



SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF SCHOHARIE

MIDLAND FUNDING LLC
A/P/O HSBC BANK NEVADA, N.A.
Plaintiff,
-against
JOHN [REDACTED]
Defendant

Index No. [REDACTED]
SETTLEMENT STIPULATION

Account No.: [REDACTED]
Original Account number ending in: [REDACTED]
Original Creditor: HSBC BANK NEVADA, N.A.

IT IS HEREBY STIPULATED AND AGREED, by and between plaintiff's attorneys and defendant(s) and/or defendant's attorney that:

1. Defendant consents to the jurisdiction of this court, withdraws the answer, and waives any and all offsets, defenses and/or counterclaims.
2. Pursuant to CPLR 8020(d), since it is the Defendant's obligation to file within stipulation of settlement, it shall, however, be filed by the Plaintiff at the Defendant's request. The \$35.00 mandatory filing fee shall be paid by the Defendant with his/her initial payment. The Defendant understands that this payment is in addition to his/her initial installment.
3. This action is settled upon the following terms and conditions:

Suit Amount	\$	9,393.24
Less Payments Made	\$.00
Settled For	\$	4,500.00

A. \$4,500.00 to be paid on or before the 31st day of March, 2016.
4. Payments are to be made by check or money order made payable to "Forster & Garbus LLP" as attorneys and sent to them at P.O. Box 9030, Commack, NY 11725-9030.
5. Should any payment not be received by the due date, or should any check be returned by the bank for any reason whatsoever, and the payment not be received within 10 days after written notification to defendant and/or defendant's attorney, plaintiff shall have the right to enter judgment without further notice, for the full suit amount demanded in the complaint, together with cost and disbursements, less any payments made.
6. Upon payment as agreed herein, a stipulation of discontinuance of this action shall be filed with the Court. Pursuant to CPLR 8020(d), it is the Defendant's obligation to file the stipulation of discontinuance and pay the filing fee of \$35.00
7. This stipulation is in settlement of this action only and only against the defendant signing this stipulation.
8. Facsimile signatures shall be deemed original for purposes of this settlement stipulation only.

Our client will report forgiveness of debt as required by IRS regulations.
Dated: March 25, 2016 FORSTER & GARBUS LLP

JOHN [REDACTED]
[REDACTED]
COELESKILL, NY 120435030

By:
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~~KENNETH H. DRAMER
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PLEASE NOTE THAT WE ARE REQUIRED, UNDER FEDERAL LAW, TO ADVISE YOU THAT WE ARE DEBT COLLECTORS AND ANY INFORMATION WE OBTAIN WILL BE USED IN ATTEMPTING TO COLLECT THIS DEBT.