

U.S. DISTRICT COURT
DISTRICT OF MARYLAND

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)

2017 JUN 28 PM 2:37

CLERK OF COURT
AT BALTIMORE

LORENZA EVANS,
7617 Fontainebleau Drive, Suite 2142
New Carrollton, MD 20784

*
*

BY _____ DEPUTY

*On Behalf of Class of Similarly
Situated Persons*

*

Plaintiff

*

ELH 17 CV 1784

v.

*

Civil Action No.: _____

BILL ME LATER, INC. D/B/A
PAYPAL CREDIT
9690 Deereco Road, Suite 110
Timonium, MD 21093

*
*
*

Defendant

* * * * *

NOTICE OF REMOVAL

Defendant Bill Me Later, Inc. ("Defendant"), pursuant to 28 U.S.C. §§ 1332, 1441, 1446 and 1453, hereby removes the action entitled *Lorenza Evans v. Bill Me Later, Inc. d/b/a Paypal Credit*, Case No. 24C17002898, filed in the Circuit Court for Baltimore City, Maryland. As grounds for removal, Defendant states as follows:

1. This action was commenced by plaintiff Lorenza Evans ("Plaintiff") on May 18, 2017 by the filing of a putative class action in the Circuit Court for Baltimore City, Maryland. A copy of the complaint is attached as **Exhibit A**. A copy of all other papers filed in the state court case is attached as **Exhibit B**. The Complaint was served on Defendant on May 30, 2017. This notice is therefore timely, as it is filed within 30 days after service of process.

2. The complaint seeks to certify a plaintiff class comprised of:

All persons contacted directly or indirectly by PayPal Credit for the purpose of arranging an extension of credit for them with Comenity Capital Bank for consumer purposes.

Complaint ¶ 42. No class period is specified, although Plaintiff seems to allege that any applicable statute of limitations has been tolled. *See id.* ¶ 79.

3. The complaint asserts claims under Maryland law based on Defendant's allegedly unlawful facilitation of consumer credit through non-party Comenity Capital Bank ("Comenity"). The complaint includes claims for (1) violations of the Maryland Credit Services Business Act ("MCSBA"), (2) violations of the Maryland Consumer Protection Act ("MCPA"), (3) unjust enrichment, and (4) money had and received.

4. With respect to Plaintiff's claims under the MCSBA and MCPA, the complaint requests "a sum in excess of \$75,000.00 which represents [the putative class members'] compensatory damages and losses." Complaint ¶ 68(B). The complaint also requests punitive damages for alleged "willful and knowing violations of Maryland law[.]" *Id.* ¶ 68(C). Finally, it requests attorney's fees incurred in connection with these two claims. *Id.* ¶ 68(D).

5. With respect to Plaintiff's claim for unjust enrichment, the complaint requests that the court "[g]rant a money judgment and order the Defendant to disgorge and pay to the Class all payments and consideration and interest it has collected, and profits realized there from, in a sum in excess of \$75,000.00, from the Class members and Named Plaintiff related to the credit services business activities it engaged [sic] without the right to do so." *Id.* ¶ 84(b). The complaint also requests attorney's fees in connection with this claim. *Id.* ¶ 84(c).

6. With respect to Plaintiff's claim for money had and received, the complaint similarly requests that the court "[g]rant a money judgment and order the Defendant to disgorge and pay to the Class all payments and consideration and interest, and profits there from, it has

collected in a sum in excess of \$75,000.00, from the Class members and Named Plaintiff related to the credit services business activities it engaged [sic] without the right to do so.” *Id.* ¶ 94(b). The complaint also requests attorney’s fees in connection with this claim. *Id.* ¶ 94(c).

7. The complaint states that the proposed class “exceed[s] more than [sic] a hundred persons[.]” *Id.* ¶ 45.

8. The basis for removal of this action is the jurisdiction conferred by the Class Action Fairness Act of 2005 (“CAFA”), 28 U.S.C. §§ 1332(d)(2) and 1453.

9. CAFA vests the district courts with original jurisdiction over all class actions in which: (a) any member of a class of plaintiffs is a citizen of a State different from any defendant; (b) the number of proposed class members is 100 or more; and (c) the amount in controversy exceeds \$5,000,000 in the aggregate, exclusive of interest and costs. *See* 28 U.S.C. § 1332(d)(2). This case meets all of these requirements.

