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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ROMMEL AMANSEC,
*on behalf of himself and those similarly
situated,*

Plaintiff,

v.

MIDLAND CREDIT MANAGEMENT,
INC.,

Defendant.

Case No. 2:15-cv-08798-SDW-LDW

**PLAINTIFF'S NOTICE OF
MOTION FOR CLASS
CERTIFICATION**

**[ORAL ARGUMENT
REQUESTED]**

PLEASE TAKE NOTICE that on April 5, 2021, at 10:00 a.m. or such other time as counsel may be heard, in Courtroom 5C, at the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, which is located at 50 Walnut Street, Newark, New Jersey 07102, Plaintiff, Rommel

Amansec, by and through his undersigned counsel, will move this Honorable Court for an Order certifying this case to proceed as a class action pursuant to Federal Rule of Civil Procedure 23.

PLEASE TAKE FURTHER NOTICE, the grounds supporting class certification are further explained and supported by the accompanying brief, the declarations of Rommel Amansec, Yongmoon Kim and Scott C. Borison, and exhibits thereto, the documents and pleadings on file with the Court, and any oral argument the Court may allow by Plaintiff's counsel regarding this motion.

Respectfully submitted,

KIM LAW FIRM LLC

s/Yongmoon Kim
Yongmoon Kim

Dated: March 6, 2021