



UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

TARRIS RODGERS,

Plaintiff,

v.

EQUIFAX INFORMATION
SERVICES, LLC,

Defendants.

Case No.:

JURY TRIAL DEMANDED

COMPLAINT

Plaintiff Tarris Rodgers (“Plaintiff”) brings the following complaint against defendant and alleges, based upon personal knowledge, information, and belief, and the investigation of counsel, as follows:

INTRODUCTION

1. This is an action to recover damages for violations of the Fair Credit Reporting Act, 15 U.S.C. §§1681, et seq. (the “FCRA”).

PARTIES

2. Plaintiff resides in Hampton County, Virginia, and qualifies as a “consumer” as defined and protected by the FCRA.

3. Defendant Equifax Information Services, LLC (“Defendant” or “Equifax”) is a limited liability company with a principal place of



business at 1550 Peachtree Street, N.W., Atlanta, Georgia 30309, and is authorized to do business within this District.

4. Defendant is a “consumer reporting agency” as defined by the FCRA, and can be served through its registered agent, Corporation Service Company, at 2 Sun Court, Suite 400, Peachtree Corners, Georgia 30092.

JURISDICTION AND VENUE

5. This Court has jurisdiction over Plaintiff’s claims under 28 U.S.C. § 1331 and 15 U.S.C. § 1681p.

6. Venue is proper in this District under 28 U.S.C. § 1391(b)(1).

7. In or around January 2025, Plaintiff contacted Equifax to inquire about the status of his credit file.

8. During that call, an Equifax representative informed Plaintiff that his credit file had been blocked due to a different Social Security number being associated with his credit report.

9. The Equifax representative requested Plaintiff to verify his identity. In response, Plaintiff submitted a copy of his Social Security card, driver’s license, and a selfie, as requested.

10. Plaintiff stated that he never requested a security freeze or block on his credit file.

11. Throughout January and February 2025, Plaintiff contacted Equifax multiple times, requesting that his credit file be unblocked.

12. Despite Plaintiff’s cooperation and submission of all requested documents, Equifax failed to restore his access to the credit file or reinstate his credit history.



13. As a result of Equifax's failure to act, Plaintiff was unable to view or access any credit information through Equifax.

14. In contrast, his credit histories with non-parties Experian and Trans Union remained fully accessible and reflected normal reporting activity.

15. On February 7, 2025, Plaintiff submitted a dispute with the Consumer Protection Financial Bureau ("CFPB") regarding Equifax's blocking of his credit file and consumer report.

Plaintiff Applies for Credit with PenFed Credit Union

16. On or around February 12, 2025, Plaintiff applied for a credit card with PenFed Credit Union ("PenFed").

17. On the same day, Plaintiff received a written denial from PenFed with a stated reason for the denial of "no credit file" and "We were unable to obtain a credit file."

18. Plaintiff reasonably believes that this denial was directly caused by Equifax's failure to properly restore Plaintiff's credit file and reporting data.

19. By reporting inaccurate information in the credit file presumably about Plaintiff, specifically that Plaintiff does not have a credit file, Defendant failed to follow reasonable procedures to assure the maximum possible accuracy of the information contained within Plaintiff's credit files and consumer reports, in violation of 15 U.S.C. § 1681e(b).

Plaintiff Disputes with Equifax

20. Based on a credit report dated April 30, 2025, Equifax was still not reporting any credit history or tradelines for the Plaintiff.



21. On May 12, 2025, Plaintiff submitted a dispute to Equifax wherein he explained that all of his tradelines had disappeared from his Equifax credit report and asked that they be reinstated (the “May Dispute”).

22. Plaintiff included copies of his driver’s license, proof of address via utility bill, and the denial letter from PenFed in the May Dispute.

23. Plaintiff further told Equifax that an agent of Equifax had previously told him the file was blocked because a different Social Security number had been associated with it.

24. Upon information and belief, Plaintiff never received a response from Equifax regarding the May Dispute.

25. Despite receiving Plaintiff’s dispute and all the required documents, Equifax still did not fix the issue.

26. Upon information and belief, Equifax failed to adequately review all of the information provided to it by Plaintiff, failed to conduct a reasonable reinvestigation of Plaintiff’s May Dispute, and failed to correct the reporting.

27. Equifax failed to conduct a reasonable reinvestigation of Plaintiff’s dispute tendered in May 2025, or any reinvestigation whatsoever, to determine whether the disputed information is inaccurate and record the current status of the disputed information, in violation of 15 U.S.C. § 1681i(a)(1)(A).

28. As of July 1, 2025, Equifax continued to show no credit history or tradelines on the Plaintiff’s report, and the credit freeze was still in place.

29. Plaintiff reasonably believes that Equifax continued to publish that Plaintiff did not have any credit history or tradelines, even



though his Experian and TransUnion reports show around 40 active accounts.

30. On June 4, 2025, Plaintiff followed up with Equifax, explaining that it had failed to respond to his dispute.

31. On August 5, 2025, Plaintiff once more followed up with Equifax, explaining that no response to his dispute had been provided.

32. Equifax's inaccurate reporting, including the report that Plaintiff has no credit history or tradelines, has made it practically impossible for Plaintiff to obtain credit.

33. At all times pertinent hereto, Defendant was acting by and through its agents, servants, and/or employees who were acting within the course and scope of their agency or employment, and under Defendant's direct supervision and control.

34. At all times pertinent hereto, the conduct of Defendant, its agents, servants, and/or employees, was intentional, willful, reckless, grossly negligent and in utter disregard for federal law and Plaintiff's rights.

35. Defendant is aware of the shortcomings of its procedures and intentionally chooses not to comply with the FCRA to lower its costs. Accordingly, Defendant's violations of the FCRA are willful.

36. As a result of Defendant's conduct, action, and inaction, Plaintiff suffered damage by loss of credit; loss of ability to purchase and benefit from his credit rating; detriment to his credit rating; the expenditure of time and money disputing and trying to correct the inaccurate credit reporting; the expenditure of labor and effort disputing and trying to correct the inaccurate credit reporting; and emotional distress including the mental and emotional pain, anguish, humiliation, and embarrassment of credit denials.



CLAIMS FOR RELIEF

COUNT I

15 U.S.C. § 1681e(b) Failure to Follow Reasonable Procedures to Assure Maximum Possible Accuracy (First Claim for Relief Against Defendant Equifax)

37. Plaintiff re-alleges and incorporates by reference the allegations set forth in preceding paragraphs as if fully stated herein.

38. The FCRA imposes a duty on consumer reporting agencies to devise and implement procedures to ensure the “maximum possible accuracy” of consumer reports, as follows:

Whenever a consumer reporting agency prepares a consumer report, it shall follow reasonable procedures to assure maximum possible accuracy of the information concerning the individual about whom the report relates.

15 U.S.C. §1681e(b) (emphasis added).

39. On numerous occasions, Defendant prepared patently false consumer reports concerning Plaintiff.

40. Defendant readily sold such false reports to one or more third parties, thereby misrepresenting Plaintiff, and ultimately Plaintiff’s creditworthiness.

41. Defendant violated 15 U.S.C. § 1681e(b) by failing to establish or to follow reasonable procedures to assure maximum possible accuracy in the preparation of the credit reports and credit files it published and maintained concerning Plaintiff.

42. As a result of Defendant’s conduct, action, and inaction,



Plaintiff suffered damage by loss of credit; loss of ability to purchase and benefit from his good credit rating; detriment to his credit rating; the expenditure of time and money disputing and trying to correct the inaccurate credit reporting; the expenditure of labor and effort disputing and trying to correct the inaccurate credit reporting; and emotional distress including the mental and emotional pain, anguish, humiliation, and embarrassment of credit denials.

43. Defendant's conduct, actions, and inactions were willful, rendering it liable for actual or statutory damages, and punitive damages in an amount to be determined by the Court pursuant to 15 U.S.C. § 1681n. Alternatively, Defendant was negligent, entitling Plaintiff to recover under 15 U.S.C. § 1681o.

44. Plaintiff is entitled to recover attorneys' fees and costs from Defendant Equifax in an amount to be determined by the Court pursuant to 15 U.S.C. § 1681n and/or § 1681o.

COUNT II

15 U.S.C. § 1681i

Failure to Perform a Reasonable Reinvestigation (Second Claim for Relief Against Defendant Equifax)

45. Plaintiff re-alleges and incorporates by reference the allegations set forth in preceding paragraphs as if fully stated herein.

