judgment against the Defendant.

Parties

4. Plaintiff, Credit Corp Solutions Inc., is a corporation .
5. Defendant Argelia Lopez is an adult individual upon whom service of citation may be had at Defendant's residence which is located at 133 W Blue Jay Ave, Pharr, TX 78577 or where they may be found.

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Venue

6. Venue is proper in Hidalgo County pursuant to Section 15.002(a)(2) of the Texas Civil Practice and Remedies Code because it is the county of residence for one or more of the defendants at the time the cause of action accrued.

Facts

7. In the usual course of business, Synchrony Bank advanced dollar amounts on a Credit Account, account number XXXXXXXXXXXXX9327, which Defendant used or authorized to be used for the purchases of goods, merchandise, services or for cash advances and for which Defendant became bound to repay Synchrony Bank for all amounts thereby advanced (hereinafter, the "Account").

8. The Defendant ceased making the required payments on the Account, thereby creating a default. Ultimately, the Account was charged-off on February 17, 2021. As of the filing of this lawsuit, there remains an unpaid balance of \$2,340.64.

9. Plaintiff is the true party in interest to the Contract in that it is the assignee, owner and/or beneficiary of all rights pursuant to an assignment of the Contract to Plaintiff.

10. On or about January 29, 2024, Plaintiff sent a letter to Defendant demanding payment in full of the Account (the "Demand Letter"); however, despite delivery of the Demand Letter, the Account has not been paid. There continues to be owed by Defendant to Plaintiff an unpaid balance of \$2,340.64.

COUNT I - Suit on Debt / Account Stated

11. Paragraphs 1 through 10 are incorporated by reference.

12. Plaintiff is the owner and beneficiary of all claims related to the Account. In accordance with federal regulations, Synchrony Bank sent monthly periodic statements for the Account to the Defendant. Based upon Plaintiff's records, there are no unresolved billing disputes related to the Account and the amount that is due and owing on the Account is \$2,340.64; said amount being just and true after all lawful offsets, payments and credits have been allowed.

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13. Plaintiff is entitled to recover on the Account because (i) transactions between Plaintiff and the Defendant gave rise to an indebtedness, (ii) there existed an agreement between the Plaintiff and the Defendant which established the amount that was due to Plaintiff, and (iii) the Defendant promised to pay Plaintiff on the debt which was incurred, but failed to do so.

14. Plaintiff has presented its claim to Defendant for payment, but Defendant has failed and refused to pay the amount owed.

Waiver of Attorneys Fees

15. Plaintiff expressly waives its right, if any, to recover its attorneys fees in this matter.

Conditions Precedent

16. All conditions precedent to Plaintiff's right of recovery have been fulfilled.

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Prayer

WHEREFORE, Plaintiff Credit Corp Solutions Inc. prays that Defendant Argelia Lopez be cited to appear and answer herein, that this Court set this matter for hearing, and that upon final hearing hereof, Plaintiff have judgment against the Defendant as set forth herein:

- a. Damages in the amount of \$2,340.64,
- b. Cost of Court, and
- c. For such other relief to which Plaintiff may show itself entitled.

Respectfully submitted,

SCOTT & ASSOCIATES, P.C.,

/s/ Tarria Simmons Barker

Digitally signed by Tarria Simmons Barker
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Date: 4/2/2024 1:52:55 PM

Tarria Simmons Barker

SBN 24128417

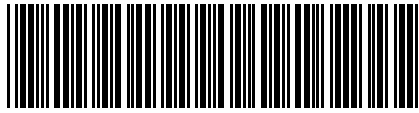
P. O. Box 115220
Carrollton, Texas 75011
Telephone: (214) 234-8456
Facsimile: (214) 234-8454
Courts@scott-pc.com

ATTORNEYS FOR PLAINTIFF



700 Highlander Blvd #200, Arlington, TX 76015
Phone: 214-920-9688

PARTNER
ABC E-File Texas
E-FILE ONLY, Dallas, TX 75220



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In re: Argelia Lopez
0128894-071

Clerk of the County Court
Hidalgo County, Texas
100 N Clossner- 1st Floor
Edinburg, TX 78539

**ORIGINAL PETITION – CIVIL CASE
COUNTY COURT**

RE: Credit Corp Solutions Inc. vs. Argelia Lopez; TX County Court for Hidalgo County

Dear Sir or Madam:

Enclosed please find the following documents:

- Cover letter
- Original Petition (Original plus copies)

Instructions:

- Please file the Original Petition
- Please issue a separate Citation for each defendant for service by a private process server

The Citation(s) should be issued to:

Argelia Lopez
133 W Blue Jay Ave
Pharr, TX 78577

- Please return this coversheet, the original Citation, and a filed-stamped copy of the Original Petition to ABC Legal by:

- Mail to ABC Legal at 700 Highlander Blvd Ste 200, Arlington TX 76015
- Hold for pickup by local ABC courier
- Email to mjscourts@abclegal.com

Thank you in advance for your assistance!
ABC Legal Services

**** Please do not throw me away ****
Return this page with the citation and petition
This barcode is very important to us



In re: Argelia L
0128894-

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