

Exhibit B

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE
CASE NO. 2:16-cv-00775

AILENE SABRINA BROYLES,

Plaintiff,

v.

COMPLAINT – CLASS ACTION

CONVERGENT OUTSOURCING, INC.,

JURY DEMAND

Defendant.

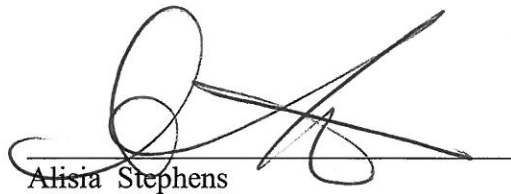
DECLARATION OF ALISIA STEPHENS

I, Alisia Stephens, declare under penalty of perjury, as provided for by the laws of the United States, 28 U.S.C. §1746, that the following statements are true:

1. I am an employee of Convergent Outsourcing, Inc. (“Convergent”) and I am authorized to make this declaration on its behalf.
2. I am currently Convergent’s Litigation Support Spec. and am authorized and qualified to testify as a custodian of records. The matters stated below are based on my own personal knowledge, as well as my review of Convergent’s business records.
3. Ms. Broyles filed for Chapter 7 Bankruptcy on March 2, 2015; discharge was granted on August 5, 2015.
4. On Ms. Broyles Schedule F listing of creditors, Alliance One was listed as a creditor of a T-Mobile/Convergent Collections account.
5. The T-Mobile account listed on Ms. Broyles Schedule F was placed with Convergent on June 11, 2013 and collections ceased after (electronic) notice of the Bankruptcy on March 3, 2015. The account was closed and returned to the client.

6. On February 1, 2016, Ms. Broyles delinquent Dish Account was placed for collection with Convergent by our client.
7. The Dish account placed with Convergent on February 1, 2016 was not listed on the Schedule F of Ms. Broyles prior Bankruptcy since the charges were incurred, and the account placement with Convergent, were post-petition.
8. The (soft) inquiries made by Convergent on February 2, 2016 and February 14, 2016 on the Dish Account were permissible under the FCRA.

Dated: June 24, 2016

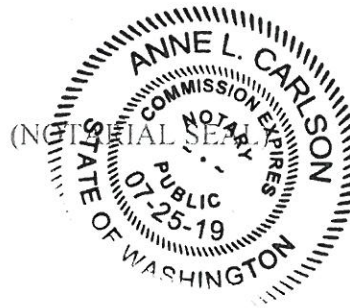


Alisia Stephens

Sworn to and subscribed before me,
a Notary Public, this 24 day of
June, 2016.



Notary Public



My commission expires: 7/25/19