#### UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS

Unknown Entity Holdings, LLC,

Plaintiff,

v.

Redwood Funding Group LLC,

Defendant.

Civ. Action No. 3:22-cv-02820

Jury trial demanded

#### COMPLAINT AND JURY DEMAND

Plaintiff Unknown Entity Holdings, LLC ("<u>Unknown Entity Holdings</u>" or "<u>Plaintiff</u>") by and through its attorneys, for its Complaint against Defendant Redwood Funding Group LLC, alleges, on knowledge as to its own actions, and otherwise on information and belief, as follows:

#### JURISDICTION AND VENUE

- 1. This court has jurisdiction over copyright infringement and unfair competition actions pursuant to 28 U.S.C. §§ 1331 and 1338(a) and (b), and pursuant to the principles of supplemental jurisdiction under 28 U.S.C. § 1367.
- 2. This Court has personal jurisdiction over Defendant because Defendant purposely availed itself of the privilege of conducting business in Texas. On information and belief, Defendant operates the website redwoodfundinggroup.com (the "Redwood Website"). Defendant attempts to establish a presence in Texas by directing its advertising at Texas consumers. For example, the Redwood Website has articles titled "Legal Funding in Texas and Lawsuit Funding in Texas" and "Texas Accident Funding & Texas Accident Loan" featured on its website that advertises its services expressly to Texas consumers. The Redwood Website has an interactive

<sup>&</sup>lt;sup>1</sup> A website capture showing the article is attached as Exhibit 1.

<sup>&</sup>lt;sup>2</sup> A website capture showing the article is attached as Exhibit 2.

application feature, and directs users, including Texas residents, to contact Defendant via mail, phone, fax and email. On information and belief, Defendant conducts its legal funding business in the state of Texas and with Texas consumers. Furthermore, as alleged herein, Defendant has committed a tort in whole or in part in Texas, subjecting it to jurisdiction here under Tex. Civ. Prac. & Rem. Code § 17.042.

3. Venue is proper in this district under 28 U.S.C. § 1391(b)(2), because a substantial part of the events or omissions giving rise to the claim occurred in this district, or 28 U.S.C. § 1391(b)(3), because Defendant is subject to personal jurisdiction in this district.

#### **PARTIES**

- 4. Plaintiff Unknown Entity Holdings, LLC is a Delaware limited liability company with a principal place of business at 5717 Legacy Drive, Suite 250, Plano, Texas 75024.
- 5. On information and belief, Defendant is a New York limited liability company with a principal place of business at 517 Churchill Rd, Teaneck, New Jersey 07666.

#### **FACTS**

- A. <u>Plaintiff and the Copyrighted Work.</u>
- 6. Third-party Express Legal Funding LLC ("Express") created the work, "What is the Best Lawsuit Funding Company" (the "Copyrighted Work"), on or around March 2, 2021. As a result, Express owned any and all copyright rights in the Copyrighted Work.
- 7. On March 2, 2021, the Copyrighted Work was first made available on Express's website, expresslegalfunding.com.

- 8. Express filed an application for copyright registration for the Copyrighted Work. The U.S. Copyright Office granted registration of the Copyrighted Work as Registration Number TXu002299820.<sup>3</sup> The registration date for the Copyrighted Work is January 20, 2022.
- 9. On September 30, 2022, Express assigned the Copyrighted Work, along with Express's website, to Unknown Entity Holdings. That same day, Unknown Entity Holdings granted Express a license to use, reproduce, publicly perform, transmit, publicly display, distribute, and create derivative works based on the Copyrighted Work.
- 10. The Copyrighted Work is wholly original, and Unknown Entity Holdings is the owner of the Copyrighted Work, and the owner of valid and subsisting United States Copyright Registration No. TXu002299820.

#### B. Defendant's Conduct

- 11. On information and belief, Defendant is engaged in the legal funding business in Texas and in other States. Defendant posts articles related to legal funding on the Redwood Website.
- 12. On the Redwood Website, Defendant has published, printed, and publicly displayed, or caused to be published, printed, and publicly displayed, an article titled "Cheap Lawsuit Loans 2021" (the "Infringing Work")<sup>4</sup>, which is substantially similar to and a derivative work based on the Copyrighted Work. On information and belief, the Infringing Work was first made available to the public on April 13, 2021 via the Redwood Website, and the Infringing Work has been continuously available to the public since that time.

