

1           **IN THE CIRCUIT COURT OF THE STATE OF OREGON FOR LANE COUNTY**

2 SOUTH WILLAMETTE VETERINARY	)	<b>Case No.</b>
3 CLINIC, LLC, an Oregon Limited	)	
4 Liability Company,	)	
5	)	
6                           Plaintiff,	)	<b>COMPLAINT</b>
7	)	<b>(Open Account - ORS 20.082)</b>
8 v.	)	
9	)	<b>AMT CLAIMED: \$6,532.68</b>
10 MEAGAN GRAVELLE;	)	<b>Fees at ORS 21.160(1)(a)</b>
11 and TIFFANY GRAVELLE,	)	
12	)	
13                           Defendants.	)	
14 _____	)	<b>SUBJECT TO ARBITRATION</b>

15           Plaintiff alleges:

16                                   **FACTS COMMON TO ALL REQUESTS FOR RELIEF**

17   1.

18           At all material times, plaintiff has been, and is now, an  
19 Oregon limited liability company in good standing with the State of  
20 Oregon Corporation Division

21   2.

22           On information and belief and at all material times, defendants  
23 have been, and are now, residents of Lane County, Oregon.

1 \* \* \* \* \*

2 For plaintiff's Request for Relief against defendants,  
3 plaintiff alleges:

4 **REQUEST FOR RELIEF**  
5 **(Open Account - ORS 20.082)**

6 3.

7 Defendants are indebted to plaintiff for the balance of  
8 veterinary care, provided by plaintiff, at defendants' request, on  
9 an open account in the principal amount of \$6,502.28. Details of  
10 the account are set out in the client account history attached  
11 hereto as Exhibit 1, and by this reference incorporated herein.

12 4.

13 Defendants have not paid the above sum, nor any part of it,  
14 despite demand therefore by plaintiff.

15 5.

16 As a direct result of defendants' refusal to pay, plaintiff has  
17 been damaged in the principal sum of \$6,502.28, plus interest  
18 charges on the outstanding balance at Oregon's statutory rate of 9%  
19 per annum, from July 2, 2018, until paid.

20 6.

21 On or about June 4, 2019, more than 20 days before commencement  
22 of this action, plaintiff made written demand upon defendants for  
23 payment, as evidenced by the demand letter attached hereto as  
24 Exhibit 2, and incorporated herein by reference.

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7.

Plaintiff is entitled to recover its reasonable attorney fees incurred herein pursuant to ORS 20.082.

**WHEREFORE**, plaintiff prays for a judgment and money award on plaintiff's Request for Relief, against defendant MEAGAN GRAVELLE, and defendant TIFFANY GRAVELLE, both jointly and severally, and in favor of plaintiff, in the principal sum of \$6,502.28, plus interest charges on the outstanding balance at Oregon's statutory rate of 9% per annum, from July 2, 2018, until paid, together with plaintiff's reasonable attorney fees and costs and disbursements incurred herein; and for such other relief the court deems proper.

DATED this 22 day of July, 2019.

  
Donald R. Slayton, OSB #862898  
Attorney for Plaintiff

# Client Account History

Client ID	13066	Current	30 Days	60 Days	90 Days	Account Balance
Client Name	Gravelle, Meagan & Tiffany	\$715.64	\$6.80	\$0.00	\$5,779.84	\$6,502.28
Date	Transaction Description	Debit	Credit	Balance		
11/3/2017	Invoice #: 198848 - Closed	\$390.00	\$0.00	\$390.00		
11/3/2017	Payment: Check, Check # 3064	\$0.00	\$390.00	\$0.00		
11/4/2017	Invoice #: 199006 - Closed	\$244.00	\$0.00	\$244.00		
11/13/2017	Invoice #: 199159 - Closed	\$246.00	\$0.00	\$490.00		
11/13/2017	Account Comment: CALLED 214-592-2786: L/M TO C/B	\$0.00	\$0.00	\$490.00		
11/15/2017	Account Comment: SENT STATEMENT REQUESTING PAYMENT	\$0.00	\$0.00	\$490.00		
1/2/2018	EOM: Finance Charge	\$7.35	\$0.00	\$497.35		
1/31/2018	Invoice #: 10002186 - Closed	\$442.00	\$0.00	\$939.35		
2/1/2018	Payment: Check, Check # 211	\$0.00	\$442.00	\$497.35		
2/2/2018	Invoice #: 201977 - Closed	\$81.25	\$0.00	\$578.60		
2/2/2018	EOM: Finance Charge	\$2.00	\$0.00	\$580.60		
2/5/2018	Account Comment: STMT: CARE CREDIT	\$0.00	\$0.00	\$580.60		
2/6/2018	Invoice #: 201891 - Closed	\$116.00	\$0.00	\$696.60		
2/6/2018	Payment: Check, Check # 1145	\$0.00	\$116.00	\$580.60		
2/8/2018	Invoice #: 202328 - Closed	\$965.90	\$0.00	\$1,546.50		
2/12/2018	Account Comment: CHECK BOOK STOLEN: MAY HAVE NSF. MEGAN WILL CALL WITH UPDATE	\$0.00	\$0.00	\$1,546.50		
2/14/2018	Returned Check#: 211	\$442.00	\$0.00	\$1,988.50		
2/14/2018	Returned Check#: 1145	\$116.00	\$0.00	\$2,104.50		
2/16/2018	Invoice #: 202381 - Closed	\$547.75	\$0.00	\$2,652.25		
2/16/2018	Account Comment: CALL TIFFANY 972-342-5921: L/M TO C/B	\$0.00	\$0.00	\$2,652.25		
2/16/2018	Account Comment: MEGAN CALLED: MOM HAS \$\$\$ PLAN, WILL EMAIL ME. HAVING PROBLEMS WITH HER PHONE	\$0.00	\$0.00	\$2,652.25		
2/18/2018	Invoice #: 202379 - Closed	\$927.64	\$0.00	\$3,579.89		
2/19/2018	Payment: Visa/Master Card, APP# 155161	\$0.00	\$1,500.00	\$2,079.89		
2/19/2018	Account Comment: TIFFANY WILL CALL WEDNESDAY WITH MORE \$\$\$	\$0.00	\$0.00	\$2,079.89		
3/1/2018	Invoice #: 203841 - Closed	\$65.00	\$0.00	\$2,144.89		
3/1/2018	Invoice #: 203842 - Closed	\$68.00	\$0.00	\$2,212.89		
3/1/2018	Invoice #: 203848 - Closed	\$68.00	\$0.00	\$2,280.89		
3/1/2018	Invoice #: 203853 - Closed	\$68.00	\$0.00	\$2,348.89		
3/1/2018	Payment: Visa/Master Card, APP# 110917	\$0.00	\$1,000.00	\$1,348.89		
3/2/2018	Payment: Visa/Master Card, APP# 140393	\$0.00	\$1,079.89	\$269.00		
3/5/2018	Invoice #: 204104 - Closed	\$58.75	\$0.00	\$327.75		
3/9/2018	Invoice #: 10002217 - Closed	\$469.00	\$0.00	\$796.75		
3/12/2018	Invoice #: 203849 - Closed	\$130.00	\$0.00	\$926.75		
3/12/2018	Invoice #: 203854 - Closed	\$55.00	\$0.00	\$981.75		
3/14/2018	Invoice #: 203851 - Closed	\$130.00	\$0.00	\$1,111.75		
3/14/2018	Invoice #: 203855 - Closed	\$77.00	\$0.00	\$1,188.75		
3/16/2018	Invoice #: 203852 - Closed	\$130.00	\$0.00	\$1,318.75		
3/16/2018	Invoice #: 203856 - Closed	\$55.00	\$0.00	\$1,373.75		
3/17/2018	Invoice #: 205094 - Closed	\$106.00	\$0.00	\$1,479.75		
3/19/2018	Invoice #: 203442 - Closed	\$55.00	\$0.00	\$1,534.75		
3/21/2018	Invoice #: 10002232 - Closed	\$780.00	\$0.00	\$2,314.75		
3/22/2018	Invoice #: 203792 - Closed	\$330.00	\$0.00	\$2,644.75		
3/30/2018	Invoice #: 203668 - Closed	\$75.50	\$0.00	\$2,720.25		
3/30/2018	Payment: Visa/Master Card, APP# 181134	\$0.00	\$1,000.00	\$1,720.25		
3/30/2018	Payment: Visa/Master Card, APP# 133146	\$0.00	\$75.50	\$1,644.75		
4/2/2018	Payment: Visa/Master Card, APP# 134739	\$0.00	\$634.00	\$1,010.75		

Exhibit  
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# Client Account History

