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SM LAW, P.C.
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Attorney for Plaintiff

SM FINANCIAL SERVICES CORPORATION

Plaintiff,

v.

LAWRENCE VICKERS and ANAYA VICKERS

Defendant.

:
: SUPERIOR COURT OF NEW JERSEY
: LAW DIVISION: HUNTERDON
: COUNTY
:
: Docket No. 88-19
:
: Civil Action
:
:
: **AMENDED COMPLAINT**

SM Financial Services Corporation (the "Plaintiff"), by and through its undersigned counsel, SM Law PC, located at P.O. Box 530, Oldwick, New Jersey, 08858, by way of Complaint against Lawrence Vickers and Anaya Vickers (the "Defendants") says:

FACTS

1. On or about May 5, 2011, Defendants executed and delivered to Pro Player Funding LLC, a certain promissory note (the "Note") evidenced by, inter alia, a certain Security Agreement and Promissory Note (collectively, the "Promissory Note"), which Defendants promised to pay Pro Playing Funding LLC the principal amount of \$681,320.89, with interest at the rate of twenty percent (20%) per annum. Plaintiff, SM Financial Services Corporation is the present holder of the Note.

2. In addition, the Defendant executed, inter alia, an Affidavit of Confession of Judgment on May 11, 2011 in the principal amount of \$681,320.89, plus accrued interest, in connection with the Promissory Note.

3. Defendants are in default under the Promissory Note and, as of December 7, 2018, owes the amount of \$687,018.23.

4. Payment has been demanded and has not been made.

**Count I
(Breach of Promissory Note)**

5. Plaintiff repeats the allegations of the previous paragraphs as if set forth at length.

6. The Promissory Note signed by the Defendants is a valid, enforceable and binding contract.

7. Plaintiff performed its obligations under the Promissory Note with Defendants.

8. Defendants did not perform its obligations under the Promissory Note and, as a result, Plaintiff has been damaged in the amount of \$687,018.23, plus contractual interest, costs and attorneys' fees.

WHEREFORE, Plaintiff demands judgment against the Defendants in the sum of \$687,018.23, together with lawful interest and costs of this suit.

SM LAW, P.C.

Dated: April 8, 2019

By: 

STEVEN MITNICK, ESQ.
Attorney for Plaintiff

CERTIFICATION PURSUANT TO R. 4:5-1

I certify that the matter in controversy is not the subject of any other action or arbitration proceeding, now or contemplated, and that no other parties should be joined in this action.
R.4:5-1.

SM LAW, P.C.

Dated: April 8, 2019

By: 

STEVEN MITNICK, ESQ.
Attorney for Plaintiff

CERTIFICATION

I certify that confidential personal identifiers have been redacted from documents now submitted to the Court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).

SM LAW, P.C.

Dated: April 8, 2019

By: 

STEVEN MITNICK, ESQ.
Attorney for Plaintiff