



the envelope for the public to observe who views the envelope. See Exhibit A.

14. Approximately one month before the above described collection letter was sent out, Defendant sent a collection letter to Plaintiff that did not include the Plaintiff's account number on the envelope. See Exhibit B.

Through some inexplicable oversight Sampson's court filing included neither Ex. A nor Ex. B -- instead Dkt. 1 comprises only the 3-page text of the Complaint itself. But because the delivery to this Court's chambers did include those exhibits, they are attached to and made a part of this memorandum order.

It takes only a quick look at those two exhibits to see that the Complaint is a bad joke -- a joke because the claims are so patently absurd, and a bad one because \$400 has been wasted on a filing fee. In order for any hypothetical member of the public "who views the envelope" (as Complaint ¶ 13 puts it) that is depicted in Ex. A to be able to perceive that debt collection is involved and is at issue, so that MRS BPO assertedly "used unfair and unconscionable means to collect a debt" (Section 1692f, cited in Complaint ¶ 16) or "engaged in conduct likely to oppress, harass or abuse in connection with the collection of a debt" (Section 1692d, cited in Complaint ¶ 17), that member of the public would have to be blessed (or cursed?) with x-ray vision that enabled him or her to read the letter contained in the sealed and assertedly offending envelope. Absent that, any deciphering of the impenetrable string of numbers and symbols on the outside of the Ex. A envelope would have to depend on some sort of divination.

That is simply not the stuff of which any legitimate invocation of the Act or its constructive purposes can be fashioned. If there are indeed (1) any "unfair and unconscionable means to collect a debt" (that is, a debt that would be created by any imposition of damages in this lawsuit) or (2) any "abuse in connection with the collection of a debt" (the latter term being

used in the same sense) in this case, those statutory sins have been committed by Sampson's counsel and not by MRS BPO.

Accordingly, in the exercise of its power under Fed. R. Civ. P. ("Rule") 12(f), this Court strikes the entire Complaint and dismisses this action. Under the circumstances Sampson's counsel is ordered to appear in court at 9 a.m. March 30, 2015 to explain how his filing of the Complaint even arguably complied with the requirements of subjective and objective good faith mandated by Rule 11(b).

A handwritten signature in black ink, reading "Milton I. Shadur". The signature is fluid and cursive, with the first name "Milton" being more prominent.

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Milton I. Shadur  
Senior United States District Judge

Date: March 17, 2015

Return Address:  
MRS BPO, L.L.C.  
1930 OLNEY AVENUE  
CHERRY HILL NJ 08003



PRESORT  
FIRST-CLASS  
U.S. POSTAGE &  
FEES PAID  
HOV SERVICES

S-SFMRSA11 L-STL002WTT A-LU4.2088707.4129641  
P49UVF00304599 - 054810138 104600  
KAREN S SAMPSON  
1376 WILLIAMSBURG DR UNIT C2  
SCHAUMBURG IL 60193-1930

(A)



Send Payment/Correspondence to:  
MRS Associates of New Jersey  
1930 Olney Ave.  
Cherry Hill, NJ 08003  
800-949-3208

**Office Hours:**

Monday - Thursday 9am - 9pm ET  
Friday 9am - 8pm ET

RE: CHASE BANK USA N.A.  
MRS ACCT#: LU4.2088707.4129641  
CLIENT ACCT#: xxxxxxxxxxxx3398  
**ACCOUNT BALANCE : \$7,940.66**

March 2, 2015

Dear KAREN S SAMPSON,

We recognize that a possible hardship or pitfall may have prevented you from satisfying your obligation. We are presenting three options that will enable you to avoid further collection activity being taken against you. We are not obligated to renew this offer.

Option 1: You pay only \$2,779.24 in ONE PAYMENT that must be received in this office on or before 03/20/2015.

Option 2: You make TWO PAYMENTS of \$1,985.17 each. The first payment must be received in this office on or before 03/20/2015 and the second payment on or before 04/24/2015.

Option 3: A monthly payment plan on the full balance of the account.

Payment may be made by calling 800-949-3208, mailing to the above address or by using our online payment website at <https://mrspay.webview.com> (internet connection required). If you have any questions or wish to discuss other arrangements, you may contact us.

When you call please let our representative know that you have received the CHASE BANK USA N.A. Option Letter.

Sincerely,

MRS Associates of New Jersey  
800-949-3208

MRS Associates of New Jersey is a trade name of MRS BPO, L.L.C.

Tax time is a great time to put issues like this behind you. Consider using your tax refund to satisfy your outstanding obligation.

IRS requires certain amounts that are discharged as a result of the cancellation of debt to be reported on a Form 1099-C. You will receive a copy of Form 1099-C if one is required to be filed with the IRS.

Chase wants you to know that this debt settlement may affect your ability to open a new account or borrow money from Chase in the future. In most cases, Chase does not approve applications from customers who haven't paid the account balance back in full—even when an agreement is made for a partial payment to satisfy a debt.

This is an attempt to collect a debt and any information obtained will be used for that purpose.  
This communication is from a debt collector.

Exhibit A



Return Address :  
MRS BPO, L.L.C.  
1930 OLNEY AVENUE  
CHERRY HILL NJ 08003



PRESORT  
FIRST-CLASS  
U.S. POSTAGE &  
FEES PAID  
HOV SERVICES



S-SFMRSA11 L-STL002wWP  
P47B8Z00213057 - 050117309 I13058  
KAREN S SAMPSON  
1376 WILLIAMSBURG DR UNIT C2  
SCHAUMBURG IL 60193-1930



Send Payment/Correspondence to:  
MRS Associates of New Jersey  
1930 Olney Ave.  
Cherry Hill, NJ 08003  
800-949-3208

**Office Hours :**

Monday - Thursday 9am - 9pm ET  
Friday 9am - 8pm ET

RE: CHASE BANK USA N.A.

CLIENT ACCT#: xxxxxxxxxxx3398

MRS ACCT#: LU4.2088707 Use only bold numbers when calling

**ACCOUNT BALANCE : \$7,940.66**

February 2, 2015

Dear KAREN S SAMPSON,

We recognize that a possible hardship or pitfall may have prevented you from satisfying your obligation. We are presenting three options that will enable you to avoid further collection activity being taken against you. We are not obligated to renew this offer.

Option 1: You pay only \$2,779.24 in ONE PAYMENT that must be received in this office on or before 02/20/2015.

Option 2: You make TWO PAYMENTS of \$1,786.65 each. The first payment must be received in this office on or before 02/20/2015 and the second payment on or before 03/20/2015.

Option 3: A monthly payment plan on the full balance of the account.

Payment may be made by calling 800-949-3208, mailing to the above address or by using our online payment website at <https://mrspay.webview.com> (internet connection required). If you have any questions or wish to discuss other arrangements, you may contact us.

When you call please let our representative know that you have received the CHASE BANK USA N.A. Option Letter.

Sincerely,

MRS Associates of New Jersey  
800-949-3208

MRS Associates of New Jersey is a trade name of MRS BPO, L.L.C.  
LU4.2088707.4039449

IRS requires certain amounts that are discharged as a result of the cancellation of debt to be reported on a Form 1099-C. You will receive a copy of Form 1099-C if one is required to be filed with the IRS.

Chase wants you to know that this debt settlement may affect your ability to open a new account or borrow money from Chase in the future. In most cases, Chase does not approve applications from customers who haven't paid the account balance back in full—even when an agreement is made for a partial payment to satisfy a debt.

This is an attempt to collect a debt and any information obtained will be used for that purpose.  
This communication is from a debt collector.

Exhibit B