Client ID	13066	Current	30 Days	60 Days	90 Days	Account Balance
<b>Client Name</b>	Gravelle, Meagan & Tiffany	\$715.64	\$6.80	\$0.00	\$5,779.84	\$6,502.28
4/4/2018	Invoice #: 204480 - Closed			\$283.98	\$0.00	\$1,294.73
4/6/2018	Invoice #: 204477 - Closed			\$270.00	\$0.00	\$1,564.73
4/6/2018	Invoice #: 204478 - Closed			\$266.00	\$0.00	\$1,830.73
4/6/2018	Invoice #: 204479 - Closed			\$113.40	\$0.00	\$1,944.13
4/6/2018	Payment: Visa/Master Card, APP# 123847			\$0.00	\$908.50	\$1,035.63
4/10/2018	Invoice #: 205088 - Closed			\$125.00	\$0.00	\$1,160.63
4/11/2018	Invoice #: 205089 - Closed			\$388.00	\$0.00	\$1,548.63
4/12/2018	Invoice #: 205090 - Closed			\$196.00	\$0.00	\$1,744.63
4/12/2018	Invoice #: 205091 - Closed			\$113.00	\$0.00	\$1,857.63
4/12/2018	Invoice #: 205095 - Closed			\$68.00	\$0.00	\$1,925.63
4/14/2018	Invoice #: 205092 - Closed			\$240.00	\$0.00	\$2,165.63
4/15/2018	Invoice #: 205093 - Closed			\$195.00	\$0.00	\$2,360.63
5/3/2018	Invoice #: 206237 - Closed			\$510.80	\$0.00	\$2,871.43
5/4/2018	Invoice #: 205313 - Closed			\$418.00	\$0.00	\$3,289.43
5/5/2018	Invoice #: 206257 - Closed			\$532.00	\$0.00	\$3,821.43
5/5/2018	Invoice #: 206269 - Closed			\$246.50	\$0.00	\$4,067.93
5/5/2018	Invoice #: 206515 - Closed			\$55.00	\$0.00	\$4,122.93
5/11/2018	Invoice #: 10002313 - Closed			\$496.00	\$0.00	\$4,618.93
5/11/2018	Invoice #: 206096 - Closed			\$63.50	\$0.00	\$4,682.43
5/22/2018	Invoice #: 10002337 - Closed			\$140.00	\$0.00	\$4,822.43
5/30/2018	Invoice #: 206218 - Closed			\$127.00	\$0.00	\$4,949.43
5/30/2018	Account Comment: CALLED TIFFANY 972-342-5921: L/M TO C/B PMT?			\$0.00	\$0.00	\$4,949.43
6/5/2018	Payment: Visa/Master Card, APP# 141687			\$0.00	\$500.00	\$4,449.43
6/5/2018	EOM: Finance Charge			\$27.91	\$0.00	\$4,477.34
7/2/2018	EOM: Finance Charge			\$65.92	\$0.00	\$4,543.26
7/5/2018	Invoice #: 10002357 - Closed			\$511.55	\$0.00	\$5,054.81
7/5/2018	Invoice #: 207842 - Closed			\$326.75	\$0.00	\$5,381.56
7/6/2018	Account Comment: TIFFANY WILL ALL NEXT WEEK WITH PMT			\$0.00	\$0.00	\$5,381.56
7/10/2018	Invoice #: 207843 - Closed			\$185.00	\$0.00	\$5,566.56
7/18/2018	Payment: Visa/Master Card, APP# 131999			\$0.00	\$1,000.00	\$4,566.56
8/1/2018	Payment: Visa/Master Card, APP# 120883			\$0.00	\$500.00	\$4,066.56
8/2/2018	EOM: Finance Charge			\$45.65	\$0.00	\$4,112.21
9/1/2018	Invoice #: 210160 - Closed			\$320.28	\$0.00	\$4,432.49
9/5/2018	EOM: Finance Charge			\$61.00	\$0.00	\$4,493.49
10/2/2018	Account Comment: EMAILED meagangravelle@gmail.com: REQUESTING PAYMENT			\$0.00	\$0.00	\$4,493.49
10/3/2018	EOM: Finance Charge			\$61.00	\$0.00	\$4,554.49
10/12/2018	Invoice #: 211648 - Closed			\$1,031.00	\$0.00	\$5,585.49
10/29/2018	Invoice #: 10002479 - Closed			\$351.00	\$0.00	\$5,936.49
11/2/2018	EOM: Finance Charge			\$65.80	\$0.00	\$6,002.29
11/26/2018	Account Comment: CALLED 1-972-342-5921: COULD NOT LEAVE A MESSAGE			\$0.00	\$0.00	\$6,002.29
11/26/2018	Account Comment: CALLED MEAGAN 1-458-221-0877: L/M TO HAVE TIFFANY CALL ME			\$0.00	\$0.00	\$6,002.29
12/3/2018	EOM: Finance Charge			\$86.53	\$0.00	\$6,088.82
12/7/2018	Account Comment: CALLED TIFFANY 1-972-342-5921: COULD NOT LEAVE MESSAGE			\$0.00	\$0.00	\$6,088.82
12/7/2018	Account Comment: CALLED MEAGAN 1-458-221-0877: L/M TO C/B NEED TO TALK TO TIFFANY			\$0.00	\$0.00	\$6,088.82

