Assigned for all purposes to: Chatsworth Courthouse, Judicial Officer: Karen Moskowitz

PLD-C-001

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):		FOR COURT USE ONLY
Hunt & Henriques, LLP Debt collection license application pending.		
Donald Sherrill #266038   Brian Langedyk #337250		
7017 Realm Drive		
San José CA 95119 (400) 600 6406 (400) 600 6406	00.0000	
TELEPHONE NO: (800) 680-2426 FAX NO. (Optional): (408) 38 E-MAIL ADDRESS (Optional):	62-2299	
ATTORNEY FOR (Name): Plaintiff		
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	
No. 56		
STREET ADDRESS: 9425 Penfield Avenue  MAILING ADDRESS:		
CITY AND ZIP CODE: Chatsworth CA 91311-6516		
BRANCH NAME: North Valley District		
PLAINTIFF: CITIBANK, N.A.	, and a second	
DEFENDANT: MARY J OSHEA		
DEFENDANT. MARTI O CONEA		
DOES 1 TO		
CONTRACT		
■ AMENDED COMPLAINT (Numb	per):	
CROSS-COMPLAINT AMENDED CROSS-COMPLAIN	T (Number):	
Jurisdiction (check all that apply):		
X ACTION IS A LIMITED CIVIL CASE	\$9,025.40	CASE NUMBER:
Amount demanded X does not exceed \$10,000		22CHLC05211
exceeds \$10,000, but does not ex	xceed \$25,000	
ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000)		
ACTION IS RECLASSIFIED by this amended complaint or cro	oss-complaint	
from limited to unlimited from unlimited to limited		
Plaintiff* (name or names): CITIBANK, N.A.		
1. Flamul (hame of hames). CITIBANN, N.A.		
alleges causes of action against defendant* (name or names): MAI	RY J OSHEA	
2. This pleading, including attachments and exhibits, consists of the fo	ollowing number of pages	:: 4
a. Each plaintiff named above is a competent adult	one ming frameer of pages	
x except plaintiff (name): CITIBANK, N.A.		
(1) a corporation qualified to do business in California	2	
(2) an unincorporated entity (describe):	a	
	rachized and evicting up	day and by virtue of the laws of the
(3) X other (specify): A National Banking Association o United States of America	organized and existing un	der and by virtue of the laws of the
b. Plaintiff (name):		
a has complied with the fictitious business name laws and	Lie doing business under	the fictitious name of (checiful:
a has complied with the netheds business hame laws and	is doing business under	the nethods hame of (specify).
b. has complied with all licensing requirements as a license	ed (specify):	
c. Information about additional plaintiffs who are not competer	nt adults is shown in Atta	chment 3c.
4. a. Each defendant named above is a natural person		
except defendant (name):	except defendant (nar	ne):
(1) a business organization, form unknown		anization, form unknown
(2) a corporation	(2) a corporation	
(3) an unincorporated entity (describe):	The state of the s	ited entity (describe):
(4) a public entity (describe):	(4) a public entity	
(5) other (specify):  *If this form is used as a cross-complaint, plaintiff means cross-complaint.	(5) other (specify):	
ii tilis form is used as a cross-complaint, plaintin means cross-com	insigniant and detelluant means closs	rage 1 of 2

PLD-C-001 SHORT TITLE: CITIBANK, N.A. v. MARY J OSHEA CASE NUMBER: (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. Doe defendants (specify Doe numbers): are persons whose capacities are unknown to plaintiff. Information about additional defendants who are natural persons is contained in Attachment 4c. 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, or 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. a defendant lived here when the contract was entered into. c. X a defendant lives here now. the contract was to be performed here. a defendant is a corporation or unincorporated association and its principal place of business is here. real property that is the subject of this action is located here. 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 X Common Counts Other (specify): 9. X Other allegations: On July 1, 2011, Citibank (South Dakota) N.A. merged into Citibank, N.A., with Citibank N.A. as the resulting and surviving national banking association. Citibank, N.A. is the current owner of this Citi Mastercard branded credit account and all rights to pursue collection from Defendant. 10. Plaintiff prays for judgment for costs of suit; for such relief as is fair, just, and equitable; and for a. X damages of: \$9,025.40 b. X interest on the damages (1) according to the proof (2) X at the rate of (specify): 0.0000 percent per year from (date): June 15, 2021 c. attorney's fees (1) of: \$ (2) according to proof. other (specify): 11. X The paragraphs of this pleading alleged on information and belief are as follows (specify paragraph numbers): CC-1.a.(1), CC-1.a.(2), CC-1.b.(4), CC-1.b.(5) Date: February 17, 2022

Brian Langedyk #337250

(TYPE OR PRINT NAME)

(SIGNATURE OF PLAINTIFF OR ATTORNEY)

	PLD-C-001
SHORT TITLE: CITIBANK, N.A. v. MARY J OSHEA	CASE NUMBER:
FIRST CAUSE OF ACTION—Common Counts	
ATTACHMENT TO X 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): MARY J OSHEA	
became indebted to X plaintiff X other (name): or its predecessor	in interest
<ul> <li>a. X within the last four years</li> <li>(1) X on an open book account for money due.</li> <li>(2) X because an account was stated in writing by and between was agreed that defendant was indebted to plaintiff.</li> </ul>	en plaintiff and defendant in which it
b. X within the last two years X four years  (1) for money had and received by defendant for the use an  (2) for work, labor, services and materials rendered at the spand for which defendant promised to pay plaintiff.  the sum of \$	
the reasonable value.  (3) for goods, wares, and merchandise sold and delivered to promised to pay plaintiff the sum of \$  the reasonable value.	o defendant and for which defendant
(4) <b>X</b> for money lent by plaintiff to defendant at defendant's red for money paid, laid out, and expended to or for defendant	
request. (6) other (specify):	
CC-2. \$9,025.40 , which is the reasonable value, is due plus prejudgment interest according to proof <b>X</b> at the rate of from <i>(date)</i> : June 15, 2021	and unpaid despite plaintiff's demand,  0.0000 percent per year
CC-3. Plaintiff is entitled to attorney fees by an agreement or a statute  of \$	
according to proof.  CC-4.  Other:	

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

## STATEMENT OF LOCATION/VENUE

CASE NAME: CITIBANK, N.A. v. MARY J OSHEA, CASE NUMBER:

Please check  $\underline{\mathsf{ONE}}$  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) City Zip Code (or nearest major intersection)
4.	Contract entered into or to be performed in this judicial district. The address where contract entered into or to be performed is:
X5.	Street (if known) City Zip Code  Defendant resides in this judicial district. The address of the defendant is: 601 E Del Mar Blvd Apt 209, Pasadena CA 91101-2889  Street City Zip Code
I declare unde correct.	er penalty of perjury under the laws of the State of California that the foregoing is true and
DATED: Feb	ruary 17, 2022  Signature of Plaintiff's Attorney Hunt & Henriques, LLP