

TROUTMAN PEPPER HAMILTON SANDERS LLP
Stephen J. Steinlight, Esq.
New Jersey Bar ID No. 028852001
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Attorney for Defendant
Estate Information Services, LLC
d/b/a EIS Management

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ALEXANDRIA SMITH

Plaintiff.

v.

ESTATE INFORMATION SERVICES,
LLC
D/B/A EIS MANAGEMENT

Defendant.

(Electronically Filed)

Civil Action No. 2:24-cv-08072

NOTICE OF REMOVAL

State Court Docket No: MID-L-003645-
24

I. INTRODUCTION

Without waiving any defenses, Defendant Estate Information Services, LLC d/b/a EIS Management (“Truist”), by and through its counsel, Troutman Pepper Hamilton Sanders LLP, and pursuant to 28 U.S.C. § 1441, hereby removes this

action from the Superior Court of New Jersey, Law Division, Middlesex County, to the United States District Court for the District of New Jersey.

1. Pursuant to Rule 10.1(a) of the Local Civil Rules of this District Court, the addresses of the named parties are as follows:

a. As alleged in the complaint (the “Complaint”) in the State Court Action, the plaintiff in this action, Alexandria Smith (“Plaintiff”), is an individual who resides in the City of Carteret, County of Middlesex, State of New Jersey.

b. Plaintiff is represented by Ryan Gentile, Esq., at the following address:

Law Offices of Gus Michael Farinella PC
185 Cedar Lane – Ste. U5,
Teaneck, NJ 07666
rlg@lawgmf.com

c. The defendant in this action is Estate Information Services, LLC d/b/a EIS Management (“EIS” or “Defendant”). The Complaint alleges “EIS is a limited liability company with its principal place of business located at 670 Morrison Road, Suite 300 Gahanna, OH 43230.”

d. EIS is represented by Stephen J. Steinlight, Esq., at the following address:

TROUTMAN PEPPER HAMILTON SANDERS LLP

875 Third Avenue
New York, NY 10022
Telephone: (212) 704-6008
stephen.steinlight@troutman.com

II. REMOVAL OF THE STATE COURT ACTION TO THIS DISTRICT COURT IS PROCEDURALLY PROPER

2. On or about June 21, 2024, Plaintiff Alexandria Smith (“Plaintiff”) filed a complaint against EIS in the Superior Court of New Jersey, Law Division, Middlesex County where it was given Docket No. MID-L-003645-24 (the “State Court Action”). A copy of the Summons and Complaint is attached hereto as **Exhibit A.**

3. The documents attached hereto as Exhibit A constitute all process, pleadings and orders EIS has been served with concerning the State Court Action.

4. Plaintiff served a Summons and Complaint upon EIS, via its registered agent for service of process, on June 27, 2024. This notice of removal is filed within 30 days of receipt of the Complaint and is therefore timely under 28 U.S.C. §1446(b).

5. Plaintiff asserts claims against EIS arising under the Fair Debt Collection Practices Act, 47 § U.S.C. 227 *et seq.* (“FDCPA”).

6. EIS denies the allegations in the Complaint, denies that Plaintiff has stated any claim for which relief may be granted, and denies that Plaintiff has been damaged in any manner. Nevertheless, assuming for jurisdictional purposes only

that Plaintiff's claims are valid, Plaintiff could have originally filed the Complaint in this Court under federal question jurisdiction because Plaintiff asserts violations of federal law, namely the FDCPA.

7. This Notice of Removal is being filed within one (1) year of the date of commencement of the action for removal purposes. Accordingly, this Notice of Removal is timely pursuant to 28 U.S.C. § 1446(b).

8. Because the Superior Court of New Jersey, Law Division, Middlesex County lies in the District of New Jersey, this Court is the appropriate venue for removal. See 28 U.S.C. §§ 110 and 1441(a).