Exhibit Page *J* ~~\$6,088.82~~

# Client Account History

Client ID	13066	Current	30 Days	60 Days	90 Days	Account Balance
<b>Client Name</b>	Gravelle, Meagan & Tiffany	\$715.64	\$6.80	\$0.00	\$5,779.84	\$6,502.28
12/17/2018	Account Comment: (12-16) EMAIL FROM MEAGAN: HAS NEW JOB WILL GET FIRST CHECK IN TWO WEEKS.			\$0.00	\$0.00	\$6,088.82
1/2/2019	EOM: Finance Charge			\$86.53	\$0.00	\$6,175.35
1/2/2019	EOM: Finance Charge			\$86.53	\$0.00	\$6,261.88
1/3/2019	Adjustment By KW, Comment: SER. CHARGE ADJ			\$0.00	\$86.53	\$6,175.35
1/22/2019	Invoice #: 215090 - Closed			\$11.00	\$0.00	\$6,186.35
1/22/2019	Payment: Cash			\$0.00	\$11.00	\$6,175.35
1/25/2019	Account Comment: CALLED MEAGAN 1-458-221-0877: MAIL BOX FULL			\$0.00	\$0.00	\$6,175.35
1/25/2019	Account Comment: EMAILED MEAGAN: meagangravelle@gmail.com:			\$0.00	\$0.00	\$6,175.35
1/25/2019	Account Comment: (1-22) MEAGAN CALLED OFFICE & GAVE FRONT DESK VISA # BUT NO DOLLAR AMOUNT TO RUN.			\$0.00	\$0.00	\$6,175.35
1/30/2019	Account Comment: CALLED MEAGAN 1-458-221-0877: MAIL BOX FULL			\$0.00	\$0.00	\$6,175.35
1/30/2019	Account Comment: CALLED TIFFANY 1-972-342-5921: SHE WILL CALL BACK WITH \$\$\$ AMOUNT TO RUN.			\$0.00	\$0.00	\$6,175.35
1/31/2019	Account Comment: NOTE FROM FRONT DESK: BY 6:15 P.M. NEITHER MEAGAN OR TIFFANY CALLED BACK.			\$0.00	\$0.00	\$6,175.35
2/1/2019	Payment: Visa/Master Card, APP# 125093			\$0.00	\$100.00	\$6,075.35
2/1/2019	Account Comment: MEAGAN EMAILED: \$100.00 TODAY & \$200.00 MONDAY			\$0.00	\$0.00	\$6,075.35
2/4/2019	EOM: Finance Charge			\$86.53	\$0.00	\$6,161.88
2/6/2019	Account Comment: EMAILED MEAGAN meagangravelle@gmail.com: RUN VISA?			\$0.00	\$0.00	\$6,161.88
2/22/2019	Account Comment: CALLED 1-458-221-0877: L/M TO C/B			\$0.00	\$0.00	\$6,161.88
3/5/2019	EOM: Finance Charge			\$86.70	\$0.00	\$6,248.58
3/7/2019	Payment: Visa/Master Card, APP# 407641			\$0.00	\$100.00	\$6,148.58
3/7/2019	Account Comment: DEPOSIT CORRECTION - AP			\$0.00	\$0.00	\$6,148.58
3/22/2019	Account Comment: CALLED 1-458-221-0877: L/M TO C/B			\$0.00	\$0.00	\$6,148.58
3/29/2019	Account Comment: CALLED 1-458-221-0877: L/M TO C/B			\$0.00	\$0.00	\$6,148.58
4/2/2019	EOM: Finance Charge			\$86.70	\$0.00	\$6,235.28
4/10/2019	Account Comment: EMAILED meagangravelle@gmail.com: REQUESTED PAYMENT			\$0.00	\$0.00	\$6,235.28
4/12/2019	Account Comment: CALLED 1-458-221-0877: L/M TO C/B			\$0.00	\$0.00	\$6,235.28
4/17/2019	Account Comment: MEAGAN EMAILED: WILL SEND \$100.00 PMT NEXT WEEK			\$0.00	\$0.00	\$6,235.28
4/29/2019	Account Comment: EMAILED TERMS			\$0.00	\$0.00	\$6,235.28
5/3/2019	EOM: Finance Charge			\$86.70	\$0.00	\$6,321.98
5/8/2019	Account Comment: EMAILED PAYMENT CONTRACT TO TIFFANY & MEAGAN			\$0.00	\$0.00	\$6,321.98
5/15/2019	Account Comment: EMAILED ALL EQUINE PATIENT RECORDS TO TIFFANY & MEAGAN.			\$0.00	\$0.00	\$6,321.98
5/22/2019	Account Comment: CALLED TIFFANY: PRINTER IS BROKE SO SHE CAN NOT PRINT CONTRACT FROM EMAIL.			\$0.00	\$0.00	\$6,321.98
5/22/2019	Account Comment: TIFFANY WILL BE IN THE OFFICE ON 5-31 WITH THE SIGNED CONTRACT & FIRST PMT. MAILED CONTRACT TO HER.			\$0.00	\$0.00	\$6,321.98
6/4/2019	Adjustment By KW, Comment: CERTIFIED MAIL FEE			\$6.80	\$0.00	\$6,328.78
6/4/2019	EOM: Finance Charge			\$86.70	\$0.00	\$6,415.48
6/4/2019	Account Comment: SENT 30 DAY DEMAND LETTER			\$0.00	\$0.00	\$6,415.48
7/2/2019	EOM: Finance Charge			\$86.80	\$0.00	\$6,502.28
7/2/2019	Account Comment: CERTIFIED LETTER RETURNED			\$0.00	\$0.00	\$6,502.28

