

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

COUNTY OF ABBEVILLE

MIDLAND CREDIT MANAGEMENT, INC
Plaintiff

SUMMONS

vs.

(NON-JURY COLLECTION ACTION)

AMANDA PORTER

C/A NO.: _____ --CP-- ____ -- _____

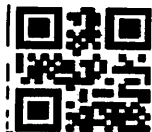
Defendant(s)

TO THE DEFENDANTS ABOVE NAMED:

YOU ARE HEREBY SUMMONED and required to answer the Complaint herein, a copy of which is herewith served upon you, or appear and defend, and to serve a copy of your Answer to said Complaint upon subscriber (s) at his office, 1044 Wildwood Centre Dr., P.O. Box 287, Columbia, South Carolina, 29202 (29229), within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to answer the Complaint within the time aforesaid, or otherwise appear and defend, the Plaintiff in this action will apply to the Court for the relief demanded therein, and judgment by default will be rendered against you for the relief demanded in the Complaint.

CLARKSON & HALE, LLC
s/ Elias Fain
ATTORNEY FOR PLAINTIFF
SC BAR #101193
Post Office Box 287
Columbia, SC 29202
803-602-0789
elias.fain@clarksonlawllc.com

Columbia, South Carolina
July 31, 2024
54-11800



54-11800

PMDC1



STATE OF SOUTH CAROLINA

COUNTY OF ABBEVILLE

MIDLAND CREDIT MANAGEMENT, INC
Plaintiff

vs.

AMANDA PORTER
Defendant(s)

IN THE COURT OF COMMON PLEAS

COMPLAINT

(NON-JURY COLLECTION ACTION)

C/A NO.: _____ --CP-- _____

Plaintiff, complaining of the Defendant, alleges as follows:

(1) The Plaintiff is a limited liability company organized and existing under the laws of the State of Delaware.

(2) The Defendant is upon information and belief a citizen and resident of the County of Abbeville, State of South Carolina.

(3) This is an action for recovery of an indebtedness due unto the Plaintiff arising out of the issuance of a credit card to the Defendant at the request of the Defendant.

(4) COMENITY CAPITAL BANK issued a credit card to the Defendant in the Defendant's name on August 2, 2021 with account number *****2025. The issuance of the credit card created a revolving line of credit on an open account allowing the Defendant to obtain cash advances and/or to make purchases at certain authorized retail establishments. These advances and/or the purchases were to be charged to said account, all of which the Defendant agreed to pay.

(5) In the course of dealing between the parties, Defendant was provided with periodic statements of the account which the Defendant acknowledged by using the account and/or making payments on the account.

(6) On information and belief the last payment on the account was received on January 20, 2023 and the account was charged off on September 30, 2023 in the amount of \$8,860.17.

(7) That for good and valuable consideration the account was subsequently assigned to the Plaintiff making the Plaintiff the holder of the account.

(8) The Defendant's credit card account had certain cash advances and/or purchases charged

to it, the balance of which has gone unpaid and is now delinquent as shown in the verified statement of account attached hereto as Exhibit "A" and incorporated herein by reference. Although demand has been made, there is now due and owing unto the Plaintiff the amount of \$8,860.17.

(9) Plaintiff is entitled to recovery all collection costs.

(10) On information and belief, the Notice of Consumer's Right to Cure, as contemplated under S.C. Code Sections §§ 37-5-110 and 37-5-111, was sent to the Defendant or was not required.

WHEREFORE, the Plaintiff prays before this Court for its Order granting judgment against the Defendant in the amount of \$8,860.17 and the costs of filing this action which are \$180.32 as of the date of the filing (additional costs may be incurred at a future date and included in the balance), and such further relief as may be just and proper.

CLARKSON & HALE, LLC
s/ Elias Fain
ATTORNEY FOR PLAINTIFF
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**NOTICE REQUIRED BY THE FAIR DEBT
COLLECTION PRACTICES ACT, (THE ACT)
15 U.S.C. SECTION 1692 AS AMENDED**

1. The past due amount is \$8,860.17
2. The Creditor is Midland Credit Management, Inc
3. The debt described in the Complaint attached hereto will be assumed to be valid by the Creditor's law firm unless you, the debtor, within thirty (30) days after the receipt of this notice, dispute the validity of the debt or any portion thereof.
4. If you, the debtor, notify the Creditor's law firm in writing within thirty (30) days of the receipt of this notice that the debt or any portion thereof, is disputed, the Creditor's law firm will obtain verification of the debt and a copy of the verification will be mailed to you, the debtor, by the Creditor's law firm.
5. If the Creditor named in paragraph 2 above is not the original Creditor, and if you make a written request to the Creditor's law firm within the thirty (30) days from the receipt of this notice, the name and address of the original Creditor will be mailed to you by the Creditor's law firm.
6. Written requests should be addressed to CLARKSON & HALE, LLC, P.O. Box 287, Columbia, South Carolina 29202.
7. This notice should not be construed as a thirty (30) day grace period. Creditor may pursue collection efforts immediately and not wait thirty (30) days.
8. This notice is an attempt to collect a debt and any information obtained will be used for that purpose.

July 31, 2024
54-11800