9. Pursuant to 28 U.S.C. § 1446(d), written notice of the filing of this Notice of Removal—by a document titled “Notice of Filing Notice of Removal”—will be promptly filed with the Clerk of the Superior Court of New Jersey, Law Division, Middlesex County and served on Plaintiff's counsel of record, as specified on page 1 of this Notice of Removal. A copy, without exhibits, is attached hereto as **Exhibit B**.

III. REMOVAL IS PROPER UNDER FEDERAL QUESTION JURISDICTION

10. Plaintiff alleges that EIS violated the FDCPA by way of a letter attached as Exhibit A to the Complaint. Compl. ¶ 37. This Court has original jurisdiction over Plaintiff's FDCPA claims pursuant to 28 U.S.C. § 1331, which states that jurisdiction is appropriately exercised over “all civil actions arising under

the Constitution, laws, or treaties of the United States.” Thus, removal is proper. 28 U.S.C. § 1441(a) (“any civil action brought in a State court of which the district courts of the United states have original jurisdiction, may be removed”).

IV. RESERVATION OF RIGHTS

11. Removal of this case to the United States District Court for the District of New Jersey does not constitute a waiver by EIS of the right to seek dismissal of this action, and EIS removes this action to this District Court without waiver of any defenses, procedural or substantive, that may be available.

V. CONCLUSION

WHEREFORE, Defendant Estate Information Services, LLC hereby removes this action from the Superior Court of New Jersey, Law Division, Middlesex County to the United States District Court for the District of New Jersey.

D.N.J. LOCAL CIVIL RULE 11.2 STATEMENT

Pursuant to Local Rule 11.2, the undersigned counsel, on behalf of Defendant Estate Information Services, LLC (“EIS”) certifies that the matter in controversy is not the subject of any other action pending in any court, or of any pending arbitration or administrative proceeding.

Dated: July 26, 2024

Respectfully submitted,

**TROUTMAN PEPPER HAMILTON
SANDERS LLP**

By: /s/ Stephen J. Steinlight

Stephen J. Steinlight, Esq.

New Jersey Bar ID No. 028852001

TROUTMAN PEPPER HAMILTON SANDERS
LLP

875 Third Avenue

New York, NY 10022

Telephone: (212) 704-6008

Email: stephen.steinlight@troutman.com

Attorney for Defendant

Estate Information Services, LLC

d/b/a EIS Management

CERTIFICATE OF SERVICE

I hereby certify that on July 26, 2024, the foregoing was filed electronically. The parties may access this filing through the Court's system. A copy was also served via email and regular mail on the following:

Ryan Gentile
The Law Offices of Gus Michael Farinella, PC
185 Cedar Lane – Suite U5
Teaneck, NJ 07666
rlg@lawgmf.com

/s/ Stephen J. Steinlight

EXHIBIT A

SUMMONS

Attorney(s) Law Offices of Gus Michael Farinella PC
Office Address 185 Cedar Lane - Suite U5
Town, State, Zip Code Teaneck, NJ 07666

Telephone Number 201-873-7675
Attorney(s) for Plaintiff Alexandria Smith
Alexandria Smith

Plaintiff(s)

vs.

ESTATE INFORMATION SERVICES, LLC

d/b/a EIS Management

Defendant(s)

**Superior Court of
New Jersey**

Middlesex County
Law Division
Docket No: MID-L-003645-24

**CIVIL ACTION
SUMMONS**

From The State of New Jersey To The Defendant(s) Named Above:

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at <http://www.njcourts.gov>.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$175.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at <http://www.njcourts.gov>.

/s/ Michelle M. Smith

Clerk of the Superior Court

DATED: 01/30/2024

Name of Defendant to Be Served: ESTATE INFORMATION SERVICES, LLC d/b/a EIS Management

Address of Defendant to Be Served: c/o Corporation Service Company Princeton South Corporate Center
100 Charles Ewing Blvd - Suite 160
Ewing, NJ 08628

Ryan Gentile (NJ-ID 032202007)
LAW OFFICES OF GUS MICHAEL FARINELLA, PC
185 Cedar Lane – Suite U5
Teaneck, NJ 07666
Tel: (201) 873-7675
rlg@lawgmf.com
Attorneys for Plaintiff, Alexandria Smith
on behalf of herself and all others similarly situated

ALEXANDRIA SMITH, *on behalf of*
herself and all others similarly situated

Plaintiff

v.

