

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF SUFFOLK

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KIDNEYLIFE FOUNDATION INC. DBA
NATIONAL KIDNEY REGISTRY

Plaintiff,

-against-

UNIVERSITY OF MARYLAND MEDICAL CENTER

Defendant.
-----x

Index No.

SUMMONS

Plaintiff's Address:
42 Fire Island Avenue
Babylon, NY 11702

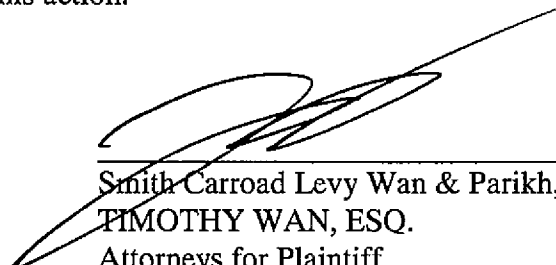
The basis of the venue is that Plaintiff is located in the County.

To the above named Defendant:

YOU ARE HEREBY SUMMONED and required to appear by serving an answer to the annexed Complaint upon Plaintiff's attorney, at the address stated below, or if there is no attorney, upon the Plaintiff, at the address stated above, within the time provided by law as noted below; upon your failure to answer, judgment will be taken against you for the relief demanded in the Complaint, together with the costs of this action.

Dated: March 22, 2018

Defendant's Address:
22 S. Greene Street
Baltimore, MD 21201



Smith Carrod Levy Wan & Parikh, P.C.
TIMOTHY WAN, ESQ.
Attorneys for Plaintiff
5036 Jericho Tpke.
Commack, NY 11725
(631)499-5400

NOTE: The law provides that: (1) If this summons is served by its delivery to you personally within the State of New York, you must answer within 20 days after such service; or (2) If this Summons is served by delivery to any person other than you personally, or is served outside the State of New York, or by publication, or by any means other than personal delivery to you within the State of New York, you are allowed 30 days after service is complete within which to answer.

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF SUFFOLK

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KIDNEYLIFE FOUNDATION INC. DBA
NATIONAL KIDNEY REGISTRY

Index No.

Plaintiff,

-against-

**VERIFIED
COMPLAINT**

UNIVERSITY OF MARYLAND MEDICAL CENTER

Defendant.
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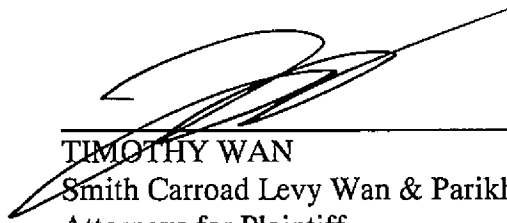
The Plaintiff, by its attorneys, complaining of the Defendant, alleges:

1. Plaintiff KIDNEYLIFE FOUNDATION INC. DBA NATIONAL KIDNEY REGISTRY (hereinafter referred to as "NKR") is a domestic not-for-profit corporation.
2. Upon information and belief, Defendant UNIVERSITY OF MARYLAND MEDICAL CENTER, (hereinafter referred to as "UMM") is a hospital corporation with a primary place of business located at 22 S. Greene Street, Baltimore, MD 21201.
3. Prior hereto, UMM agreed to NKR's Terms and Conditions to be a Member Center.
4. Relevant hereto, UMM was a Member Center for the year 2017 and 2018.
5. The Terms and Conditions provide for an annual membership fee of \$9,500.00.
6. Additionally, pursuant to the 2017 Terms and Conditions, UMM is liable for Database Management and Technology Support - Center Connectivity, at \$4,225.00 per month, and Database Management & Technology Support: Automated Donor Intake (DASH), at \$1,500.00 per month, for a total of \$5,725.00.
7. In February 2018, the Database Management & Technology Support: Automated Donor Intake (DASH), increased to \$2,000.00, making that month's total \$6,225.00.
8. Adding together the three months of invoices in the amount of \$5,725.00, plus \$6,225.00, plus the annual membership fee of \$9,500.00, the sum total is \$32,900.00.
9. UMM failed to make payments in November 2017, December 2017, January 2018, and February 2018, despite being duly demanded via electronic mail.

10. After giving the Defendant credit for all payments and credits there is still due and owing the sum of \$32,900.00. No part of said sum has been paid although payment has been duly demanded.

WHEREFORE, Plaintiff demands judgment against Defendant for the sum of \$32,900.00, with interest thereon from February 28, 2018, together with costs and disbursements of this action.

Dated: March 22, 2018



TIMOTHY WAN
Smith Carroad Levy Wan & Parikh, P.C.
Attorneys for Plaintiff
5036 Jericho Tpke.
Commack, New York 11725
(631) 499-5400

CORPORATE VERIFICATION

STATE OF NEW YORK
COUNTY OF SUFFOLK

GARET HIL, being duly sworn, deposes and says, that deponent is CEO of the Plaintiff herein; has read the foregoing Verified Complaint, and knows the contents thereof; the same is true to deponent's own knowledge, except as to matters stated to be on information and belief, and as to those, deponent believes them to be true.

KIDNEYLIFE FOUNDATION INC, DBA
NATIONAL KIDNEY REGISTRY


BY: GARET HIL

Sworn to before me this
day of _____, 2018



Notary Public

TIMOTHY WAN
NOTARY PUBLIC, STATE OF NEW YORK
NO. 02WA6054436
QUALIFIED IN SUFFOLK COUNTY
COMMISSION EXPIRES 2/5/ 19