46. The FCRA mandates that a CRA conducts an investigation of the accuracy of information "[I]f the completeness or accuracy of any item of information contained in a consumer's file" is disputed by the consumer. See 15 U.S.C. § 1681i(a)(1). The Act imposed a 30-day time limit for the completion of such an investigation. *Id.*

47. The FCRA provides that if a CRA conducts an investigation



of disputed information and confirms that the information is in fact inaccurate or is unable to verify the accuracy of the disputed information, the CRA is required to delete that item of information from the consumer's file. See 15 U.S.C. § 1681i(a)(5)(A).

48. On at least one occasion during the past two years, Plaintiff disputed the inaccurate information with Defendant and requested that they correct and/or delete a specific item in his credit file that is patently inaccurate, misleading, and highly damaging to him, namely, the representation that Plaintiff didn't have a credit score or credit file reported by Defendant.

49. In response to Plaintiff's dispute, Defendant failed to conduct a reinvestigation, or such investigation was so shoddy as to allow patently false, logically inconsistent, and damaging information to remain in Plaintiff's credit file.

50. The Credit Bureau Defendant violated 15 U.S.C. § 1681i by failing to conduct a reasonable reinvestigation to determine whether the disputed information was inaccurate and record the current status of the disputed information, or delete the disputed information, before the end of the 30-day period beginning on the date on which they received the notices of dispute from Plaintiff; and by failing to maintain reasonable procedures with which to filter and verify disputed information in Plaintiff's credit file.

51. As a result of Defendant's conduct, action, and inaction, Plaintiff suffered damage by loss of credit; loss of ability to purchase and benefit from his good credit rating; detriment to his credit rating; the expenditure of time and money disputing and trying to correct the inaccurate credit reporting; the expenditure of labor and effort disputing and trying to correct the inaccurate credit reporting; and emotional distress including the mental and emotional pain, anguish, humiliation, and embarrassment of credit denials.



52. Defendant's conduct, actions, and inactions were willful, rendering it liable for actual or statutory damages, and punitive damages in an amount to be determined by the Court pursuant to 15 U.S.C. § 1681n. Alternatively, Defendant was negligent, entitling Plaintiff to recover under 15 U.S.C. § 1681o.

53. Plaintiff is entitled to recover attorneys' fees and costs from Defendant Equifax in an amount to be determined by the Court pursuant to 15 U.S.C. § 1681n and/or § 1681o.

DEMAND FOR JURY TRIAL

54. Plaintiff hereby demands a jury trial on all issues so triable.

PRAYER FOR RELIEF

55. **WHEREFORE**, Plaintiff seeks judgment in Plaintiff's favor and damages against the Defendants, based on the following requested relief:

- i. statutory damages;
- ii. actual damages;
- iii. punitive damages;
- iv. costs and reasonable attorney's fees pursuant to 15 U.S.C. §§ 1681n and 1681o; and
- v. such other and further relief as may be necessary, just, and proper.



RESPECTFULLY SUBMITTED,

Dated: September 30, 2025

By: /s/ Moshe Boroosan
Moshe Boroosan, GA Bar #744128
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Attorneys for Plaintiff,
Tarris Rodgers



CIVIL COVER SHEET

The JS44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form is required for the use of the Clerk of Court for the purpose of initiating the civil docket record. (SEE INSTRUCTIONS ATTACHED)

I. (a) PLAINTIFF(S)

TARRIS RODGERS

DEFENDANT(S)

EQUIFAX INFORMATION SERVICES, LLC

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF

Out of State

(EXCEPT IN U.S. PLAINTIFF CASES)

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED

(c) ATTORNEYS (FIRM NAME, ADDRESS, TELEPHONE NUMBER, AND E-MAIL ADDRESS)

Moshe Boroosan,
CONSUMER ATTORNEYS,
2800 N Druid Hills NE, Building A, Suite D,
Atlanta, GA 30329, T: (718) 887-2926,
E: mboroosan@consumerattorneys.com

ATTORNEYS (IF KNOWN)**II. BASIS OF JURISDICTION**

(PLACE AN "X" IN ONE BOX ONLY)

- | | |
|--|--|
| ☐ 1 U.S. GOVERNMENT PLAINTIFF | ☒ 3 FEDERAL QUESTION (U.S. GOVERNMENT NOT A PARTY) |
| ☐ 2 U.S. GOVERNMENT DEFENDANT | ☐ 4 DIVERSITY (INDICATE CITIZENSHIP OF PARTIES IN ITEM III) |

