

**CONSUMER CREDIT TRANSACTION**

CIVIL COURT OF THE CITY OF NEW YORK  
COUNTY OF QUEENS

-----:  
Pedro's Home Furnishings,

Plaintiff,

SUMMONS  
Index No. 12345/2019

- against -

Camille Consumer,  
Defendant.

-----:

To the above-named defendant:

YOU ARE HEREBY SUMMONED and required to serve upon plaintiff's attorney, at her address stated below, an answer to the attached complaint.

If this summons was personally served upon you in the State of New York, the answer must be served within twenty days after such service of the summons, excluding the date of service. If the summons was not personally delivered to you within State of New York, the answer must be served within thirty days after service of the summons is complete as provided by law.

If you do not serve an answer to the attached complaint within the applicable time limitation stated above, a judgment may be entered against you, by default, for the relief demanded in the complaint, without further notice to you.

The action will be heard in the Civil Court of the City of New York, in and for the County of Queens. This action is brought in the County of Queens because it is the county of residence of the Defendant 67-118 Clyde Street, Forest Hills, New York 11375.

Dated: May 8<sup>th</sup>, 2019

Attorney for Plaintiff



Donatella Dewey, Esq.  
Dewey, Cheatem, & Howe, LLP  
300 Jay Street, Suite 622  
Brooklyn, New York 11201  
(718) 260-5124

**CONSUMER CREDIT TRANSACTION**

CIVIL COURT OF THE CITY OF NEW YORK  
COUNTY OF QUEENS

-----:  
Pedro's Home Furnishings,

Plaintiff,

- against -

Camille Consumer,

Defendant.

VERIFIED COMPLAINT  
UNDER CPLR 3016(f)  
Index No. 12345/2019

-----:  
Plaintiff, by its attorneys, Dewey, Cheatem & Howe, LLP, as and for its Complaint  
against Defendant, alleges as follows:

**PARTIES**

1. Plaintiff is a New York corporation with its principal place of business at 35 Flatbush Avenue Extension, Brooklyn, New York, 11201.
2. Defendant is a natural person residing at 67-118 Clyde Street, Forest Hills, New York, 11375.

**JURISDICTION AND VENUE**

3. The events giving rise to this action involve goods sold and delivered to Defendant by Plaintiff.
4. Venue in the County of Queens is proper because that is where the Defendant resides.
5. This Court has jurisdiction over Defendant pursuant to CPLR § 301.
6. This is an action to recover from Defendant the balance due for goods sold and delivered to Defendant, together with applicable interest, costs, and disbursements.

**FIRST CAUSE OF ACTION**

7. Defendant owes Plaintiff \$18,560 dollars for goods sold and delivered to, and accepted by, defendant on January 13, 2018, as follows:

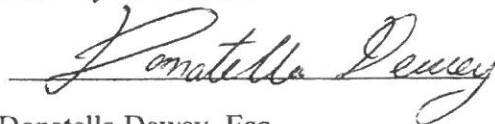
<u>Item</u>	<u>Agreed Price</u>
(1) Computer system and software	\$7,000
(2) A desk	\$4,400
(3) Two chairs	\$2,000
(4) Two end tables	\$1,200
(5) Two lamps	\$460
(6) A coffee table	\$3,500

8. Defendant agreed to pay for these goods by November 30, 2018.
9. Defendant defaulted by failing to repay the account balance.
10. Demand for payment of the Account was made on Defendant, but Defendant failed to make all the required payments.
11. As a result of Defendant's breach of the Agreement, Defendant owes the Plaintiff the sum of \$18,560, no part of which has been paid despite due demand therefor.

WHEREFORE, Plaintiff demands judgment against defendant for \$18,560 dollars, plus interest, costs and disbursements.

Dated: May 8<sup>th</sup>, 2019

Attorney for Plaintiff



Donatella Dewey, Esq.  
Dewey, Cheatem, & Howe, LLP  
300 Jay Street, Suite 622  
Brooklyn, New York 11201  
(718) 260-5124

STATE OF NEW YORK

COUNTY OF KINGS

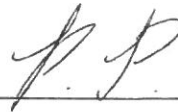
I, Pedro Proprietor, being duly sworn, state:

I am the owner of Pedro's Home Furnishings, Plaintiff in this action. The foregoing complaint is true to my own knowledge, except as to matters therein stated to be alleged on information and belief, and as to those matters I believe it to be true.

Dated: May 8<sup>th</sup>, 2019

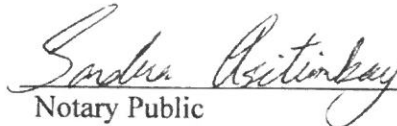
Respectfully submitted,

By: \_\_\_\_\_



PEDRO PROPRIETOR

On this 8th day of May, 2019, before me personally came PEDRO PROPRIETOR, to me known and known to me to be the person described in, and who executed, the foregoing instrument and he acknowledged to me that he executed the same.



Notary Public

Registration No. 0987654

Qualified in Kings County

Registration expires December 20, 2020