

Approved, SCAO

Original - Court  
1st copy - Defendant

2nd copy - Plaintiff  
3rd copy - Return

STATE OF MICHIGAN  
35 JUDICIAL DISTRICT  
JUDICIAL CIRCUIT  
8th District COUNTY PROBATE

SUMMONS

22E04333

CASE NO.

223063866

Court address

150 E Crosstown Pkwy Kalamazoo, MI 49001

Court telephone no.

269/384-8171

Plaintiff's name(s), address(es), and telephone no(s).

Advanced Radiology Services, P.C.  
C/O Goodman Frost, PLLC  
20300 W. 12 Mile Rd., Ste. 101  
Southfield, MI 48076  
888/593-0088x400

Defendant's name(s), address(es), and telephone no(s).

Tamera Ricketts  
2319 Bender Rd  
Portage MI 49002

Plaintiff's attorney, bar no., address, and telephone no.

Goodman Frost, PLLC  
Timothy J. Frost (P40616)  
20300 W. 12 Mile Rd., Ste. 101  
Southfield, MI 48076  
888/593-0088x400

**Instructions:** Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (form MC 21). The summons section will be completed by the court clerk.

**Domestic Relations Case**

- There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (form MC 21) listing those cases.
- It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

**Civil Case**

- This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.
- MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in  this court,  \_\_\_\_\_ Court, where

it was given case number \_\_\_\_\_ and assigned to Judge \_\_\_\_\_.

The action  remains  is no longer pending.

Summons section completed by court clerk.

**SUMMONS**

**NOTICE TO THE DEFENDANT:** In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to file a written answer with the court and serve a copy on the other party or take other lawful action with the court (28 days if you were served by mail or you were served outside this state).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date	Expiration date*	Court clerk
12/22/23	3-13-23	KEVIN M TATROE

\*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

Approved, SCAO

Original - Court  
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STATE OF MICHIGAN  
35 JUDICIAL DISTRICT  
JUDICIAL CIRCUIT  
8th District COUNTY PROBATE

SUMMONS

22E04333

CASE NO.

223D1638GC

Court telephone no.

269/384-8171

Court address

150 E Crosstown Pkwy Kalamazoo, MI 49001

Plaintiff's name(s), address(es), and telephone no(s).

Advanced Radiology Services, P.C.  
C/O Goodman Frost, PLLC  
20300 W. 12 Mile Rd., Ste. 101  
Southfield, MI 48076  
888/593-0088x400

Plaintiff's attorney, bar no., address, and telephone no.

Goodman Frost, PLLC  
Timothy J. Frost (P40616)  
20300 W. 12 Mile Rd., Ste. 101  
Southfield, MI 48076  
888/593-0088x400

v

Defendant's name(s), address(es), and telephone no(s).

Tamera Ricketts  
2319 Bender Rd  
Portage MI 49002

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it was given case number \_\_\_\_\_ and assigned to Judge \_\_\_\_\_.

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Summons section completed by court clerk.

**SUMMONS**

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Issue date	Expiration date*	Court clerk
12-12-22	3-13-23	KEVIN M. TATROE

\*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

STATE OF MICHIGAN  
IN THE 8TH DISTRICT COURT

ADVANCED RADIOLOGY SERVICES, P.C.,

Plaintiff,

v.

TAMERA RICKETTS,

Defendant.

GOODMAN FROST, PLLC  
Robert J. Goodman (P55670)  
Timothy J. Frost (P40616)  
Attorneys for Plaintiff  
20300 W. 12 Mile Rd., Ste. 101  
Southfield, MI 48076  
888/593-0088

**COMPLAINT**

There is no other pending or resolved civil action arising out of the transaction or occurrence alleged in this Complaint.

NOW COMES Plaintiff Advanced Radiology Services, P.C. ("Plaintiff"), through its attorneys, Goodman Frost, PLLC, and for its Complaint against Defendant Tamera Ricketts, states as follows:

1. Plaintiff is a corporation conducting business in the City of Grand Rapids, State of Michigan.
2. Defendant resides and/or conducts business in the City of Portage, State of Michigan.
3. The amount in controversy is less than \$25,000.00, and otherwise within the jurisdiction of this Honorable Court.

**COUNT I - BREACH OF CONTRACT**

4. Plaintiff hereby incorporates by reference Paragraphs 1 through 3 as if set forth herein verbatim.
5. Commencing on or about December 4, 2020, Defendant received medical services from

- Plaintiff, and, in consideration, expressly and/or impliedly agreed to pay for the same.
6. Defendant failed to pay for the medical services provided by Plaintiff thereby breaching the contract.
  7. As a result of Defendant's breach, Plaintiff has sustained damages in the amount of \$395.72, plus costs, interest and/or fees.
  8. This is an attempt to collect a debt and any and all information obtained will be used for that purpose.

**WHEREFORE**, Plaintiff prays that Judgment be entered in its favor and against Defendant in the amount of \$395.72, plus recoverable costs, interest and/or fees, as allowed by law or contract.

**COUNT II - ACCOUNT STATED**

9. Plaintiff incorporates by reference paragraphs 1 - 8 as if stated herein verbatim.
10. Medical services were rendered to Defendant, and invoice(s) were provided to Defendant.
11. The account has become stated as a result of the payments received and/or failure to object to the amounts owed within a reasonable time.
12. As a result of Defendant's breach, she/he owes damages in the amount of \$395.72, plus recoverable costs, interest and/or fees.

**WHEREFORE**, Plaintiff prays that Judgment be entered in its favor and against Defendant in the amount of \$395.72, plus recoverable costs, interest and/or fees, as allowed by law or contract.

**COUNT III - UNJUST ENRICHMENT**

13. Plaintiff hereby incorporates by reference Paragraphs 1 through 12 as if set forth herein verbatim.
14. Plaintiff provided certain medical services to Defendant in the amount of \$395.72, in reliance upon Defendant's agreement to pay for same.
15. Defendant has received a benefit which it would be inequitable for Defendant to retain without compensating Plaintiff.
16. As a result of Defendant's nonpayment for the services provided, Defendant has been unjustly enriched in the amount of \$395.72, plus recoverable costs, interest and/or fees, to the detriment of Plaintiff.

**WHEREFORE**, Plaintiff prays that Judgment be entered in its favor and against Defendant in the amount of \$395.72, plus recoverable costs, interest and/or fees, as allowed by law or contract.

**COUNT IV - QUANTUM MERUIT**

17. Plaintiff hereby incorporates by reference Paragraphs 1 through 16 as if set forth herein verbatim.
18. Plaintiff provided certain medical services to Defendant in the amount of \$395.72, in reliance upon Defendant's agreement to pay for same.
19. Plaintiff is entitled to the reasonable value of the services provided to and/or on behalf of Defendant in the amount of \$395.72, plus recoverable costs, interest and/or fees.

**WHEREFORE**, Plaintiff prays that Judgment be entered in its favor and against Defendant in the amount of \$395.72, plus recoverable costs, interest and/or fees, as allowed by law or contract.

Law Offices  
Goodman Frost, PLLC  
20300 W. 12 Mile Rd, Suite 101  
Southfield, MI 48076

Respectfully Submitted  
GOODMAN FROST, PLLC



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Robert L. Goodman (P55670)  
Timothy J. Frost (P40616)  
Attorneys for Plaintiff

Dated: December 1, 2022  
22E04333