

STATE OF MICHIGAN

IN THE 43RD JUDICIAL DISTRICT COURT

Security Credit Services, LLC

Plaintiff,

-vs-

Case No.

Co. [redacted]

Defendant.

Timothy E. Baxter P28045
Bradley Richard Johnson P75416
Attorney for Plaintiff
TIMOTHY BAXTER & ASSOCIATES, P.C.
P.O. Box 2669
Farmington Hills, MI 48333
248/553-1155

"There is no other civil action between these parties arising out of the same transaction or occurrence as alleged in this Complaint pending in this court, nor has any such action been previously filed and dismissed or transferred after having been assigned to a Judge.

COMPLAINT

NOW COMES Plaintiff herein, by and through its attorneys, TIMOTHY E. BAXTER & ASSOCIATES, P.C., and for its Complaint in the above captioned matter states as follows:

1. That Defendant, Col [redacted], resides at 1400 W [redacted] t 8, Ferndale MI 48220.
2. That on or about January 5, 2012, Defendant for good and valuable consideration did execute a Promissory Note payable to Genisys Credit Union, being account # 36000215 [redacted]. A true copy of which is attached hereto and made a part hereof.
3. That Genisys Credit Union fully performed its obligations to Defendant, pursuant to the terms and conditions of said Promissory Note.
4. That Defendant defaulted in making payments on said Promissory Note.
5. That said Promissory Note was subsequently assigned to Plaintiff.
6. That there remains due and owing to Plaintiff by Defendant upon said account the sum of \$12,585.81.

THIS CASE ASSIGNED TO
JUDGE KEITH P. [redacted]
43rd DISTRICT COURT
MADISON HEIGHTS DIVISION
200 WEST THIRTIEN [redacted] RD.
MADISON HEIGHTS, MI 48071
DIRECT ALL ENQUIRIES REGARDING
THIS CASE TO THE ABOVE COURT.

WHEREFORE, Plaintiff respectfully requests this Honorable Court to enter Judgment in favor of Plaintiff against Defendant in the amount of \$12,585.81 plus interest from the date hereof, costs and attorney fees.

TIMOTHY E. BAXTER & ASSOCIATES, P.C.

By: 

Timothy E. Baxter P28045
Bradley Richard Johnson P75416
Attorney for Plaintiff
P.O. Box 2669
Farmington Hills, MI 48333
248/553-1155

Dated: January 20, 2023

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**THIS CASE ASSIGNED TO
JUDGE KEVIN J. HOPKINS
43rd DISTRICT COURT
MADISON HEIGHTS DIVISION
200 WEST TIERCEEN HILL AD.
MADISON HEIGHTS, MI 48071
DETECT ALL REQUESTS REGARDING
THIS CASE TO THE ABOVE COURT.**