

JOSIAH KNAPP LAW, PC
 By: Josiah Knapp, Esquire
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 100 South Broad Street, Suite 930
 Philadelphia, PA 19110
 (215) 419-5880


ATTORNEY FOR PLAINTIFF

MARINA DISTRICT DEVELOPMENT CO., LLC T/A BORGATA	Superior Court of New Jersey Atlantic County Law Division
Plaintiff	
v.	
Everett Stern	Docket No.:
Defendant	CIVIL ACTION COMPLAINT

The Plaintiff, Marina District Development Co., LLC t/a Borgata having a principal place of business at One Borgata Way, Atlantic City, NJ 08401 says:

1. Defendant signed a countercheck(s), drawn on defendant's bank and made payable to the Plaintiff in exchange for chips and/or cash, while at the Plaintiff's casino in New Jersey, conferring minimum contacts jurisdiction.
2. The original amount of the above countercheck(s) was \$37,500.00.
3. Said check(s) have been dishonored by the bank upon which they have been drawn, having been deposited within the statutory time period. The last countercheck was dishonored on or about December 17, 2021.
4. Defendant has paid \$3,000.00 against the above counterchecks.
5. There remains owing to the plaintiff the sum of \$34,500.00.
6. Interest is owed on the countercheck(s) from December 17, 2021 at 12% per annum pursuant to the agreement of the Defendant as stated on the check(s).
7. Demand for payment of the balance has gone without heed.
8. I hereby certify that the matter in controversy is not the subject of any other Court proceedings or arbitration and that, to the best of my knowledge and belief, no other parties need to be joined at this time.

WHEREFORE, plaintiff demands judgment for the sum of \$34,500.00 plus accruing interest from December 17, 2021 to the date of judgment at the rate set forth on the dishonored marker(s) plus costs, attorney fees and Statutory penalties in accordance with NJSA 2A:32A-1.


 Josiah Knapp, Esq.
 Attorney for the Plaintiff

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<p>MARINA DISTRICT DEVELOPMENT CO., LLC T/A BORGATA</p> <p style="text-align: center;">Plaintiff</p> <p style="text-align: center;">v.</p> <p>Everett Stern</p> <p style="text-align: center;">Defendant</p>	<p>SUPERIOR COURT OF NEW JERSEY ATLANTIC COUNTY LAW DIVISION</p> <p>Docket No.:</p> <p>Civil Action</p> <p>CERTIFICATION OF DILIGENT INQUIRY</p>
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JOSIAH KNAPP, certifies and says:

1. I am attorney for the above named Plaintiff and am familiar with this account and authorized to make this Certification.
2. After diligent inquiry, the Defendant cannot be served with a Summons or other process in this State as the Defendant's only known address is 890 S. Matlack Street, Apt. 460, West Chester, PA, 19382.
3. I hereby certify that foregoing statements made by me or true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

JOSIAH KNAPP LAW, PC

BY: 
 Josiah Knapp, Esq.
 Attorney for Plaintiff

Dated: January 27, 2023

JOSIAH KNAPP LAW, PC
 By: Josiah Knapp, Esquire
 Attorney ID: 040921990
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ATTORNEY FOR PLAINTIFF

<p>MARINA DISTRICT DEVELOPMENT CO., LLC T/A BORGATA</p> <p style="text-align: right;">Plaintiff</p> <p>v.</p> <p>Everett Stern</p> <p style="text-align: right;">Defendant</p>	<p>Superior Court of New Jersey Atlantic County Law Division</p> <p>Docket No.:</p> <p>CIVIL ACTION SUMMONS</p>
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From The State of New Jersey
 To The Defendant(s) Named Above:

From The State of New Jersey to the Defendant Named Above.

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online [at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf](http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf).) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$175.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment. If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529).

If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.

Date: _____

Clerk of the Superior Court

Name of Defendant to be Served: Everett Stern
Address of Defendant to be served: 890 S. Matlack Street
Apt. 460
West Chester, PA 19382

Revised 11/17/2014, CN 10792-English (Appendix XII-A)

OffshoreAlert

Civil Case Information Statement

Case Details: ATLANTIC | Civil Part Docket# L-000158-23

Case Caption: MDDC T/A BORGATA VS STERN EVERETT

Case Initiation Date: 01/27/2023

Attorney Name: JOSIAH A KNAPP

Firm Name: JOSIAH KNAPP LAW, PC

Address: 100 S. BROAD ST STE 930

PHILADELPHIA PA 19110

Phone: 2154195880

Name of Party: PLAINTIFF : MDDC t/a Borgata

Name of Defendant's Primary Insurance Company
(if known): None

Case Type: BOOK ACCOUNT (DEBT COLLECTION MATTERS ONLY)

Document Type: Complaint

Jury Demand: NONE

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

Does this case involve claims related to COVID-19? NO

Are sexual abuse claims alleged by: MDDC t/a Borgata? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO **Title 59?** NO **Consumer Fraud?** NO

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)*

01/27/2023

Dated

/s/ JOSIAH A KNAPP

Signed