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 of \$6,502.28

Scanned

sent certified.  
+ Regular mail

Date: June 4, 2019

Meagan & Tiffany Gravelle  
90161 Lake View Dr.  
Eugene, OR 97402  
ID #13066

RE: Delinquent Account – ORS 20.082 Attorney Fees

Dear Meagan & Tiffany,

I write in connection with your delinquent account with us.

As of June 4, 2019, the total amount due and owing on your delinquent account is **\$6,415.48** (principal of \$6,082.15). The principal balance continues to accrue interest.

By this letter, we hereby demand payment of the account in full, **\$6,082.15 plus service charge of \$333.33**. Payment should be made to the order of "South Willamette Veterinary Clinic" (formerly Hillview Veterinary Clinic).

Please take notice that if we have not received full payment, including per diem interest, in our office within **30** days of your receipt of this letter, or if other arrangements for payment have not been made with us by that date and time, we may elect to proceed with suit for the entire amount due and owing, **TOGETHER WITH ALL ATTORNEY FEES AND COSTS AND DISBURSEMENTS INCURRED PURSUANT TO ORS 20.082 IN OBTAINING JUDGMENT AND COLLECTING THE SAME.**

We urge you and your attorney to give this matter immediate attention.

Very truly yours,

Karen C. Wright

Exhibit 2  
Page 1 of 2

THE FEDERAL FAIR DEBT COLLECTION PRACTICES ACT MAY APPLY TO THIS TRANSACTION. THEREFORE, WE INFORM YOU OF THE FOLLOWING RIGHTS:

UNLESS YOU NOTIFY THIS OFFICE IN WRITING WITHIN 30 DAYS AFTER RECEIVING THIS NOTICE THAT YOU DISPUTE THE VALIDITY OF THE DEBT OR ANY PORTION THEREOF, WE WILL ASSUME THIS DEBT IS VALID. IF YOU MAKE WRITTEN REQUEST TO THIS OFFICE WITHIN 30 DAYS OF RECEIVING THIS NOTICE, THIS OFFICE WOULD BE REQUIRED TO OBTAIN VERIFICATION OF THE DEBT OR OBTAIN A COPY OF THE JUDGMENT AND MAIL YOU THE SAME. IF YOU MAKE WRITTEN REQUEST TO THIS OFFICE WITHIN 30 DAYS OF RECEIVING THIS NOTICE, THIS OFFICE WOULD BE REQUIRED TO PROVIDE YOU WITH THE NAME AND ADDRESS OF THE ORIGINAL CREDITOR, IF DIFFERENT FROM THE CURRENT CREDITOR.

THE FACT THAT YOU HAVE 30 DAYS TO INDICATE A DISPUTE OR REQUEST FURTHER INFORMATION MAY NOT PREVENT THIS OFFICE FROM TAKING FURTHER COLLECTION EFFORTS AGAINST YOU WITHIN THAT TIME.

THIS LETTER CONSTITUTES AN ATTEMPT TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

Donald R. Slayton  
Attorney at Law

Exhibit 2  
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