Wakeeney, KS Trego County, Kansas	
Midland Funding, LLC, Plaintiff,	)
VS.	)
John Doe, Defendant.	) )

Petition on Account

In the District Court

## Count 1 - For MONEY LOANED

COMES NOW Plaintiff and for Count 1 of its cause of action herein states:

- 1. Plaintiff MIDLAND FUNDING LLC is a limited liability company duly organized and existing under the law.
- 2. Defendant, John Doe, is a resident of ...
- 3. All right, title and interest in the right to receive payment as described below were assigned to Plaintiff.
- 4. The original creditor CHASE BANK USA, N.A. provided money by an extension of credit to Defendant and/or for the benefit of Defendant and intended that the money be repaid by Defendant.
- 5. Defendant has failed to repay the money loaned and the balance due 1s \$15192.63, per the Exhibit attached hereto and incorporated by reference.
- 6. Demand for payment was made on or about May 24, 2011.

WHEREFORE, Plaintiff prays for judgment against Defendant in the sum of \$15192.63, together with interest thereon at the rate of 10.00 percent per annum from May 24, 20II, and for Court costs herein expended.

## COUNT2\_ON ACCOUNT

COMES NOW Plaintiff, ALTERNATIVELY, and for Count 2 its cause of action herein states:

- 1. Plaintiff incorporates by reference paragraphs I,2 and 3 of Count 1 as if set out in full herein.
- 4. Defendant is indebted to Plaintiff on account of credit provided by the original creditor

CHASE BANK USA, N.A. to Defendant at Defendant's request in the sum of \$15192.63 per the Exhibit attached hereto and incorporated by reference.

- 5. The charges on said account were reasonable.
- 6. After all offsets and credits due Defendant, there remains a total balance due on sald account in the amount of \$15192.63.
- 7. As a result of Defendant's failure to pay the above balance is due. Demand for payment was made and refused.

WHEREFORE, Plaintiff prays for judgment against Defendant in the sum of \$15192.63, together with interest thereon at the rate of 10. oo percent per annum from May 24, 20rl, and for court costs herein expended.

KRAMER & FRANK, P.C. Names of attorneys Attorneys for Plaintiff Kansas City, MO Telephone: (815)

Fax: (815) E-mail :