<sup>&</sup>lt;sup>3</sup> A copy of the Registration Certificate is attached as Exhibit 3.

<sup>&</sup>lt;sup>4</sup> A copy of the Infringing Work is attached as Exhibit 4.

- 13. On information and belief, Defendant obtained physical possession of or otherwise viewed Plaintiff's Copyrighted Work, and intentionally copied and made a derivative work of the Copyrighted Work to create the Infringing Work. That Defendant copied the Copyrighted Work when it created the Infringing Work is evidenced by the striking similarities between the Copyrighted Work and the Infringing Work, which cannot possibly be explained other than as a result of copying and Defendant's access to the Copyrighted Work as a result of the Copyrighted Work being available on Plaintiff's website, expresslegalfunding.com, before Defendant created the Infringing Work.
- 14. Defendant copied the Copyrighted Work without Plaintiff's authorization, consent, or knowledge, and without any remuneration to Plaintiff.
- 15. As a result of Defendant's actions described above, Plaintiff has been directly damaged, and is continuing to be damaged, by the unauthorized reproduction, distribution, and public display of the Infringing Work. Defendant has never accounted to or otherwise paid Plaintiff for its use of the Copyrighted Work.
- 16. Defendant's acts are causing, and unless restrained, will continue to cause damage and immediately irreparable harm to Plaintiff for which Plaintiff has no adequate remedy at law.

## COUNT I Federal Copyright Infringement (17 U.S.C. § 501)

- 17. Plaintiff repeats and realleges paragraphs 1 through 16 hereof, as if fully set forth herein.
- 18. The Copyrighted Work is an original literary work containing copyrightable subject matter for which copyright protection exists under the Copyright Act, 17 U.S.C. § 101, et. seq. Plaintiff is the exclusive owner of rights under copyright law in and to the Copyrighted Work. Plaintiff owns a valid copyright registration for the Copyrighted Work, attached as Exhibit 3.

- 19. Through Defendant's conduct alleged herein, including Defendant's reproduction, distribution, and public display of the Infringing Work, which is copied from, derivative of, and substantially similar to Plaintiff's Copyrighted Work, without Plaintiff's permission, Defendant has directly infringed Plaintiff's exclusive rights in the Copyrighted Work in violation of Section 501 of the Copyright Act, 17 U.S.C. § 501.
- 20. On information and belief, Defendant's infringing conduct alleged herein was, and continues to be, willful and with full knowledge of Plaintiff's rights in the Copyrighted Work, and has enabled Defendant illegally to obtain profit therefrom.
- 21. As a direct and proximate result of Defendant's infringing conduct alleged herein, Plaintiff has sustained and will continue to sustain substantial, immediate, and irreparable injury, for which there is no adequate remedy at law. On information and belief, unless Defendant's infringing conduct is enjoined by this Court, Defendant will continue to infringe the Copyrighted Work. Plaintiff therefore is entitled to permanent injunctive relief restraining and enjoining Defendant's ongoing infringing conduct.

### COUNT II Unfair Competition (Texas common law)

- 22. Plaintiff repeats and realleges paragraphs 1 through 21 hereof, as if fully set forth herein.
- 23. Plaintiff, through its successor in interest, created the Copyrighted Work through extensive time, labor, skill and money.
- 24. Defendant's use of the Copyrighted Work in creating the Infringing Work and making the Infringing Work available on the Redwood Website allowed Defendant to gain a special advantage in the legal funding industry because Defendant was burdened with little or none

of the expense incurred by Plaintiff, and because the Infringing Work diverts readers and consumers away from Plaintiff's website to the Redwood Website.

25. As a direct and proximate result of Defendant's conduct alleged herein, Plaintiff has sustained and will continue to sustain substantial, immediate, and irreparable injury, for which there is no adequate remedy at law. On information and belief, unless Defendant's conduct is enjoined by this Court, Defendant will continue to gain an unfair advantage from use of the Copyrighted Work on the Redwood Website. Plaintiff therefore is entitled to permanent injunctive relief restraining and enjoining Defendant's ongoing conduct.