ESTATE INFORMATION SERVICES,
LLC d/b/a EIS Management

Defendant

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
MIDDLESEX COUNTY

Docket No.

Civil Action

**CLASS ACTION COMPLAINT
AND JURY DEMAND**

Plaintiff, by and through her counsel, Ryan Gentile, Esq., as and for her complaint against Defendant, on behalf of herself and pursuant to Rule 4:32 all others similarly situated, alleges as follows:

INTRODUCTION

1. Plaintiff, on her own behalf and on behalf of the class she seeks to represent, brings this action to secure redress for the debt collection practices utilized by the Defendant, ESTATE INFORMATION SERVICES, LLC d/b/a EIS Management (“EIS”) in connection with its attempts to collect alleged debts from the Plaintiff and others similarly situated.
2. Plaintiff alleges that the Defendant’s collection practices violated the Fair Debt Collection Practices Act, 15 U.S.C. §1692 *et seq.* (“FDCPA”).

3. The FDCPA broadly prohibits conduct which harasses, oppresses or abuses any debtor; any false, deceptive or misleading statements made in connection with the collection of a debt; unfair or unconscionable collection methods; and requires certain disclosures. *See* 15 U.S.C. §§1692d, 1692e, 1692f and 1692g.
4. The FDCPA is generally characterized as a “strict liability” statute because “it imposes liability without proof of an intentional violation.” Glover v. FDIC, 698 F.3d 139 (3d Cir. 2012) (citing Allen ex rel. Martin v. LaSalle Bank, N.A., 629 F.3d 364, 368 & n. 7 (3d Cir. 2011)).

JURISDICTION AND VENUE

5. This Court has jurisdiction over Plaintiff’s FDCPA claim pursuant to 15 U.S.C. § 1692k(d).
6. Venue and personal jurisdiction in this County are proper because:
 - i. The acts giving rise to this lawsuit occurred within this County;
 - ii. Defendant does business within this County; and
 - iii. Plaintiff resides within this County.

PARTIES

7. Plaintiff, Alexandria Smith, is an individual natural person who at all relevant times resided in the City of Carteret, County of Middlesex, State of New Jersey.
8. Plaintiff is a “consumer” as that term is defined by 15 U.S.C. §1692a(3).
9. EIS is a limited liability company with its principal place of business located at 670 Morrison Road – Suite 300 Gahanna, OH 43230.
10. The principal purpose of EIS is the collection of debts using the mail and telephone.

11. EIS regularly collects or attempts to collect, directly or indirectly, debts owed or due or asserted to be owed or due another.
12. EIS collects and attempts to collect debts owed or due another that were incurred or alleged to have been incurred for personal, family or household purposes on behalf of creditors using the United States Postal Service and/or the telephone.
13. EIS is a “debt collector” as that term is defined by 15 U.S.C. § 1692a(6).

FACTS

14. Sometime prior to December 31, 2022, Plaintiff allegedly incurred a financial obligation to Discover Bank (“Discover”) related to a personal credit card with an account number ending in “2206” (the “Debt”).
15. The Debt arose out of a transaction in which the money, property, insurance or services which were the subject of the transaction were primarily for personal, family or household purposes, namely fees emanating from a personal credit card account in Plaintiff’s name that was issued by Discover.
16. The Debt arose out of a credit card account which Plaintiff opened for her personal use.
17. Plaintiff’s credit card account that was issued by Discover was neither opened nor used by Plaintiff for business purposes.
18. Plaintiff’s personal credit card account Debt to Discover is a “debt” as defined by 15 U.S.C. §1692a(5).
19. Defendant contends that the Debt is past-due and in default.
20. At the time the Debt was referred to EIS for collection, the Debt was past-due.
21. At all times relevant hereto, Defendant acted in an attempt to collect the Debt.

