

IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT
IN AND FOR ORANGE COUNTY, FLORIDA

MEGALENDER PORTFOLIO SERVICES,
LLC,

Plaintiff,

vs.

Case No.

DAVID DEBTOR; DEBBIE DEBTOR;
NEIGHBORHOOD HOMEOWNERS'
ASSOCIATION, INC.; UNKNOWN
TENANT 1; and UNKNOWN TENANT 2,

Defendants.

COMPLAINT

NOTICE TO HOMEOWNER

You are in danger of losing your home.

You should carefully read both the summons and complaint and immediately contact an attorney to obtain advice on how to protect yourself and your home. If you cannot afford to hire an attorney, you may qualify for free legal assistance through your local legal aid organization.

Under certain circumstances, the U.S. Bankruptcy Code may provide relief from foreclosure. If you qualify for such relief, filing a chapter 13 bankruptcy petition may stay a foreclosure proceeding and allow you to (i) construct a repayment plan that provides for payment of mortgage arrears over the life of the plan, while maintaining current mortgage payments as they become due, or (ii) propose mortgage modification mediation. Please note, however, that filing a bankruptcy petition for the sole purpose of staying a foreclosure, without a good faith intent to construct and fund a repayment plan, may result in sanctions.

The state encourages you to investigate all of your options in foreclosure, including contacting your lender about loss mitigation programs that may be available to you. There are also government agencies and non-profit organizations that provide educational resources, including tips on trying to negotiate with your lender during the foreclosure process. For more information about such entities, please visit the consumer protection resources on the website of the Florida Attorney General.

Mortgage foreclosure is a complex process, and homeowners in foreclosure are often targeted by scams. You should be very careful of any unsolicited offers to “save” your home. If you believe that you may be a victim of a scam involving your home, please contact the Office of the Attorney General or the Office of Financial Regulation’s Bureau of Financial Investigations.

COMPLAINT

Plaintiff, MEGALENDER PORTFOLIO SERVICES, LLC (“Lender”), by and through its undersigned counsel, sues the Defendants, DAVID DEBTOR; DEBBIE DEBTOR; NEIGHBORHOOD HOMEOWNERS’ ASSOCIATION, INC.; UNKNOWN TENANT 1; and UNKNOWN TENANT 2, and states: