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PLD-C-001

<small>ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):</small> The Moore Law Group, APC, Ryota Isozaki (321040) Robert Cox (290268) Derrick Uhri (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		FAX NO. (Optional):	
E-MAIL ADDRESS (Optional):			
ATTORNEY FOR (Name): 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: Hovsep Kerobyan			
<input type="checkbox"/> DOES 1 TO _____			
CONTRACT			
<input checked="" type="checkbox"/> COMPLAINT		<input type="checkbox"/> AMENDED COMPLAINT (Number):	
<input type="checkbox"/> CROSS-COMPLAINT		<input type="checkbox"/> AMENDED CROSS-COMPLAINT (Number):	
Jurisdiction (check all that apply):			
<input checked="" type="checkbox"/> ACTION IS A LIMITED CIVIL CASE			
Amount demanded		<input checked="" type="checkbox"/> does not exceed \$10,000	
		<input type="checkbox"/> exceeds \$10,000 but does not exceed \$25,000	
<input type="checkbox"/> ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000)			
<input type="checkbox"/> ACTION IS RECLASSIFIED by this amended complaint or cross-complaint			
<input type="checkbox"/> from limited to unlimited			
<input type="checkbox"/> from unlimited to limited			
		CASE NUMBER:	

1. **Plaintiff*** (name or names): Citibank, N.A.

alleges causes of action against **defendant*** (name or names): Hovsep Kerobyan

2. This pleading, including attachments and exhibits, consists of the following number of pages: 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) ☒ other (specify): National Bank organized under Federal Law

- b. ☐ Plaintiff (name):

- a. ☐ has complied with the fictitious business name laws and is doing business under the fictitious name (specify):

- b. ☐ has complied with all licensing requirements as a licensed (specify):

- 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):**

- (1) ☐ a business organization, form unknown

- (2) ☐ a corporation

- (3) ☐ an unincorporated entity (describe):

- (4) ☐ a public entity (describe):

- (5) ☐ other (specify):

☐ except defendant (name):

- (1) ☐ a business organization, form unknown

- (2) ☐ a corporation

- (3) ☐ an unincorporated entity (describe):

- (4) ☐ a public entity (describe):

- (5) ☐ other (specify):

* If this form is used as a cross-complaint, plaintiff means cross-complainant and defendant means cross-defendant.

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Form Approved for Optional Use
Judicial Council of California
PLD-C-001 (Rev. January 1, 2007)

COMPLAINT—Contract

Code of Civil Procedure, § 425.12

American LegalNet, Inc.
www.FormsWorkflow.com

SHORT TITLE: Citibank, N.A. V. Hovsep Kerobyan	CASE NUMBER
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4. (Continued)

b. The true names of defendants sued as Does are unknown to plaintiff.

(1) ☐ Doe defendants (specify Doe numbers): _____ were the agents or employees of the named defendants and acted within the scope of that agency or employment.(2) ☐ Doe defendants (specify Doe numbers): _____ are persons whose capacities are unknown to plaintiff.c. ☐ Information about additional defendants who are not natural persons is contained in Attachment 4c.d. ☐ Defendants who are joined under Code of Civil Procedure section 382 are (names):5. ☐ Plaintiff is required to comply with a claims statute, anda. ☐ has complied with applicable claims statutes, orb. ☐ is excused from complying because (specify):6. ☐ This action is subject to ☐ Civil Code section 1812.10 ☐ Civil Code section 2984.4.

7. This court is the proper court because

a. ☐ a defendant entered into the contract here.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 principal place of business is here.f. ☐ real property that is the subject of this action is located here.g. ☐ other (specify):

8. The following causes of action are attached and the statements above apply to each (each complaint must have one or more causes of action attached):

☐ 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 equitable; and for

a. ☒ damages of: \$ 4441.71b. ☐ interest on the damages(1) ☐ according to proof(2) ☐ at the rate of (specify): _____ percent per year from (date):c. ☐ attorney's fees *Plaintiff waives attorney fees(1) ☐ of: \$(2) ☐ according to proof.d. ☒ other (specify): Costs of suit

*Plaintiff waives post charge-off prejudgment interest

11. ☐ The paragraphs of this pleading alleged on information and belief are as follows (specify paragraph numbers):

Ryota Isozaki ☒ Robert Cox _____ Derrick
 Uhri _____ Eric Marquez _____ Lisette Baptiste _____
 John Phan _____

Date:

MAR 07 2022

(TYPE OR PRINT NAME)

(SIGNATURE OF PLAINTIFF OR ATTORNEY)

(If you wish to verify this pleading, affix a verification.)

SHORT TITLE: Citibank, N.A. V. Hovsep Kerobyan	CASE NUMBER:
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FIRST

(number)

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): Citibank, N.A.

alleges that defendant (name): Hovsep Kerobyan

became indebted to ☒ plaintiff ☐ other (name):a. ☒ within the last four years(1) ☒ on an open book account for money due.(2) ☒ because an account was stated in writing by and between plaintiff and defendant in which it was agreed that defendant was indebted to plaintiff.b. ☒ within the last ☐ two years ☒ four years(1) ☐ for money had and received by defendant for the use and benefit of plaintiff.(2) ☐ for work, labor, services and materials rendered at the special instance and request of defendant and for which defendant promised to pay plaintiff.☐ the sum of \$☐ the reasonable value.(3) ☐ for goods, wares, and merchandise sold and delivered to defendant and for which defendant promised to pay plaintiff☐ 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 defendant's special instance and request.(6) ☒ other (specify): This cause of action relates to the CITI MASTERCARD® credit card issued by Plaintiff having account number XXXXXXXXXXXXXXX9916.

CC-2. \$ 4441.71, which is the reasonable value, is due and unpaid despite plaintiff's demand,

plus prejudgment interest ☐ according to proof ☐ at the rate of _____ percent per year

from (date): *Plaintiff waives post charge-off prejudgment interest

CC-3. ☐ Plaintiff is entitled to attorney fees by an agreement or a statute☐ of \$ *Plaintiff waives attorney fees☐ according to proof.CC-4. ☒ Other: Costs of suit

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