22. On or about June 11, 2024, EIS mailed or caused to be mailed a letter (the "Letter") to Plaintiff. (Annexed and attached hereto as Exhibit A is a true copy of the Letter dated June 11, 2024 sent by EIS to Plaintiff, except the undersigned counsel has redacted the reference and account numbers and Plaintiff's street address to protect her privacy).
23. EIS mailed the Letter as a part of their efforts to collect the Debt.
24. Plaintiff received the Letter in the mail.
25. Plaintiff read the Letter upon receipt of the letter in the mail.
26. The Letter was sent in connection with the collection of the Debt.
27. The Letter seeks to collect the Debt.
28. The Letter states in relevant part, "EIS Management is a debt collector. We are trying to collect a debt..."
29. The Letter conveyed information regarding the Debt including an amount allegedly owed, EIS Reference Number, and a demand for payment.
30. The Letter attached as Exhibit A is a "communication" as that term is defined by 15 U.S.C. §1692a(2).
31. The Letter states in relevant part:

As of December 31, 2022, amount owed:	\$7,981.48
Between December 31, 2022, and today:	
This amount in interest was charged:	+ \$0.00
This amount in fees was charged:	+ \$0.00
This amount was paid or credited toward the debt:	- \$-173.00
Total amount of debt now:	\$7,981.48

32. The Letter attached as Exhibit A is a computer-generated form letter.
33. EIS's debt collection practice is largely automated and utilizes standardized form letters.
34. On information and belief, the Letter attached as Exhibit A is a mass-produced, computer-generated form letter that is prepared by EIS and mailed to consumers in the State of New Jersey, such as Plaintiff, from whom they are attempting to collect a debt.
35. Defendant used the same procedures they used in sending the Letter attached as Exhibit A when sending the same and/or similar letters to other New Jersey consumers.

CLAIMS FOR RELIEF

COUNT I

VIOLATIONS OF THE FAIR DEBT COLLECTION PRACTICES ACT

36. Plaintiff incorporates by reference all the above paragraphs as though fully stated herein.
37. In sending the Letter attached as Exhibit A, Defendant violated 15 U.S.C. §§1692, 1692e, 1692e(2)(A), 1692e(10), 1692g, 1692g(a)(1).
38. 15 U.S.C. §1692e provides:

§1692e. False or Misleading Representations

A debt collector may not use any false, deceptive, or misleading representation or means in connection with the collection of any debt. Without limiting the general application of the foregoing, the following conduct is a violation of this section:

(2) The false representation of --

(A) the character, amount, or legal status of any debt;

(10) The use of any false representation or deceptive means to collect or attempt to collect any debt or to obtain information concerning a consumer

39. 15 U.S.C. §1692g provides:

(a) Notice of debt; contents

Within five days after the initial communication with a consumer in connection with the

collection of any debt, a debt collector shall, unless the following information is contained in the initial communication or the consumer has paid the debt, send the consumer a written notice containing

(1) the amount of the debt

40. EIS violated §1692g(a)(1) because its Letter attached as Exhibit A does not effectively convey the amount of the Debt allegedly owed by Plaintiff. The financial information listed in the Letter is inconsistent and illogical. The Plaintiff, as would any least sophisticated consumer, was unable to understand from the Letter the amount of the debt EIS alleged that she owed. The figures listed in the Letter are inconsistent and confusing because the amount listed as owing as of December 31, 2022 (\$7,981.48) plus the interest accrued since December 31, 2022 (\$0.00), plus the fees charged after December 31, 2022 (\$0.00), minus the amount paid or credited since December 31, 2022 (\$173) does not add up to the “total amount of the debt now” listed in the Letter of \$7,981.48. Simply put, a debt that was \$7,981.48 and incurred \$0 in interest and fees and was paid or credited \$173 towards cannot possibly have a current balance of \$7,981.48. Rather, based on those numbers, the balance due would be \$7,808.48. Therefore, EIS violated §1692g(a)(1) by failing to accurately and clearly state the amount of the Debt the Plaintiff allegedly owed in its Letter.