10. First, there are members of the proposed class who are citizens of a different state than Defendant. Defendant is a corporation organized under the laws of Delaware with its principal place of business in Maryland. The proposed class includes “[a]ll persons contacted directly or indirectly by PayPal Credit for the purpose of arranging an extension of credit for them with Comenity Capital Bank for consumer purposes.” Complaint ¶ 42. Defendant and Comenity are both large companies doing business nationwide. The proposed class includes members who are citizens of states other than Maryland and Delaware.

11. Second, there are more than 100 members in the proposed class. The complaint specifically alleges that the class includes “more than a hundred persons[.]” *Id.* ¶ 45.

12. Third, the amount in controversy exceeds \$5,000,000 in the aggregate, exclusive of interest and costs. Among other things, the complaint asks the court to award a judgment that

would require Defendant to return all sums that it has collected from each member of the putative class. Specifically, in its prayer for relief, the complaint requests that the court “order the Defendant to disgorge and pay to the Class all payments and consideration and interest it has collected, and profits realized there from, in a sum in excess of \$75,000.00, from the Class members and Named Plaintiff related to the credit services business activities it engaged [sic] without the right to do so.” *Id.* ¶ 84(b). The sum demanded by Plaintiff on behalf of the putative class is well in excess of \$5,000,000.

13. Fewer than one-third of the members of the proposed class are citizens of Maryland.

14. Defendant expressly denies liability and expressly denies that Plaintiff or any member of the putative class has suffered any damage for which Defendant is responsible on account of the conduct alleged in the complaint.

15. Venue is proper in this Court pursuant to 28 U.S.C. §§ 100 and 1441(a) because the District of Maryland is the federal judicial district embracing the Circuit Court of Maryland for Baltimore City, the court in which this action was originally filed.

16. A copy of this Notice will be served upon Plaintiff as required by 28 U.S.C. § 1446(d).

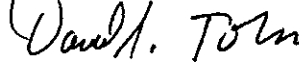
17. A notification of the filing this Notice of Removal will be filed with the Circuit Court of Maryland for Baltimore City promptly after the filing of this Notice of Removal, in accordance with 28 U.S.C. § 1446(d), and is attached hereto as **Exhibit C**.

18. In removing this action to federal court, Defendant expressly reserves, and does not waive, any and all rights and defenses it has or may have.

WHEREFORE, notice is hereby given that this action is removed from the Circuit Court of Maryland for Baltimore City to the United States District Court for the District of Maryland.

June 28, 2017

Respectfully submitted,



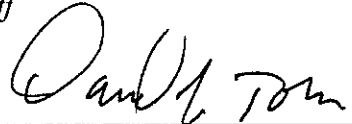
Daniel J. Tobin (Bar. No. 10338)
Ballard Spahr LLP
1909 K Street NW – 12th Floor
Washington, D.C. 20006
Telephone: (202) 661-2200
Facsimile: (202)-661-2299
tobindj@ballardspahr.com
Attorneys for Bill Me Later, Inc. d/b/a Paypal Credit

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 28th day of June, 2017, a copy of the foregoing was served via first-class mail, postage prepaid, upon:

Phillip R. Robinson
Consumer Law Center LLC
8737 Colesville Road, Suite 308
Silver Spring, MD 20910

Attorneys for Plaintiff



Daniel J. Tobin

DMEAST #29841209 v4

JS 44 (Rev. 07/16)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

<p>I. (a) PLAINTIFFS LORENZA EVANS</p> <p>(b) County of Residence of First Listed Plaintiff <u>Prince George's</u> <i>(EXCEPT IN U.S. PLAINTIFF CASES)</i></p> <p>(c) Attorneys <i>(Firm Name, Address, and Telephone Number)</i> Phillip R. Robinson Consumer Law Center LLC 8737 Colesville Road, Suite 308, Silver Spring, MD 20910</p>	<p>DEFENDANTS BILL ME LATER, INC.</p> <p>County of Residence of First Listed Defendant _____ <i>(IN U.S. PLAINTIFF CASES ONLY)</i></p> <p>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.</p> <p>Attorneys <i>(If Known)</i> Daniel J. Tobin, Ballard Spahr LLP 1909 K Street NW – 12th Floor Washington, D.C. 20006</p>
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ELH 17 CV 1784