III. CITIZENSHIP OF PRINCIPAL PARTIES(PLACE AN "X" IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT)
(FOR DIVERSITY CASES ONLY)

- | PLF | DEF | PLF | DEF |
|----------------------------|--|----------------------------|--|
| ☐ 1 | ☐ 1 CITIZEN OF THIS STATE | ☐ 4 | ☐ 4 INCORPORATED OR PRINCIPAL PLACE OF BUSINESS IN THIS STATE |
| ☐ 2 | ☐ 2 CITIZEN OF ANOTHER STATE | ☐ 5 | ☐ 5 INCORPORATED AND PRINCIPAL PLACE OF BUSINESS IN ANOTHER STATE |
| ☐ 3 | ☐ 3 CITIZEN OR SUBJECT OF A FOREIGN COUNTRY | ☐ 6 | ☐ 6 FOREIGN NATION |

IV. ORIGIN (PLACE AN "X" IN ONE BOX ONLY)

- | | | | | | | |
|---|---|--|---|---|--|--|
| ☒ 1 ORIGINAL PROCEEDING | ☐ 2 REMOVED FROM STATE COURT | ☐ 3 REMANDED FROM APPELLATE COURT | ☐ 4 REINSTATED OR REOPENED | ☐ 5 TRANSFERRED FROM ANOTHER DISTRICT (Specify District) | ☐ 6 MULTIDISTRICT LITIGATION - TRANSFER | ☐ 7 APPEAL TO DISTRICT JUDGE FROM MAGISTRATE JUDGE JUDGMENT |
| ☐ 8 MULTIDISTRICT LITIGATION - DIRECT FILE | | | | | | |

V. CAUSE OF ACTION

(CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE - DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY)

Fair Credit Reporting Act ("FCRA"), 15 U.S.C. § 1681, et. seq.
Plaintiff alleges violations of the Fair Credit Reporting Act by Defendant.

- | | | |
|------------------------------|--|---|
| ☐ YES | ☒ NO | Does the relief requested in the complaint or petition seek to bar or mandate statewide and/or nationwide enforcement of a state and/or federal law, including a rule, regulation, policy, or order of the executive branch or a state and/or federal agency, whether by declaratory judgment and/or any form of injunctive relief? |
|------------------------------|--|---|

(IF COMPLEX, CHECK REASON BELOW)

- | | |
|---|---|
| ☐ 1. Unusually large number of parties. | ☐ 6. Problems locating or preserving evidence |
| ☐ 2. Unusually large number of claims or defenses. | ☐ 7. Pending parallel investigations or actions by government. |
| ☐ 3. Factual issues are exceptionally complex | ☐ 8. Multiple use of experts. |
| ☐ 4. Greater than normal volume of evidence. | ☐ 9. Need for discovery outside United States boundaries. |
| ☐ 5. Extended discovery period is needed. | ☐ 10. Existence of highly technical issues and proof. |

CONTINUED ON REVERSE**FOR OFFICE USE ONLY**

RECEIPT # _____

AMOUNT \$ _____

APPLYING IFP _____

MAG. JUDGE (IFP) _____

JUDGE _____

MAG. JUDGE _____

NATURE OF SUIT _____

CAUSE OF ACTION _____

(Referral)



VI. NATURE OF SUIT (PLACE AN "X" IN ONE BOX ONLY)

CONTRACT - "0" MONTHS DISCOVERY TRACK

- ☐ 150 RECOVERY OF OVERPAYMENT & ENFORCEMENT OF JUDGMENT
- ☐ 152 RECOVERY OF DEFAULTED STUDENT LOANS (Excl. Veterans)
- ☐ 153 RECOVERY OF OVERPAYMENT OF VETERAN'S BENEFITS

CONTRACT - "4" MONTHS DISCOVERY TRACK

- ☐ 110 INSURANCE
- ☐ 120 MARINE
- ☐ 130 MILLER ACT
- ☐ 140 NEGOTIABLE INSTRUMENT
- ☐ 151 MEDICARE ACT
- ☐ 160 STOCKHOLDERS' SUITS
- ☐ 190 OTHER CONTRACT
- ☐ 195 CONTRACT PRODUCT LIABILITY
- ☐ 196 FRANCHISE

