

HAMMERMAN & HULTGREN, P.C.

Stanley M. Hammerman
Jon R. Hultgren

ATTORNEYS AT LAW
3101 N. CENTRAL AVENUE, SUITE 500
PHOENIX, ARIZONA 85012

Telephone: (602) 264-2566
Fax: (602) 266-3488
www.hammerman-hultgren.com

June 4, 2018



RE: **Your Past Due Indebtedness to** [REDACTED]
[REDACTED] in the sum of \$29,962.26, plus accrued interest in the sum
of \$2,923.51, plus accruing interest at the contract rate of 6.99% per
annum from and after February 21, 2018

Dear [REDACTED]:

This office represents [REDACTED] regarding your past due account with them. Please note that unless you dispute said debt, or any portion thereof, within thirty (30) days after your receipt of this letter, this office shall assume the validity of this debt. Upon your written notification within such thirty-day period that this debt, or any portion thereof, is disputed, this office shall obtain verification of the debt or a copy of a judgment, if any, against you and mail you a copy of such verification or judgment. Furthermore, upon your written request within said thirty-day period, this office shall provide you with the name and address of the original creditor, if different from the current creditor. If you are interested in resolving this matter, please contact me at (602) 264-2566, Ext. 104. If you are outside of the Maricopa County area please call 1-888-264-2566 Ext. 104.

If you do not dispute this obligation and wish to make a payment, you may utilize our website when making your payment - go to www.hammerman-hultgren.com and click on Make Your Payment Online from there follow the instructions and fill out the appropriate form. This method is safe and secure, and very easy.

Sincerely,

Stanley M. Hammerman

SMH/sh

Hammerman & Hultgren, P.C.'s File Number is [REDACTED]

**THIS LETTER IS FROM A DEBT COLLECTOR AND IS AN ATTEMPT TO COLLECT A DEBT.
ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.**

HAMMERMAN & HULTGREN, P.C.

Stanley M. Hammerman
Jon R. Hultgren

Stephanie A. Webb

ATTORNEYS AT LAW
3101 N. CENTRAL AVENUE, SUITE 500
PHOENIX, ARIZONA 85012

Telephone: (602) 264-2566
Fax: (602) 266-3488
www.hammerman-hultgren.com

July 28, 2017



RE: Your Past Due Indebtedness to [REDACTED] in the sum of \$25,845.77, plus accrued interest in the sum of \$.00, plus accruing interest at the legal rate of 10% per annum from and after November 10, 2016

Gentlemen:

This office represents [REDACTED] regarding your past due account with them. Formal demand is hereby made that full payment be remitted to this office or satisfactory arrangements for payment agreed upon within ten (10) days of the date of this letter. If you fail to comply with either of the above options, further action will be instituted. If you are interested in resolving this matter, please contact [REDACTED] at Ext. 146. If you are outside of the Maricopa County area please call 1-888-264-2566 Ext. 146.

If you do not dispute this obligation and wish to make a payment, you may utilize our website when making your payment - go to www.hammerman-hultgren.com and click on Make Your Payment Online! from there follow the instructions and fill out the appropriate form. This method is safe and secure, and very easy.

In the event suit is filed, we will seek to recover attorneys' fees, interest and court costs, as well as the outstanding balance due and owing.

Sincerely,

Stanley M. Hammerman

SMH/sh

Hammerman & Hultgren, P.C.'s File Number is [REDACTED]

1 Stanley M. Hammerman, Esq., (#004048)
Jon R. Hultgren, Esq., (#010014)
2 **HAMMERMAN & HULTGREN, P.C.**
3101 North Central Avenue, Suite 500
3 Phoenix, Arizona 85012
Telephone: (602) 264-2566
4 Facsimile: (602) 266-3488
Minute_Entry@hammerman-hultgren.com
5

6 Attorneys for Plaintiff

7 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
8 IN AND FOR THE COUNTY OF MARICOPA

9 XYZ CORPORATION, an Arizona
10 corporation,

11 Plaintiff,

12 vs.

13 DENNY DEADBEAT and JANE/JOHN DOE
14 DEADBEAT,

15 Defendant(s).

NO.

COMPLAINT
(Contract)

16 Plaintiff alleges as follows:

17 I.

18 Plaintiff is an Arizona corporation.

19 II.

20 Defendant(s) are residents of the state of Arizona and, at all times material hereto, was
21 acting on behalf of and for the benefit of his marital community, if any.

22 III.

23 On or about June 1, 1999, Defendant, Denny Deadbeat, entered into a contract with Plaintiff
24 for credit card services.

25
26
27
28 ...

1 IV.

2 Defendant(s) breached said contract by failing to pay as required. The last payment was
3 received on November 4, 2013.