41. In the alternative, even if the “Total amount of the debt now:” of \$7,981.48 is correct, the Letter still violates §1692g(a)(1) because “even if a debt collector accurately conveys the required information, a consumer may state a claim if she successfully alleges that the least sophisticated consumer would inaccurately interpret the message.” See Carlin v. Davidson Fink LLP, 852 F.3d 207, 2016 (2d Cir. 2017). In this matter, any consumer, let alone a least sophisticated consumer, would inaccurately interpret the Letter because it

contains two distinct amounts that could allegedly be owed, one of which must be false.

Either the Plaintiff owes the \$7,981.48 amount listed as the “Total amount of the debt now”, or they owe the \$7,808.48 amount listed in the breakdown of the Debt ($\$7,981.48 + \$0 + \$0 = \$7,981.48 - 173 = \$7,808.48$).

42. The Letter attached as Exhibit A violates § 1692e(2)(A) because it makes a false representation of the amount of the Debt. Specifically, either the Letter makes a false representation that the “Total amount of the debt now” is \$7,981.48 or the Letter makes a false representation that \$173 was paid or credited toward the Debt since December 31, 2022.

43. The Letter attached as Exhibit A violates § 1692e(10) because it is misleading and deceptive. The letter is misleading and deceptive because it has two possible meanings, one of which is untrue. Specifically, according to the Letter, either the Plaintiff owes \$7,981.48 or they owe \$7,808.48. One of the balances cannot be correct, and therefore the Letter violates §1692e(10).

44. Be reason thereof, Defendant is liable to Plaintiff and the proposed class for judgment that the Defendant’s conduct violated 15 U.S.C. §1692e and 15 U.S.C. §1692g and for statutory damages, costs, and attorneys’ fees pursuant to 15 U.S.C. §1692k.

CLASS ALLEGATIONS

45. Plaintiff incorporates by reference all the above paragraphs as though fully stated herein.

46. This action is brought as a class action. Plaintiff brings this action on behalf of herself and on behalf of all other persons similarly situated pursuant to Rule 4:32.

47. Subject to discovery and further investigation which may cause Plaintiff to modify, narrow or expand the following class definition at the time Plaintiff moves for class certification, Plaintiff seeks certification of a class initially defined as: (a) all individuals (b) with a New Jersey address (c) who were sent a Letter from EIS in a form materially identical or substantially similar to the Letter attached as Exhibit A to the Complaint (d) which was not returned as undeliverable (e) on or after a date one year prior to the filing of this action and on or before a date 20 days after the filing of this action (f) which letter included the alleged conduct and practices described herein.
48. The proposed class specifically excludes the United States of America, the state of New Jersey, counsel for the parties, the presiding Judge, and the Judges of the Superior Court of New Jersey, Appellate Courts and Supreme Court.
49. This action has been brought, and may properly be maintained, as a class action pursuant to the provisions of Rule 4:32 because there is a well-defined community interest in the litigation:
- i. **Numerosity**: Plaintiff is informed and believes and on that basis alleges that the class defined above is so numerous that joinder of all members would be impracticable. Defendant's conduct involves the sending of a form collection letter. Upon information and belief, there are at least 40 members of the class. The exact number of class members is unknown to Plaintiff at this time and can be ascertained only through appropriate discovery. The class is ascertainable in that the names and addresses of all class members can be identified in business records maintained by Defendant.

- ii. **Common Questions Predominate**: There exists a well-defined community of interest in the questions of law and fact involved that affect the parties to be represented. These common questions of law and fact predominate over questions that may affect individual class members. Such issues include, but are not limited to: (a) The existence of the Defendant's identical conduct particular to the matter at issue; (b) Defendant's violations of the FDCPA, specifically 15 U.S.C. §1692e and 15 U.S.C. §1692g; (c) The availability of statutory penalties; and (d) Attorney's fees and costs.
- iii. **Typicality**: Plaintiff's claims are typical of those of the class they seek to represent. Plaintiff's claims and those of each class member originate from the same conduct, practice, and procedure, on the part of Defendant. Thus, if brought and prosecuted individually, the claims of each class member would require proof of the same material and substantive facts. Plaintiff possesses the same interests and has suffered the same injuries as each class member. Plaintiff asserts identical claims and seeks identical relief on behalf of the unnamed class members.
- iv. **Adequacy**: Plaintiff will fairly and adequately protect the interests of each class and has no interest adverse to or which directly and irrevocably conflicts with the interests of other members of each class. Plaintiff is willing and prepared to serve this Court and the proposed class. The interests of the Plaintiff are co-extensive with and not antagonistic to those of the absent class members. Plaintiff has retained the services of counsel who are experienced in FDCPA class action litigation and will adequately prosecute this action, and

