Assigned for all purposes to: Chatsworth Courthouse, Judicial Officer: Bernie LaForteza

PLD-C-001

AMERICAN EXPRESS LEGAL Pasadena, CA 91101 TERFINOE WO (626) 660-0002 FANNO (Optional: (626) 298-6716 FANNO (Optional: (626) 298-	Aaron N. Baldar	o, Esq./SBN 261	ne, State Bar number, and address): 1156	Our File No.: 406	57312	FOR COURT USE ONLY	
Pasadena, CA 91101 TREPHONEN (626) 660-0002 FAX NO. (Gobone): (626) 298-6716 EMAIL ACCRESS (Common): Aaron N. Baldaro@aexp.com Arrower FOR (Mem): American Express National Bank SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS CITY MOD 28 CODE: Chatsworth, CA 91311 BIRNACH JAME: Chatsworth, CA 91311 BIRNACH JAME: Chatsworth, CA 91311 BIRNACH JAME: Chatsworth Courthouse PLAINTIFF: AMERICAN EXPRESS NATIONAL BANK DEFENDANT: SOPHIA RANKIN and DOES 1 TO 10, inclusive CONTRACT AMENDED COMPLAINT (Number): COMPLAINT AMENDED CROSS-COMPLAINT (Number): Jurisdiction (check all that apply): ACTION IS A LIMITED CIVIL CASE Amount demanded does not exceed \$10,000 EXCRESS 10,000 but does not exceed \$25,000 ACTION IS AL INITED CIVIL CASE (exceeds \$25,000) ACTION IS RECLASSIFIED by this amended complaint or cross-complaint from limited to unlimited from unlimited to limited from unlimited to limited from unlimited to limited from unlimited above is a competent adult Express 10,000 but a competent adult and a completed with the fictitious business name laws and is doing business under the fictitious name (specify): Competent 10,000 but a competent adult (secondo): Does 10,000 but a competent adult (secondo): Does 10,00	The Control of the Co		40				
TELEPHONE BOL (628) 660-0002		1531	+0				
LEMAL LODRESS (CANONAL) AATON N. Baldaro@aexp.com ATTORNEY FOR Name: American Express National Bank SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS 9425 Perifield Avenue MALINA ALDRESS CITY MID 29 CODE. Chalsworth, CA 91311 BRANCH NAME: Chalsworth Courthouse PLAINTIFF: AMERICAN EXPRESS NATIONAL BANK DEFENDANT: SOPHIA RANKIN and DOES 1 TO 10, inclusive CONTRACT AMENDED COMPLAINT (Number): CROSS-COMPLAINT AMENDED COMPLAINT (Number): Jurisdiction (check all that apply): ACTION IS A LIMITED CIVIL CASE Amount demanded does not exceed \$10,000 Cexceeds \$10,000 but does not exceed \$25,000 ACTION IS RECLASSIFIED by this amended complaint or cross-complaint from limited to unlimited from unlimited of limited Throm unlimited of limited Throm unlimited of limited Throm unlimited of limited Cexcept plaintiff (name or names): AMERICAN EXPRESS NATIONAL BANK alleges causes of action against defendant* (name or names): SOPHIA RANKIN and DOES 1 to 10, inclusive This pleading, including attachments and exhibits, consists of the following number of pages: 3 a. Each plaintiff named above is a competent adult Express plaintiff name of the complete of the			72	(626) 208 673	16		
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SH	HORT T	TITLE: /	AMERICAN EXPRESS NATIONAL BANK v. SOPHIA RANKIN, e	et al	CASE NUMBER:
4.	b. T	(1) 🗹 (2) 🗹 Int	names of defendants sued as Does are unknown to plaintiff. Doe defendants (specify Doe numbers): 1-5 defendants and acted within the scope of that agency or employment.	are persons v	nts or employees of the named whose capacities are unknown to achment 4c.
5.		Plaintif a. □ b. □	f is required to comply with a claims statute, and has complied with applicable claims statutes, <i>or</i> is excused from complying because (specify):		
6.		court is a d a d a d the a d rea	ction is subject to Civil Code section 1812.10 Civil Code set the proper court because efendant entered into the contract here. efendant lived here when the contract was entered into. efendant lives here now. contract was to be performed here. efendant is a corporation or unincorporated association and its principal property that is the subject of this action is located here. er (specify):		
	more	Cause Bread Comr	g causes of action are attached and the statements above apply to each s of action attached): h of Contract non Counts (specify): tions:	n (each compl	laint must have one or
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10.	Pla	intiff p a. ☑ b. □ c. □ d. □	rays for judgment for costs of suit; for such relief as is fair, just, and equidamages of: \$11,094.54 interest on the damages (1) according to proof (2) at the rate of (specify): percent per year from (date): attorney's fees (1) of: \$ (2) according to proof. other (specify):	iitable; and for	
11.		The p	aragraphs of this pleading alleged on information and belief are as follo	ws (specify pa	aragraph numbers):
Da	Date: March 7, 2022				
		Aaror	N. Baldaro, Esq./SBN 261156 (TYPE OR PRINT NAME) (S	IGNATURE OF PAR	TY OR ATTORNEY FOR PARTY)

		2LD-C-001(2)
SHORT TITLE: AMERICAN EXPRESS NATIONAL BANK v. SOPHIA RANKIN, et al	CASE NUMBER:	
FIRST CAUSE OF ACTION—Common Counts		
ATTACHMENT TO 🗹 Complaint 🔲 Cross - Complaint		
(Use a separate cause of action form for each cause of action.)		
CC-1. Plaintiff (name): AMERICAN EXPRESS NATIONAL BANK1		
alleges that defendant (name): SOPHIA RANKIN and DOES 1 to 10, inclusive		
became indebted to $lacktriangle$ plaintiff $lacktriangle$ other (name):		
 a.		
(2) Decause an account was stated in writing by and between plaintiff ar	nd defendant in w	hich it was
agreed that defendant was indebted to plaintiff. b. ☑ within the last ☐ two years ☑ four years		
b. ☑ within the last ☐ two years ☑ four years (1) ☐ for money had and received by defendant for the use and benefit of	plaintiff.	
(2)	ce and request o	f defendant
and for which defendant promised to pay plaintiff. ☐ the sum of \$		
the reasonable value.		
(3) Goods, wares, and merchandise sold and delivered to defendant ised to pay plaintiff	and for which de	fendant prom-
the sum of \$		
the reasonable value.		
 (4) ✓ for money lent by plaintiff to defendant at defendant's request. (5) ✓ for money paid, laid out, and expended to or for defendant at defend 	ant's special inst	ance and re-
quest.		
(6) ☑ other (specify): For credit extended by Plaintiff to Defendant for advances by Defendant and/or persons acting with Defendant's permission on the		
card account XXXX-XXXXXX-X1003. Plaintiff has performed all conditions preced		
Defendant has waived them.		
¹ On April 1, 2018, American Express Centurion Bank changed its name to American Express National		
https://www.occ.treas.gov/topics/licensing/interpretations-and-actions/2018/interpretations-and-actions- U.S.C. § 35; 12 C.F.R. § 5.24.	jan-2018.html; See	also 12
CC-2. \$, which is the reasonable value, is due and unpaid despite plaintiff's demand,		
plus prejudgment interest	pe	ercent per year
from <i>(date):</i> CC-3. Plaintiff is entitled to attorney fees by an agreement or a statute		
☐ of\$		
according to proof.		
CC-4. ☑ Other: \$11,094.54, which is the current outstanding balance owed by Defendar	nt to Plaintiff	
	Page	Three