REAL PROPERTY - "4" MONTHS DISCOVERY TRACK

- ☐ 210 LAND CONDEMNATION
- ☐ 220 FORECLOSURE
- ☐ 230 RENT LEASE & EJECTMENT
- ☐ 240 TORTS TO LAND
- ☐ 245 TORT PRODUCT LIABILITY
- ☐ 290 ALL OTHER REAL PROPERTY

TORTS - PERSONAL INJURY - "4" MONTHS DISCOVERY TRACK

- ☐ 310 AIRPLANE
- ☐ 315 AIRPLANE PRODUCT LIABILITY
- ☐ 320 ASSAULT, LIBEL & SLANDER
- ☐ 330 FEDERAL EMPLOYERS' LIABILITY
- ☐ 340 MARINE
- ☐ 345 MARINE PRODUCT LIABILITY
- ☐ 350 MOTOR VEHICLE
- ☐ 355 MOTOR VEHICLE PRODUCT LIABILITY
- ☐ 360 OTHER PERSONAL INJURY
- ☐ 362 PERSONAL INJURY - MEDICAL MALPRACTICE
- ☐ 365 PERSONAL INJURY - PRODUCT LIABILITY
- ☐ 367 PERSONAL INJURY - HEALTH CARE/ PHARMACEUTICAL PRODUCT LIABILITY
- ☐ 368 ASBESTOS PERSONAL INJURY PRODUCT LIABILITY

TORTS - PERSONAL PROPERTY - "4" MONTHS DISCOVERY TRACK

- ☐ 370 OTHER FRAUD
- ☐ 371 TRUTH IN LENDING
- ☐ 380 OTHER PERSONAL PROPERTY DAMAGE
- ☐ 385 PROPERTY DAMAGE PRODUCT LIABILITY

BANKRUPTCY - "0" MONTHS DISCOVERY TRACK

- ☐ 422 APPEAL 28 USC 158
- ☐ 423 WITHDRAWAL 28 USC 157

CIVIL RIGHTS - "4" MONTHS DISCOVERY TRACK

- ☐ 440 OTHER CIVIL RIGHTS
- ☐ 441 VOTING
- ☐ 442 EMPLOYMENT
- ☐ 443 HOUSING/ ACCOMMODATIONS
- ☐ 445 AMERICANS with DISABILITIES - Employment
- ☐ 446 AMERICANS with DISABILITIES - Other
- ☐ 448 EDUCATION

IMMIGRATION - "0" MONTHS DISCOVERY TRACK

- ☐ 462 NATURALIZATION APPLICATION
- ☐ 465 OTHER IMMIGRATION ACTIONS

PRISONER PETITIONS - "0" MONTHS DISCOVERY TRACK

- ☐ 463 HABEAS CORPUS- Alien Detainee
- ☐ 510 MOTIONS TO VACATE SENTENCE
- ☐ 530 HABEAS CORPUS
- ☐ 535 HABEAS CORPUS DEATH PENALTY
- ☐ 540 MANDAMUS & OTHER
- ☐ 550 CIVIL RIGHTS - Filed Pro se
- ☐ 555 PRISON CONDITION(S) - Filed Pro se
- ☐ 560 CIVIL DETAINEE- CONDITIONS OF CONFINEMENT

PRISONER PETITIONS - "4" MONTHS DISCOVERY TRACK

- ☐ 550 CIVIL RIGHTS - Filed by Counsel
- ☐ 555 PRISON CONDITION(S) - Filed by Counsel

FORFEITURE/PENALTY - "4" MONTHS DISCOVERY TRACK

- ☐ 625 DRUG RELATED SEIZURE OF PROPERTY 21 USC 881
- ☐ 690 OTHER

LABOR - "4" MONTHS DISCOVERY TRACK

- ☐ 710 FAIR LABOR STANDARDS ACT
- ☐ 720 LABOR/MGMT. RELATIONS
- ☐ 740 RAILWAY LABOR ACT
- ☐ 751 FAMILY and MEDICAL LEAVE ACT
- ☐ 790 OTHER LABOR LITIGATION
- ☐ 791 EMPL. RET. INC. SECURITY ACT

PROPERTY RIGHTS - "4" MONTHS DISCOVERY TRACK

- ☐ 820 COPYRIGHTS
- ☐ 840 TRADEMARK
- ☐ 880 DEFEND TRADE SECRETS ACT OF 2016 (DTSA)

