

Exhibit A

GLENN M. ROSS, P.C.

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Glenn M. Ross
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September 29, 2016

Cassandra Baker
4449 Bancroft Street
Philadelphia, PA 19140

RE: 4449 Bancroft St

Please be advised that I represent the owner of the premises in which you currently reside.

Your right to possession under the lease has been terminated for your failure to pay rental. There is a balance due of \$2,300.00 which includes unpaid rent, late fees and legal fees. Pursuant to the above, you must vacate the premises and deliver possession to the owner ten (10) days from the date of this letter.

In addition, your lease is hereby terminated because you have breached its terms and conditions in that you have been chronically delinquent and/or late in the payment of rent.

You are responsible for the payment of rent under the lease until the end of its current term, or until the date the premises are re-rented. In addition, you are responsible for the payment of any expenses my client may incur in connection with the attempted re-rental of this unit, including but not limited to rental commission, and any and all physical damage to the unit which may have been caused during the period of your tenancy.

Unless I hear from you to the contrary, I shall assume that you admit the amount and validity of this debt and the accuracy of the contents of this letter.

Very truly yours,



GLENN M. ROSS
GMR/lcp
cc: Owner

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STATEMENT OF AMOUNTS DUE

Unpaid prior rent balance	\$ 900.00
September rent	850.00
September late fee	50.00
Legal fees	500.00
<u>TOTAL BALANCE DUE:</u>	<u>\$ 2,300.00</u>

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NOTICE
PURSUANT TO THE FAIR DEBT COLLECTIONS ACT

1. The amount of the original debt as of the date of the Notice of Unpaid Rental Charges is set forth in the notice to which this document is attached.
2. Claimant/Creditor who is identified in the Notice of Unpaid Rental Charges is the Creditor to whom the debt is owed.
3. Unless you notify this office within thirty (30) days after receiving this notice that you dispute the validity of the debt or any portion thereof, this office will assume this debt is valid.
4. If you notify this office in writing within thirty (30) days from receiving this notice, this office will obtain verification of the debt and mail it to you.
5. If you request this office in writing within thirty (30) days from receiving this notice, this office will provide you with the name and address of the original creditor, if different from the current creditor.

THIS IS AN ATTEMPT TO COLLECT A DEBT;
AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

Exhibit B



**PHILADELPHIA MUNICIPAL COURT
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA**

1339 Chestnut Street, 10th Floor, Philadelphia, PA 19107
Marsha H. Neifield, President Judge Patricia R. McDermott, Deputy Court Administrator

LANDLORD AND TENANT COMPLAINT

Date Filed: 10/12/2016

LT-16-10-12-4210

MICHELLE BUCKNER
59009 CASTOR AVENUE
PHILADELPHIA, PA 19149

Plaintiff(s)

CASSANDRA BAKER, AKA/DBA: AND ALL OCCS
4449 N. BANCROFT STREET
PHILADELPHIA, PA 19140

Defendant(s)

- I.** Plaintiff states that he/she/it owns the real property located at the following address: **4449 N. BANCROFT STREET, PHILADELPHIA, PA 19140**. Plaintiff further states that there is a lease between him/her/it and the above-referenced defendant(s). The lease is **written, attached** and began on **12/01/2014** for the term of **a year or more**. Additionally, plaintiff states that the lease is **residential**.
- II.** Plaintiff states that he/she/it is **in compliance** with Section 102.1 of the Philadelphia Property Maintenance Code by having a valid housing inspection license at the time of filing. **A copy of the license is attached.**
- IV.** Plaintiff states that the subject premises is **fit** for its intended purpose.
- V.** Plaintiff states that notice to vacate the subject premises by **10/09/2016** was given to the defendant on **09/29/2016**. A copy of the notice is attached.
- VI.** The defendant is **in possession of the property and refuses to surrender possession of the property**.
- VII.** Plaintiff demands **a judgment of possession** and a **money judgment** in the amount itemized below based on Non Payment of amounts due under the lease.

The amount of unpaid rent below and late fees alleged due.				Summarized alleged amounts due:	
Month	Year	Rent	Late Fee	Rent	\$1,700.00
AUG 2016	RENT	\$850.00	LATE FEE \$50.00	Late Fees	\$100.00
SEP 2016	RENT	\$850.00	LATE FEE \$50.00	Gas	\$0.00
				Electric	\$0.00
				Water / Sewer	\$0.00
				Attorney's Fees	\$500.00
				Other	\$20.00
				SERVICE FEE	\$20.00
				Subtotal	\$2,320.00
				Court Costs	\$90.00
				Total	\$2,410.00

ONGOING RENT IN THE AMOUNT OF **\$850.00** FROM THE DATE OF THE FILING OF THIS COMPLAINT TO THE DATE OF THE HEARING ON THE MERITS IN THIS MATTER.

Breach of a condition(s) of the lease other than nonpayment of rent. The conditions allegedly breached were:
CHRONICALLY DELINQUENT AND/OR LATE

Filing Party: GLENN M ROSS 566 SOUTH BETHLEHEM PIKE, FORT WASHINGTON, PA 19034		Phone Number: 215 643-7200
I am an attorney for the plaintiff(s), the plaintiff's authorized representative or have a power of attorney for the plaintiff(s) in this landlord tenant action. I hereby verify that I am authorized to make this verification; that I have sufficient knowledge, information and belief to take this verification or have gained sufficient knowledge, information and belief from communications with the plaintiff or the persons listed below and that the facts set forth are true and correct to the best of my knowledge, information and belief. I understand that this verification is made subject to the penalties set forth in 18 Pa. C.S. § 4904, which concerns the making of unsworn falsifications to authorities. If I am an authorized representative or have a power of attorney, I have attached a completed Philadelphia Municipal Court authorized representative form or a completed power of attorney form. GLENN M ROSS _____ Signature Plaintiff/Attorney	SUMMONS TO THE DEFENDANT: You are hereby ordered to appear at a hearing scheduled as follows: LOCATION (SITO): 1339 Chestnut Street 6th Floor Philadelphia, PA 19107 Hearing Room: 3	CITATION: Al demandado por la presente, usted esta dirigido a presentarse a la siguiente: DATE (FECHA): November 10th, 2016 TIME (HORA): 12:45 PM
	NOTICE TO THE DEFENDANT: YOU HAVE BEEN SUED IN COURT. PLEASE SEE ATTACHED NOTICE.	