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PORTFOLIO RECOVERY ASSOCIATES

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8 **SUPERIOR COURT OF CALIFORNIA**  
9 **COUNTY OF LOS ANGELES, DIVISION**

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11 **PORTFOLIO RECOVERY ASSOCIATES,**

Case No. 08C

12 Plaintiff,

**NOTICE OF MOTION AND MOTION FOR  
SUMMARY JUDGMENT IN FAVOR OF  
PLAINTIFF PORTFOLIO RECOVERY  
ASSOCIATES**

13 v.

Date: 2009  
Time: 8:30 AM  
Dept.:

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16 **PAUL**  
and DOES 1 through 15 inclusive.

17 Defendant.  
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20 **TO ALL PARTIES AND ATTORNEYS OF RECORD IN THIS ACTION:**

21 **NOTICE IS HEREBY GIVEN** that on \_\_\_\_\_, 2009, at 8:30 AM or as soon thereafter as the  
22 matter can be heard, in Department \_\_\_\_\_ of the above-entitled court, Plaintiff Portfolio Recovery  
23 Associates ("Plaintiff Portfolio"), will move this Court for Summary Judgment in favor of Plaintiff  
24 Portfolio and against Defendant Paul \_\_\_\_\_ ("Defendant \_\_\_\_\_")

25 This motion will be made on the ground that there are no disputed issues of material fact.  
26 Defendant \_\_\_\_\_'s answer does not have merit, and Plaintiff Portfolio is entitled to Judgment as a matter  
27 of law.

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**NOTICE OF MOTION AND MOTION FOR SUMMARY JUDGMENT**

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PLEASE TAKE FURTHER NOTICE, that this motion is based on this Notice, the accompanying Memorandum of Points and Authorities, Separate Statement of Undisputed Facts and the Declaration of Plaintiff's agent, filed concurrently herewith, the records on file in this action, and on such evidence as may be presented.

Respectfully submitted,  
**PATENAUDE & FELIX, A.P.C.**

Dated:           , 2009

By: \_\_\_\_\_  
Attorneys for Plaintiff  
Portfolio Recovery Associates

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