4 V.

5 There is still due and owing from Defendant(s) to Plaintiff the sum of not less than
6 Twenty-Six Thousand Two Hundred Sixty-Seven and 02/100 Dollars (\$26,267.02). See Exhibit 1.

7 VI.

8 Plaintiff made demand upon Defendant(s) for such sums due and owing. Defendant(s),
9 however, failed to pay.

10 VII.

11 Pursuant to contract and/or A.R.S. § 12-341.01, Plaintiff is entitled to recover reasonable
12 attorneys' fees arising from this litigation, as well as costs incurred herein.

13 **WHEREFORE**, Plaintiff demands judgment against Defendant(s), and each of them, as
14 follows:

15 1. For the sum of not less than Twenty-Six Thousand Two Hundred Sixty-Seven and 02/100
16 Dollars (\$26,267.02);

17 2. For an award of reasonable attorneys' fees;

18 3. For court costs incurred herein, plus any additional accruing costs; and

19 4. For such other and further relief as the Court may deem just and proper.

20 **DATED** this 1st day of March, 2018.

21 **HAMMERMAN & HULTGREN, P.C.**

22
23
24 By _____
25 Stanley M. Hammerman
26 3101 North Central Avenue, Suite 500
27 Phoenix, Arizona 85012
28 Attorney for Plaintiff

1 Stanley M. Hammerman, Esq., (#004048)
Jon R. Hultgren, Esq., (#010014)
2 **HAMMERMAN & HULTGREN, P.C.**
3101 North Central Avenue, Suite 500
3 Phoenix, Arizona 85012
Telephone: (602) 264-2566
4 Facsimile: (602) 266-3488
minute_entry@hammerman-hultgren.com
5

6 Attorneys for Plaintiff

7 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
8 IN AND FOR THE COUNTY OF MARICOPA
9

10 [REDACTED]

11 Plaintiff,

12 vs.

13 [REDACTED]

14 Defendant.
15
16

NO.

**COMPLAINT
(Contract)**

Eligible for Commercial Court

17
18 Plaintiff alleges as follows:

19 I.

20 Plaintiff is a Connecticut corporation.

21 II.

22 Defendant is an Arizona limited liability company.

23 III.

24 On or about February 10, 2015, Defendant contracted with Plaintiff for workers'
25 compensation insurance covering the period from February 11, 2015, through February 11, 2016,
26 and forwarded to Defendant as Policy No. [REDACTED]. See Exhibit 1.

27
28 ...

1 IV.

2 Defendant failed to pay Plaintiff's invoices when due.

3 V.

4 There is still due and owing from Defendant to Plaintiff the principal sum of not less than
5 Eighty-Seven Thousand Seven Hundred Twenty-Three and xx/100 Dollars (\$87,723.00), plus
6 accruing interest at the legal rate of 10% per annum from and after April 11, 2016. See Exhibit 2.

7 VI.

8 Plaintiff made demand upon Defendant for such sums due and owing. Defendant, however,
9 failed and refused to pay.

10 VII.

11 Pursuant to contract and/or A.R.S. § 12-341.01, Plaintiff is entitled to recover reasonable
12 attorneys' fees arising from this litigation, as well as costs incurred herein.

13 **WHEREFORE**, Plaintiff demands Judgment against Defendant as follows:

- 14 1. For the principal sum of not less than Eighty-Seven Thousand Seven Hundred
15 Twenty-Three and xx/100 Dollars (\$87,723.00), plus accruing interest at the legal rate of 10% per
16 annum from and after April 11, 2016;
- 17 2. For an award of reasonable attorneys' fees;
- 18 3. For court costs incurred herein, plus any additional accruing costs; and
- 19 4. For such other and further relief as the Court may deem just and proper.

20 **DATED** this 16th day of October, 2018.

21 **HAMMERMAN & HULTGREN, P.C.**

22
23 By _____
24 Stanley M. Hammerman
25 3101 North Central Avenue, Suite 500
26 Phoenix, Arizona 85012
27 Attorney for Plaintiff
28

TIER LIMITS TO DISCOVERY

TIER	Dollar Amount	Complexity	Evidence	Witnesses	Fact Witness Depositions	Rule 33 Interrogatories	Rule 34 RFPs	Rule 36 RFAs	Discovery Completion
1	\$50,000 or less	Simple cases tried in 1-2 days	Minimal documentary evidence	Minimal	5 total hours	5	5	10	120 days
2	\$50,000-\$299,999	Intermediate Multiple theories of liability Counterclaims Cross-claims	More than minimal documentary evidence	More than a few witnesses; May have expert witnesses	15 total hours	10	10	10	180 days
3	\$300,000+	Logistically or legally complex (e.g. class actions, multi-party commercial cases)	Voluminous documentary evidence; Numerous pretrial motions	Require management of large number of witnesses	30 total hours	20	10	20	240 days