PLD-C-001

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address). The Moore Law Group, APC, Ryota Isozaki (321040) Robert Cox (290268) Detrick Ultri (321161) Eric Marquez (331023) Lisette Baptiste (334036) John Phan (338677) P.O. Box 25145, Santa Ana, CA 92799, 3710 S. Susan Street, Ste 210, Santa Ana, CA 92704	FOR COURT USE ONLY
TELEPHONE NO: 800-506-2652 E-MAIL ADDRESS (Optional):	
ATTORNEY FOR (Neither): Plaintiff	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles	
STREET ADDRESS: 9425 Penfield Avenue	
MAILING ADDRESS: Chatsworth CA 91311	
CITY AND ZIP CODE: L.A. County - Chatsworth	
BRANCH NAME:	
PLAINTIFF: Citibank, N.A.	·
DEFENDANT: Megan Agnoletto	
DOES 1 TO	
CONTRACT	
AMENDED COMPLAINT (Number):	
CROSS-COMPLAINT AMENDED CROSS-COMPLAINT (Number):	
Jurisdiction (check all that apply):	CASE NUMBER:
X ACTION IS A LIMITED CIVIL CASE	5.02.10.122.1
Amount demanded X does not exceed \$10,000	
exceeds \$10,000 but does not exceed \$25,000 ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000) ACTION IS RECLASSIFIED by this amended complaint or cross-complaint	
from limited to unlimited from unlimited to limited	
1. Plaintiff (name or names): Citibank, N.A.	
alleges causes of action against defendant* (name or names): Megan Agnoletto)
2. This pleading, including attachments and exhibits, consists of the following number of pa	ages: 3
3. a. Each plaintiff named above is a competent adult	
except plaintiff (name): Citibank, N.A.	
(1)a corporation qualified to do business in California	
(2) an unincorporated entity (describe):	
(3) X other (specify): National Bank organized under Federal La	aw
b. Plaintiff (name):	
a. has complied with the fictitious business name laws and is doing business ur	nder the fictitious name (specify):
b has complied with all licensing requirements as a licensed (specify):	Au 6 15
c. Information about additional plaintiffs who are not competent adults is shown in	Attachment 3c.
4. a. Each defendant named above is a natural person	
except defendant (name): except defendant	
	ess organization, form unknown
(2) a corporation (2) a corpo	
(3) an unincorporated entity (describe): (3) an unin	corporated entity (describe):
(4) a public entity (describe):	c entity (describe):
	specify):
* If this form is used as a cross-complaint, plaintiff means cross-complaint and defendant means cross-complaint. Form Approved for Optional Use COMPLAINT—Contract	ans cross-defendant. Page 1 of 2 Code of Civil Procedure, \$ 425.12

	PLD-C-0
SHORT TITLE: Citibank, N.A. V. Megan Agnoletto	CASE NUMBER
4. (Continued)	·
 b. The true names of defendants sued as Does are unknown to plaintiff. (1) Doe defendants (specify Doe numbers): defendants and acted within the scope of that agency or employment (2) Doe defendants (specify Doe numbers): 	
plaintiff.	
c. Information about additional defendants who are not natural persons is d. Defendants who are joined under Code of Civil Procedure section 382 a	
 5. Plaintiff is required to comply with a claims statute, and a. has complied with applicable claims statutes, or b. is excused from complying because (specify): 	
 6. This action is subject to Civil Code section 1812.10 Civil Code 7. This court is the proper court because a. a defendant entered into the contract here. 	e section 2984.4.
 b a defendant lived here when the contract was entered into. c a defendant lives here now. d the contract was to be performed here. e a defendant is a corporation or unincorporated association and its princing in the property that is the subject of this action is located here. g other (specify): 	pal place of business is here.
The following causes of action are attached and the statements above apply to ea more causes of action attached):	ach (each complaint must have one or
☐ Breach of Contract	
Common Counts	
Other (specify):	
9. Other allegations:	
 10. Plaintiff prays for judgment for costs of suit; for such relief as is fair, just, and e a. X damages of: \$ 4251.88 b. interest on the damages (1) according to proof 	quitable; and for
(2) at the rate of (specify): percent per year from (date):	*Plaintiff waives post charge-
c. attorney's fees *Plaintiff waives attorney fees (1) of: \$ (2) according to proof.	off prejudgment interest
d. 🔯 other (specify): Costs of suit	
11. The paragraphs of this pleading alleged on information and belief are as for Ryota Isozaki Robert Cox Derrick	ollows (specify paragraph numbers):
Date: John Phan	

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RT TITLE: ank, N.A. V. Mega	n Agnoletto	CASE NUMBER:
FIRST	CAUSE OF ACTION—Common Cou	nts
(number)	_	
ATTACHMENT TO		
(Use a separate cause	of action form for each cause of action.)	
CC-1. Plaintiff (name):	Citibank, N.A.	
alleges that defe	ndant (name): Megan Agnoletto	
became indebte	d to X plaintiff other (name):	
(1)	 the last four years on an open book account for money due. because an account was stated in writing by and be was agreed that defendant was indebted to plaintif 	
b. X within (1) (2)	the last two yearsX four years for money had and received by defendant for the u for work, labor, services and materials rendered at and for which defendant promised to pay plaintiff the sum of \$	
(3)	the reasonable value. for goods, wares, and merchandise sold and delive promised to pay plaintiff the sum of \$	ered to defendant and for which defendant
(4) (5)	the reasonable value. X for money lent by plaintiff to defendant at defendar for money paid, laid out, and expended to or for defendant at defendan	•
(6)		es to the CITI MASTERCARD® ntiff having account number 3.
CC-2. \$ 4251.88 plus prejudgmer		is due and unpaid despite plaintiff's deman
from (date):	Plaintiff waives post charge-off prejudgme	ent interest
of	sentitled to attorney fees by an agreement or a statute *Plaintiff waives attorney fees cording to proof.	·
	Costs of suit	
•		•
•	• •	