

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

PLD-C-001

<b>ATTORNEY OR PARTY WITHOUT ATTORNEY</b> (Name, State Bar number, and address): Hunt & Henriques, LLP Donald Sherrill #266038     Keri L. Salet #318913 7017 Realm Drive San José CA 95119 TELEPHONE NO: (800) 680-2426 FAX NO. (Optional): (408) 362-2299 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): Plaintiff		<b>FOR COURT USE ONLY</b>
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES</b> STREET ADDRESS: 9425 Penfield Avenue MAILING ADDRESS: CITY AND ZIP CODE: Chatsworth CA 91311-6516 BRANCH NAME: North Valley District		
PLAINTIFF: JPMorgan Chase Bank, N.A.  DEFENDANT: HOANGLAN NGUYEN  <input type="checkbox"/> DOES 1 TO _____		
<b>CONTRACT</b> <input checked="" type="checkbox"/> <b>COMPLAINT</b> <input type="checkbox"/> <b>AMENDED COMPLAINT (Number):</b> <input type="checkbox"/> <b>CROSS-COMPLAINT</b> <input type="checkbox"/> <b>AMENDED CROSS-COMPLAINT (Number):</b>		
<b>Jurisdiction (check all that apply):</b> <input checked="" type="checkbox"/> <b>ACTION IS A LIMITED CIVIL CASE</b> \$7,465.51 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"/> <b>ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000)</b> <input type="checkbox"/> <b>ACTION IS RECLASSIFIED by this amended complaint or cross-complaint</b> <input type="checkbox"/> from limited to unlimited <input type="checkbox"/> from unlimited to limited		CASE NUMBER:

1. **Plaintiff\*** (name or names): JPMorgan Chase Bank, N.A.

alleges causes of action against **defendant\*** (name or names): HOANGLAN NGUYEN

2. This pleading, including attachments and exhibits, consists of the following number of pages: 4

3. a. Each plaintiff named above is a competent adult

☒ **except** plaintiff (name): JPMorgan Chase Bank, N.A.

(1) ☐ a corporation qualified to do business in California

(2) ☐ an unincorporated entity (describe):

(3) ☒ other (specify): A National Banking Association organized and existing under and by virtue of the laws of the United States of America

b. ☐ Plaintiff (name):

a. ☐ has complied with the fictitious business name laws and is doing business under the fictitious name of (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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SHORT TITLE: JPMorgan Chase Bank, N.A. v. HOANGLAN NGUYEN

CASE NUMBER:

## 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 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, **and**a. ☐ 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 fora. ☒ damages of: \$7,465.51b. ☒ interest on the damages(1) ☐ according to the proof(2) ☒ at the rate of (specify): 0.0000 percent per year from (date): September 30, 2021c. ☐ attorney's fees(1) ☐ of: \$(2) ☐ according to proof.d. ☐ other (specify):11. ☐ The paragraphs of this pleading alleged on information and belief are as follows (specify paragraph numbers):

Date: February 17, 2022

Keri L. Salet #318913

(TYPE OR PRINT NAME)



(SIGNATURE OF PLAINTIFF OR ATTORNEY)

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

SHORT TITLE: JPMorgan Chase Bank, N.A. v. HOANGLAN NGUYEN	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): JPMorgan Chase Bank, N.A.

alleges that defendant (name): HOANGLAN NGUYEN

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):

CC-2. \$7,465.51, which is the reasonable value, is due and unpaid despite plaintiff's demand, plus prejudgment interest ☐ according to proof ☒ at the rate of 0.0000 percent per year from (date): September 30, 2021

CC-3. ☐ Plaintiff is entitled to attorney fees by an agreement or a statute

☐ of \$

☐ according to proof.

CC-4. ☐ Other:

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES  
CHATSWORTH JUDICIAL DISTRICT

**STATEMENT OF LOCATION/VENUE**


**CASE NAME: JPMorgan Chase Bank, N.A. v. HOANGLAN NGUYEN,**  
**CASE NUMBER:**

Please check ONE of the following statements to indicate the basis for your filing of the complaint in this Judicial District and fill in the address.

- \_\_\_\_\_ 1. Cause of Action arose in this Judicial District.  
The address of the cause of action is:
- | Street | City | Zip Code |
|--------|------|----------|
|        |      |          |
- \_\_\_\_\_ 2. Property located in this judicial district. The address of this property is:
- | Street | City | Zip Code |
|--------|------|----------|
|        |      |          |
- \_\_\_\_\_ 3. Tort occurred in this judicial district. The address of the tort is:
- | Street (if known)<br>(or nearest major intersection) | City | Zip Code |
|--|------|----------|
|  |      |          |
- \_\_\_\_\_ 4. Contract entered into or to be performed in this judicial district. The address where contract entered into or to be performed is:
- | Street (if known) | City | Zip Code |
|-------------------|------|----------|
|                   |      |          |
- X   5. Defendant resides in this judicial district. The address of the defendant is:  
602 S DUNSMUIR AVE APT 4, LOS ANGELES CA 90036-4065
- | Street | City | Zip Code |
|--------|------|----------|
|        |      |          |

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

DATED: February 17, 2022

  
Signature of Plaintiff's Attorney  
Hunt & Henriques, LLP