

Our File No.: BN013376  
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Attorneys for Plaintiff

Camden Police FCU	)	SUPERIOR COURT OF NEW JERSEY
	)	LAW DIVISION-BURLINGTON COUNTY
	)	SPECIAL CIVIL PART
Plaintiff,	)	
vs.	)	CIVIL ACTION
	)	
TONYA QUARLES	)	Docket Number
	)	
Defendant(s)	)	<u>COMPLAINT</u>

The plaintiff complains against the defendant and says:

**COUNT 1**

1. For value received, the defendant in Count 1, executed an instrument obligating the defendant to pay money to the plaintiff on March 28, 2019, a copy of which will be provided upon request.

2. Defendant defaulted in the obligation under said Note, and there is due and owing from the defendant to the plaintiff the sum of \$4,245.66, plus interest at a rate of 18% from May 31, 2019, in the amount of \$364.95, plus attorney fees pursuant to the Contract and in the discretion of the Court making a total due and owing from the defendant to the plaintiff in the amount of \$4,610.61.

**Count 2**

1. For value received, the defendant in Count 2, executed an instrument obligating the defendant to pay money to the plaintiff on March 29, 2019, a copy of which will be provided upon request.

2. Defendant defaulted in the obligation under said Note, and there is due and owing from the defendant to the plaintiff the sum of \$855.21, plus interest at a rate of 28% from May 15, 2019, in the amount of \$115.47, plus attorney fees pursuant to the Contract and in the discretion of the Court, making a total due and owing from the defendant to the plaintiff in the amount of \$970.68.

WHEREFORE, plaintiff demands judgment against the defendant in the sum of \$5,581.29 plus attorney fees pursuant to the Contract and in the discretion of the Court plus costs of suit.

MORGAN, BORNSTEIN & MORGAN  
Attorneys for Plaintiff

By:   
ANDREW SELKOW

DATED: August 27, 2020

CERTIFICATION PURSUANT TO R 4:5-1

The undersigned, of full age, hereby certifies:

1. I am an attorney of the State of New Jersey and am associated with the firm of Morgan, Bornstein & Morgan, and am the attorney principally charged with the handling of this matter.

2. To the best of my knowledge and information, the within action is not the subject of any other action pending in any court, or any arbitration proceedings contemplated.

3. To my knowledge and information, there are no other parties who should be joined to this action at this time.

4. This certification is provided pursuant to the requirements of Rule 4:5-1.

5. This claim is not based upon a writ of attachment, Capias ad respondendum, replevin or claim based directly or indirectly upon the sale of a chattel wherein a chattel has been repossessed peaceably or by legal process.

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).

I hereby 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.

  
\_\_\_\_\_  
ANDREW SELKOW

Dated: August 27, 2020

This is for the purpose of collecting a debt, and any information received will be used for that purpose.

P126:nik