PROPERTY RIGHTS - "8" MONTHS DISCOVERY TRACK

- ☐ 830 PATENT
- ☐ 835 PATENT-ABBREVIATED NEW DRUG APPLICATIONS (ANDA) - a/k/a Hatch-Waxman cases

SOCIAL SECURITY - "0" MONTHS DISCOVERY TRACK

- ☐ 861 HIA (1395ff)
- ☐ 862 BLACK LUNG (923)
- ☐ 863 DIWW (405(g))
- ☐ 863 DIWW (405(g))
- ☐ 864 SSDI TITLE XVI
- ☐ 865 RSI (405(g))

FEDERAL TAX SUITS - "4" MONTHS DISCOVERY TRACK

- ☐ 870 TAXES (U.S. Plaintiff or Defendant)
- ☐ 871 IRS - THIRD PARTY 26 USC 7609

OTHER STATUTES - "4" MONTHS DISCOVERY TRACK

- ☐ 375 FALSE CLAIMS ACT
- ☐ 376 Qui Tam 31 USC 3729(a)
- ☐ 400 STATE REAPPORTIONMENT
- ☐ 430 BANKS and BANKING
- ☐ 450 COMMERCE/CC RATES/ETC.
- ☐ 460 DEPORTATION
- ☐ 470 RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS
- ☒ 480 CONSUMER CREDIT
- ☐ 485 TELEPHONE CONSUMER PROTECTION ACT
- ☐ 490 CABLE/SATELLITE TV
- ☐ 890 OTHER STATUTORY ACTIONS
- ☐ 891 AGRICULTURAL ACTS
- ☐ 893 ENVIRONMENTAL MATTERS
- ☐ 895 FREEDOM OF INFORMATION ACT 899
- ☐ 899 ADMINISTRATIVE PROCEDURES ACT / REVIEW OR APPEAL OF AGENCY DECISION
- ☐ 950 CONSTITUTIONALITY OF STATE STATUTES

OTHER STATUTES - "8" MONTHS DISCOVERY TRACK

- ☐ 410 ANTI TRUST
- ☐ 850 SECURITIES / COMMODITIES / EXCHANGE

OTHER STATUTES - "0" MONTHS DISCOVERY TRACK

- ☐ 896 ARBITRATION (Confirm / Vacate / Order / Modify)

*** PLEASE NOTE DISCOVERY TRACK FOR EACH CASE TYPE. SEE LOCAL RULE 26.3**

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF CLASS ACTION UNDER F.R.Civ.P. 23 DEMAND \$ _____

JURY DEMAND ☒ YES ☐ NO (CHECK YES ONLY IF DEMANDED IN COMPLAINT)

VIII. RELATED/REFILED CASE(S) IF ANY

JUDGE _____ DOCKET NO. _____

CIVIL CASES ARE DEEMED RELATED IF THE PENDING CASE INVOLVES: (CHECK APPROPRIATE BOX)

- ☐ 1. PROPERTY INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
- ☐ 2. SAME ISSUE OF FACT OR ARISES OUT OF THE SAME EVENT OR TRANSACTION INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
- ☐ 3. VALIDITY OR INFRINGEMENT OF THE SAME PATENT, COPYRIGHT OR TRADEMARK INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
- ☐ 4. APPEALS ARISING OUT OF THE SAME BANKRUPTCY CASE AND ANY CASE RELATED THERETO WHICH HAVE BEEN DECIDED BY THE SAME BANKRUPTCY JUDGE.
- ☐ 5. REPETITIVE CASES FILED BY PRO SE LITIGANTS.
- ☐ 6. COMPANION OR RELATED CASE TO CASE(S) BEING SIMULTANEOUSLY FILED (INCLUDE ABBREVIATED STYLE OF OTHER CASE(S)):

☐ 7. EITHER SAME OR ALL OF THE PARTIES AND ISSUES IN THIS CASE WERE PREVIOUSLY INVOLVED IN CASE NO. _____, WHICH WAS DISMISSED. This case ☐ IS ☐ IS NOT (check one box) SUBSTANTIALLY THE SAME CASE.

/s/ Moshe Boroosan

09/30/2025

SIGNATURE OF ATTORNEY OF RECORD

DATE

12/10