will assert, protect and otherwise represent Plaintiff and all absent class members. Neither the Plaintiff nor their counsel have any interests which might cause them to not vigorously pursue the instant class action lawsuit.

- v. **Superiority**: A class action is superior to the other available means for the fair and efficient adjudication of this controversy because individual joinder of all members would be impracticable. Class action treatment will permit a large number of similarly situated persons to prosecute their common claims in a single forum efficiently and without unnecessary duplication of effort and expense that individual actions would engender. Furthermore, a class action is superior for the fair and efficient adjudication of this matter because individual actions are not economically feasible, members of the class are likely to be unaware of their rights or that they were violated, and Congress intended class actions to be the principal enforcement mechanism under the FDCPA.

WHEREFORE, the Court should enter judgment in favor of Plaintiff and the class and against Defendant for:

1. An order certifying that Count I may be maintained as a class action pursuant to Rule 4:32 and appointing Plaintiff and the undersigned counsel to represent the class as previously set forth and defined above;
2. Adjudging that EIS violated 15 U.S.C. §§ 1692e, 1692e(2)(A), 1692g, and 1692g(a)(1);
3. An award of statutory damages for Plaintiff and the class pursuant to 15 U.S.C. § 1692k;
4. Attorney's fees, litigation expenses and costs of suit pursuant to 15 U.S.C. §1692k; and
5. Such other and further relief as the Court deems proper.

Dated: Teaneck, NJ
June 21, 2024

/s/ Ryan Gentile
By: _____
Ryan Gentile, Esq.
Attorney for Plaintiff
185 Cedar Lane – Suite U5
Teaneck, NJ 07666
Tel: (201) 873-7675
rlg@lawgmf.com

DESIGNATION OF TRIAL COUNSEL

Plaintiff designates Ryan Gentile as trial counsel

CERTIFICATION OF NO OTHER ACTIONS

I certify, pursuant to New Jersey Court Rule 4:5-1, that the matter in controversy in the within action is not the subject of any other action pending in any other court or a pending arbitration proceeding to the best of my knowledge and belief. Also, to the best of my knowledge and belief no other action or arbitration proceeding is contemplated. Further, other than the parties set forth in this complaint, I know of no other parties that should be made a part of this lawsuit. In addition, I recognize my continuing obligation to file and serve on all parties and the court an amended certification if there is a change in the facts stated in this original certification. I certify that confidential personal identifiers, as defined in rule 1:38-7(a), have been redacted from documents now submitted to the Court and will also be redacted from all documents submitted in the future pursuant to Rule 1:38-7(b).

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: Teaneck, NJ
June 21, 2024

Law Offices of Gus Michael Farinella, PC

/s/ Ryan Gentile
By: _____
Ryan Gentile, Esq.
Attorney for Plaintiff
185 Cedar Lane – Suite U5
Teaneck, NJ 07666
Tel: (201) 873-7675
rlg@lawgmf.com

JURY DEMAND

The plaintiff demands trial by a jury on all of the triable issues of this complaint, pursuant to New Jersey Court Rules 1:8-2(b) and 4:35-1(a).