<p>II. BASIS OF JURISDICTION <i>(Place an "X" in One Box Only)</i></p> <p><input type="checkbox"/> 1 U.S. Government Plaintiff</p> <p><input type="checkbox"/> 2 U.S. Government Defendant</p> <p><input type="checkbox"/> 3 Federal Question <i>(U.S. Government Not a Party)</i></p> <p><input checked="" type="checkbox"/> 4 Diversity <i>(Indicate Citizenship of Parties in Item III)</i></p>	<p>III. CITIZENSHIP OF PRINCIPAL PARTIES <i>(Place an "X" in One Box for Plaintiff and One Box for Defendant)</i></p> <table style="width:100%; border-collapse: collapse;"> <tr> <td style="width:33%;"></td> <td style="width:33%; text-align: center;">PTF</td> <td style="width:33%; text-align: center;">DEF</td> </tr> <tr> <td>Citizen of This State</td> <td style="text-align: center;"><input checked="" type="checkbox"/> 1</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> </tr> <tr> <td>Incorporated or Principal Place of Business In This State</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td style="text-align: center;"><input checked="" type="checkbox"/> 4</td> </tr> <tr> <td>Incorporated and Principal Place of Business In Another State</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> </tr> <tr> <td>Foreign Nation</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> </tr> </table>		PTF	DEF	Citizen of This State	<input checked="" type="checkbox"/> 1	<input type="checkbox"/> 1	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input checked="" type="checkbox"/> 4	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
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Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5																				
Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				

IV. NATURE OF SUIT *(Place an "X" in One Box Only)*

<p>CONTRACT</p> <p><input type="checkbox"/> 110 Insurance</p> <p><input type="checkbox"/> 120 Marine</p> <p><input type="checkbox"/> 130 Miller Act</p> <p><input type="checkbox"/> 140 Negotiable Instrument</p> <p><input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment</p> <p><input type="checkbox"/> 151 Medicare Act</p> <p><input type="checkbox"/> 152 Recovery of Defaulted Student Loans <i>(Excludes Veterans)</i></p> <p><input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits</p> <p><input type="checkbox"/> 160 Stockholders' Suits</p> <p><input type="checkbox"/> 190 Other Contract</p> <p><input type="checkbox"/> 195 Contract Product Liability</p> <p><input type="checkbox"/> 196 Franchise</p>	<p>TORTS</p> <p>PERSONAL INJURY</p> <p><input type="checkbox"/> 310 Airplane</p> <p><input type="checkbox"/> 315 Airplane Product Liability</p> <p><input type="checkbox"/> 320 Assault, Libel & Slander</p> <p><input type="checkbox"/> 330 Federal Employers' Liability</p> <p><input type="checkbox"/> 340 Marine</p> <p><input type="checkbox"/> 345 Marine Product Liability</p> <p><input type="checkbox"/> 350 Motor Vehicle</p> <p><input type="checkbox"/> 355 Motor Vehicle Product Liability</p> <p><input type="checkbox"/> 360 Other Personal Injury</p> <p><input type="checkbox"/> 362 Personal Injury - Medical Malpractice</p>	<p>PERSONAL INJURY</p> <p><input type="checkbox"/> 365 Personal Injury - Product Liability</p> <p><input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability</p> <p><input type="checkbox"/> 368 Asbestos Personal Injury Product Liability</p> <p>PERSONAL PROPERTY</p> <p><input type="checkbox"/> 370 Other Fraud</p> <p><input type="checkbox"/> 371 Truth in Lending</p> <p><input type="checkbox"/> 380 Other Personal Property Damage</p> <p><input type="checkbox"/> 385 Property Damage Product Liability</p>	<p>FORFEITURE/PENALTY</p> <p><input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881</p> <p><input type="checkbox"/> 690 Other</p> <p>LABOR</p> <p><input type="checkbox"/> 710 Fair Labor Standards Act</p> <p><input type="checkbox"/> 720 Labor/Management Relations</p> <p><input type="checkbox"/> 740 Railway Labor Act</p> <p><input type="checkbox"/> 751 Family and Medical Leave Act</p> <p><input type="checkbox"/> 790 Other Labor Litigation</p> <p><input type="checkbox"/> 791 Employee Retirement Income Security Act</p> <p>IMMIGRATION</p> <p><input type="checkbox"/> 462 Naturalization Application</p> <p><input type="checkbox"/> 465 Other Immigration Actions</p>	<p>BANKRUPTCY</p> <p><input type="checkbox"/> 422 Appeal 28 USC 158</p> <p><input type="checkbox"/> 423 Withdrawal 28 USC 157</p> <p>PROPERTY RIGHTS</p> <p><input type="checkbox"/> 820 Copyrights</p> <p><input type="checkbox"/> 830 Patent</p> <p><input type="checkbox"/> 840 Trademark</p> <p>SOCIAL SECURITY</p> <p><input type="checkbox"/> 861 IIIA (1395ff)</p> <p><input type="checkbox"/> 862 Black Lung (923)</p> <p><input type="checkbox"/> 863 DIWC/DIWW (405(g))</p> <p><input type="checkbox"/> 864 SSID Title XVI</p> <p><input type="checkbox"/> 865 RSI (405(g))</p> <p>FEDERAL TAX SUITS</p> <p><input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)</p> <p><input type="checkbox"/> 871 IRS--Third Party 26 USC 7609</p>	<p>OTHER STATUTES</p> <p><input type="checkbox"/> 375 False Claims Act</p> <p><input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))</p> <p><input type="checkbox"/> 400 State Reapportionment</p> <p><input type="checkbox"/> 410 Antitrust</p> <p><input type="checkbox"/> 430 Banks and Banking</p> <p><input type="checkbox"/> 450 Commerce</p> <p><input type="checkbox"/> 460 Deportation</p> <p><input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations</p> <p><input checked="" type="checkbox"/> 480 Consumer Credit</p> <p><input type="checkbox"/> 490 Cable/Sat TV</p> <p><input type="checkbox"/> 850 Securities/Commodities/Exchange</p> <p><input type="checkbox"/> 890 Other Statutory Actions</p> <p><input type="checkbox"/> 891 Agricultural Acts</p> <p><input type="checkbox"/> 893 Environmental Matters</p> <p><input type="checkbox"/> 895 Freedom of Information Act</p> <p><input type="checkbox"/> 896 Arbitration</p> <p><input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision</p> <p><input type="checkbox"/> 950 Constitutionality of State Statutes</p>
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V. ORIGIN *(Place an "X" in One Box Only)*

1 Original Proceeding 2 Removed from State Court 3 Remanded from Appellate Court 4 Reinstated or Reopened 5 Transferred from Another District *(specify)* 6 Multidistrict Litigation - Transfer 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing *(Do not cite jurisdictional statutes unless diversity):*
28 U.S.C. §§ 1332(d)(2) and 1453

Brief description of cause:
Consumer credit violations

VII. REQUESTED IN COMPLAINT: CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. **DEMAND \$** > 5,000,000.00 CHECK YES only if demanded in complaint: **JURY DEMAND:** Yes No

VIII. RELATED CASE(S) IF ANY *(See instructions):* JUDGE _____ DOCKET NUMBER _____

DATE 06/28/2017 SIGNATURE OF ATTORNEY OF RECORD Daniel J. Tobin (10338)

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

JS 44 Reverse (Rev. 07/16)

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
- United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
- United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
- Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
- Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerk(s) in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.
- V. Origin.** Place an "X" in one of the seven boxes.
- Original Proceedings. (1) Cases which originate in the United States district courts.
- Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.
- Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
- Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
- Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
- Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
- Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
- PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
- Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
- Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.
- Date and Attorney Signature.** Date and sign the civil cover sheet.

Ballard Spahr
LLP

300 East Lombard Street, 18th Floor
Baltimore, MD 21202-3268
TEL 410.528.5600
FAX 410.528.5650
www.ballardspahr.com

2017 JUN 28 PM 2:37
CLERK'S OFFICE
AT BALTIMORE
BY KR DEPUTY

Kimberlee P. Buhrman
Paralegal
Tel: 410.528.5683
Fax: 410.528.5650
buhrmank@ballardspahr.com

June 28, 2017

ELH17 CV1784

BY HAND DELIVERY

Clerk
United States District Court for the District of
Maryland
U.S. Courthouse
101 W. Lombard Street
Baltimore, Maryland 21201

Re: Lorenza Evans v. Bill Me Later, Inc. d/b/a Paypal Credit
NOTICE OF REMOVAL

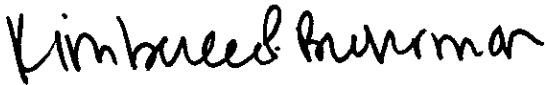
Dear Clerk:

Enclosed for filing in the above-referenced matter are the original and two copies of a Civil Cover Sheet, Notice of Removal with exhibits, along with our firm's check in the amount of \$400.00 for the filing fee. Please distribute one copy to the assigned judge and date-stamp the other copy of the removal papers and return them to the waiting messenger.

Also enclosed is a computer disk containing the Civil Cover Sheet, Notice of Removal, and state court documents in PDF format.

Thank you for your assistance in this matter.

Very truly yours,



Kimberlee P. Buhrman
Paralegal

KPB/

DMEAST #29946598 v1