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KING COUNTY
SUPERIOR COURT CLERK
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CASE NUMBER: 13-2-17465-1 SEA

1 SUPERIOR COURT OF WASHINGTON
2 FOR KING COUNTY

3 AMERICAN EXPRESS BANK, FSB,)

4 Plaintiff,)

5 vs.)

6 PAUL STICKNEY)

7 Defendant)

) Case No.:

) COMPLAINT FOR MONIES DUE
) AND OWING

8
9 Plaintiff alleges as follows:

- 10 1. Plaintiff is a federal savings bank organized under the laws of the United States
- 11 of America, with a principal place of business in Salt Lake City, Utah. Plaintiff is
- 12 the owner of the claim sued upon herein.
- 13 2. Defendant (s), PAUL STICKNEY , is/are resident(s) of KING County,
- 14 Washington
- 15 3. At all times relevant to this action, Plaintiff had in effect credit account(s) on
- 16 which defendant is /are the obligor(s). The credit account(s) is/are identified as
- 17 ending in 1007.
- 18

19 COMPLAINT - 1

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20 ORIGINAL

1 FIRST CAUSE OF ACTION

2 (Account ending in: 1007)

3 4. Defendant(s) are indebted to Plaintiff on the aforesaid account in the principal
4 amount of \$5,688.06. Despite repeated requests for payment, Defendant(s)
5 have failed to pay the account balance due and owing, or any part thereof, and
6 Defendant(s) are now in default under the terms and conditions of the
7 agreement.

8 5. Plaintiff is entitled to a judgment against Defendant(s) in the principal amount of
9 \$5,688.06, costs, and such other and further relief that this Court deems just and
10 proper.

11 SECOND CAUSE OF ACTION

12 (ACCOUNT ENDING IN: 1007)

13 6. Plaintiff re-alleges paragraphs 1-5 of Plaintiff's First Cause of Action.

14 7. Plaintiff established a credit account for Defendants' use.

15 8. Defendant(s) has/have made purchased goods, wares, and service and/or taken
16 cash advances through the use of the aforementioned account but have failed to
17 pay for those purchases and/or cash.

18 9. There is presently due and owing from Defendant(s) to Plaintiff the principal sum
19 of \$5,688.06. Demand for payment has been made upon Defendant(s) and
20 Defendant(s) have failed to make payment to Plaintiff.

21 10. Plaintiff is entitled to a judgment against Defendant(s) in the principal amount of
22 \$5,688.06, costs, and such other and further relief that this Court deems just and
23 proper.

1 WHEREFORE, Plaintiff, AMERICAN EXPRESS BANK, FSB, demands judgment
2 against Defendant(s), PAUL STICKNEY , as follows:

- 3 A. For the principal sum of \$5,688.06.
- 4 B. Its costs and disbursements incurred in this action.
- 5 C. Such other further and equitable relief as the Court finds just and proper.

6 Dated: FEB 21 2013

7
8 By: 

9 DONNA J. SMITH WSBA #37336
10 AARON MCLELLAN WSBA #45072
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17 Attorney for Plaintiff

1 NOTICE: State and federal law provide protections to defendants who are in the
2 military service, and to their dependents. Dependents of a service member are the
3 service member's spouse, the service member's minor child, or an individual for whom
4 the service member provided more than one-half of the individual's support for one
5 hundred eighty days immediately preceding an application for relief. One protection
6 provided is the protection against the entry of a default judgment in certain
7 circumstances. This notice pertains only to a defendant who is a dependent of a
8 member of the national guard or a military reserve component under a call to active
9 service, or a national guard member under a call to service authorized by the governor
10 of the state of Washington, for a period of more than thirty consecutive days. Other
11 defendants in military service also have protections against default judgments not
12 covered by this notice.

13 If you are the dependent of a member of the national guard or a military reserve
14 component under a call to active service, or a national guard member under a call to
15 service authorized by the governor of the state of Washington, for a period of more than
16 thirty consecutive days, you should notify the plaintiff or the plaintiff's attorneys in writing
17 of your status as such within twenty days of the receipt of this notice. If you fail to do so,
18 then a court or an administrative tribunal may presume that you are not a dependent of
19 an active duty member of the national guard or reserves, or a national guard member
20 under a call to service authorized by the governor of the state of Washington, and
21 proceed with the entry of an order of default and/or a default judgment without further
22 proof of your status. Your response to the plaintiff or plaintiff's attorneys about your
status does not constitute an appearance for jurisdictional purposes in any pending
litigation nor a waiver of your rights.