Dated: Teaneck, NJ
June 21, 2024

Law Offices of Gus Michael Farinella, PC

/s/ Ryan Gentile

By: _____

Ryan Gentile, Esq.
Attorney for Plaintiff
185 Cedar Lane – Suite U5
Teaneck, NJ 07666
Tel: (201) 873-7675
rlg@lawgmf.com

EXHIBIT A

Estate Information Services, LLC dba EIS Management
PO Box 1398
Reynoldsburg, OH 43068-6398

(866) 938-3758
M-T 8am-9pm, W-Th 8am-7pm, F 8am-5pm Eastern
www.elsmgmt.com

To: ALEXANDRIA SMITH
Carteret, NJ 07008-2172

Reference: 9829
08/11/2024

EIS Management is a debt collector. We are trying to collect a debt owed by ALEXANDRIA SMITH to Discover Bank. We will use any information you give us to help collect the debt.

Our information shows:

ALEXANDRIA SMITH had a DISCOVER CARD from Discover Bank with account number *****2208.

As of December 31, 2022, amount owed: \$7,981.48

Between December 31, 2022, and today:

This amount in interest was + \$0.00

This amount in fees was charged: + \$0.00

This amount was paid or credited toward the debt: - \$-173.00

Total amount of the debt now: \$7,981.48

How can you dispute the debt?

- Call or write to us by July 18, 2024, to dispute all or part of the debt. If you do not, we will assume that our information is correct.
- If you write to us by July 18, 2024, we must stop collection on any amount you dispute until we send you information that shows you owe the debt. You may use the form below or write to us without the form. You may also include supporting documents. We accept disputes electronically at www.elsmgmt.com/dispute

What else can you do?

- Write to ask for the name and address of the original creditor, if different from the current creditor. If you write by July 18, 2024, we must stop collection until we send you that information. You may use the form below or write to us without the form. We accept such requests electronically at www.elsmgmt.com/dispute
- Go to www.cfpb.gov/debt-collection to learn more about your rights under federal law. For instance, you have the right to stop or limit how we contact you.
- Contact us about your payment options.

Cut Along This Line

Mail this form to:

Estate Information Services, LLC dba EIS Management

PO Box 1398

Reynoldsburg, OH 43068-6398

ALEXANDRIA SMITH

Carteret, NJ 07008-2172

How do you want to respond?

Check all that apply

☐ I want to dispute the debt because I think:

☐ This is not my debt.

☐ The amount is wrong.

☐ Other (please describe on reverse or attach additional information).

☐ I enclosed this amount: \$

Make your check payable to Discover Bank.

Include the reference number 9829.

Civil Case Information Statement

Case Details: MIDDLESEX | Civil Part Docket# L-003645-24

Case Caption: SMITH ALEXANDRI VS ESTATE

INFORMATION S SERVICES

Case Initiation Date: 06/21/2024

Attorney Name: RYAN L GENTILE

Firm Name: GUS MICHAEL FARINELLA PC

Address: 185 CEDAR LANE - SUITE U5

TEANECK NJ 07666

Phone: 2018737675

Name of Party: PLAINTIFF : Smith, Alexandri

Name of Defendant's Primary Insurance Company

(if known): Unknown

Case Type: TORT-OTHER

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

Does this case involve claims related to COVID-19? NO

Are sexual abuse claims alleged by: Alexandri Smith? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? YES

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? YES **Title 59?** NO **Consumer Fraud?** NO
Medical Debt Claim? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

06/21/2024

Dated

/s/ RYAN L GENTILE

Signed

MIDDLESEX VICINAGE CIVIL DIVISION
P O BOX 2633
56 PATERSON STREET
NEW BRUNSWICK NJ 08903-2633

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (732) 645-4300
COURT HOURS 8:30 AM - 4:30 PM

DATE: JUNE 21, 2024
RE: SMITH ALEXANDRI VS ESTATE INFORMATION S SERVICES
DOCKET: MID L -003645 24

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON BENJAMIN S. BUCCA

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 003
AT: (732) 645-4300 EXT 88371.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.4:5A-2.

ATTENTION:

ATT: RYAN L. GENTILE
GUS MICHAEL FARINELLA PC
185 CEDAR LANE - SUITE U5
TEANECK NJ 07666

ECOURTS