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Original - Court  
1st copy - Defendant

STATE OF MICHIGAN

CASE NO.

JUDICIAL DISTRICT  
48TH JUDICIAL CIRCUIT  
DISTRICT COUNTY PROBATE

SUMMONS

Court address

Court telephone no.

4260 TELEGRAPH BLOOMFIELD HILLS, MI 48302

248-647-1141

Plaintiff's name(s), address(es), and telephone no(s).  
BANK OF AMERICA, N.A.

Defendant's name(s), address(es), and telephone no(s).  
WEST BLOOMFIELD,  
MI  
48322

v

Plaintiff's attorney, bar no., address, and telephone no.  
Shermeta Law Group, PLLC  
BY: TRICIA N. MCKINNON (PS0448)  
P.O. Box 5016  
Rochester, MI 48308  
(248) 519-1700 info@shermeta.com

Instructions: Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (form MC 21). The summons section will be completed by the court clerk.

**Domestic Relations Case**

- There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (form MC 21) listing those cases.
- It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

**Civil Case**

- This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.
- MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- X  There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in  this court,  \_\_\_\_\_ Court, where

it was given case number \_\_\_\_\_ and assigned to Judge \_\_\_\_\_.

The action  remains  is no longer pending.

Summons section completed by court clerk.

**SUMMONS**

**NOTICE TO THE DEFENDANT:** In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party **or take other lawful action with the court** (28 days if you were served by mail or you were served outside this state).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date	Expiration date*	Court clerk
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\*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

STATE OF MICHIGAN  
IN THE 48TH JUDICIAL DISTRICT COURT

BANK OF AMERICA, N.A.  
Plaintiff,

vs.

Case No.

O  
Defendant(s). \_\_\_\_\_/  
Shermeta Law Group, PLLC  
BY: TRICIA N. McKINNON (P60448)  
Attorneys for Plaintiff  
P.O. Box 5016  
Rochester, Michigan 48308  
(248) 519-1700 \_\_\_\_\_/

COMPLAINT

NOW COMES Plaintiff, BANK OF AMERICA, N.A.,  
by and through its attorneys,  
Shermeta Law Group, PLLC, and for its Complaint against the above-  
named Defendant(s) states to this Honorable Court as follows:

1. Jurisdiction and venue are proper in this Court.
2. Plaintiff is a national banking association organized and existing under the laws of the United States of America and having its principal place of business in Charlotte, North Carolina.
3. Bank of America, N.A. ("BANA") is the successor-in-interest to FIA Card Services, N.A., formerly known as MBNA America Bank, N.A. ("FIA"). FIA was merged into and under the charter and title of BANA effective October 1, 2014.
4. Defendant(s) applied for and received a credit account, which is owned and administered by Plaintiff (the "Account"). Defendant(s) used or authorized the use of the Account for the acquisition of goods, services, balance transfers or cash advances in accordance with the customer agreement ("Agreement") governing use of the Account with Plaintiff. Upon information and belief, Defendant(s) has possession of the Agreement upon which this claim is based.
5. Defendant(s) breached the Agreement by failing to make periodic payments as required thereby and the Account was subsequently charged-off. The entire balance on the Account is owed to Plaintiff and is presently due and payable in full.
6. The current Account balance is , which includes any applicable payments and credits. The Account is not accruing post charge-off interest.

7. In accordance with federal regulations, monthly periodic statements for the Account have been provided to the Defendant(s). Based on Plaintiff's records, there are no unresolved billing disputes related to the Account.

WHEREFORE, Plaintiff, Bank of America, N.A., prays that judgment be entered against Defendant(s) for:

- a. , which is the current balance due; and
- b. all court costs.

BY:



Dated: JULY 21, 2021

SHERMETA LAW GROUP, PLLC

T. McKinnon (P60448) E. Pallares (P63559)  
G. Dye (P79442) M. Splain (P82148)  
A. Sarhan (P77252) N. Dixit (P82333)  
J. Marks (P73366) / A. Gudowski-Demarais (P81966)

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