WHEREFORE, Plaintiff respectfully requests this Court enter a judgment in favor of Plaintiff against Defendant on all counts, and grant an injunction, permanently enjoining Defendant, its employees, agents, officers, directors, attorneys, successors, affiliates, subsidiaries, and assigns, and all of those in active concert and participation with any of the foregoing persons and entities who receive actual notice of the Court's order by personal service or otherwise, from:

- (a) distributing, advertising, or displaying, or authorizing any third party to distribute, advertise, or display the Infringing Work and any products, works, or other materials that include, copy, are derived from, or otherwise embody the Copyrighted Work;
- (b) reproducing, distributing, or publicly displaying the Copyrighted Work, creating any derivative works based on the Copyrighted Work, or engaging in any activity that infringes Plaintiff's rights in its Copyrighted Work; and
- (c) aiding, assisting, or abetting any other individual or entity in doing any act prohibited by sub-paragraphs (a) or (b); and for such other and further relief as the Court deems just and proper.

#### **JURY DEMAND**

Plaintiff Unknown Entity Holdings, LLC respectfully demands a trial by jury as to all counts so triable.

Date: December 16, 2022 Respectfully submitted,

THOMPSON COBURN LLP

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Attorneys for Plaintiff

## **EXHIBIT 1**

### 



Document title: Cheapest Legal Funding & Lawsuit Funding in Texas Capture URL: https://redwoodfundinggroup.com/legal-funding-lawsuit-funding-texas/ Page loaded at (UTC): Thu, 01 Dec 2022 20:02:07 GMT Capture timestamp (UTC): Thu, 01 Dec 2022 20:02:29 GMT Capture tool: 10.12.1 Collection server IP: 3.90.170.83 Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Browser engine: Gecko) Chrome/106.0.5249.181 Safari/537.36 Operating system: Windows\_NT (Node 16.16.0) PDF length: Capture ID: pPWimwEcfB9BfzQcjk22fS User: tc-tgrossmann

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PDF REFERENCE #:

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### **News & Articles**

Advance \$1,000	0-6 mo.	6-12 mo.	12-18 mo.	18-24 mo.	24-30 ma.
\$2,000	\$1,150	\$1,300	\$1,450	\$1,600	\$1,750
\$2,500	\$2,300 \$2,875	52,600	\$2,900	\$3,200	\$3,500
\$3,000	\$3,450	\$3,250	\$3,625	\$4,000	\$4,375
\$3,500	\$4,025	\$3,900 \$4,550	\$4,350 \$4,812	\$4,800 \$5,075	\$5,250 \$5,600
\$5,000	\$5,750	\$6,500		\$8,000	\$8,750
			57,250		
\$7,500	\$8,625	\$9,750	\$10,875	\$12,000	\$13,125
\$10,000	\$11,500	\$13,000	\$14,500	\$16,000	\$17,500
\$15,000	\$17,250	\$19,500	\$21,750	\$24,000	\$26,250
\$100,000	\$115,000	\$130,000	\$145,000	\$160,000	\$175,000
ie amount owed	continues beyond	30 months at the	same fixed rate f	or each additional	6 month period.
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	Online App				

LEGAL FUNDING IN TEXAS AND LAWSUIT FUNDING IN TEXAS

April 11, 2018 🛔 Jeffrey A. Rubin

Redwood Funding Group never charges fees and never compounds the interest. One Fixed Rate of 15%. Borrow \$1,000, You Owe \$150 Every Six Months. That's It!.

#### Redwood Funding Group:

Are you from Houston or Austin or Dallas, Texas? Did you have an accident and are having trouble paying some bills? Then you might need legal funding. As a result, in Texas, Redwood Funding Group provides lawsuit funding so that you can relax during the pendency of your lawsuit. Compare the rates of Redwood Funding Group on this website to any legal funding co. in the country. Consequently, see how much you will save. No fees and No compound interest. We are the hottest funder in the country.

Begin the process by filling out an online Application on this website, you can call us at (201) 357 4124 or you may e mail us at info@RedwoodFundingGroup.com

#### **Legal Funding:**

If you are considering obtaining legal funding then consider Redwood Funding Group for your financing needs. Right on this website, we have a guaranteed repayment schedule. Call any lawsuit funding company in Texas or the United States and ask then what they will charge.

Ready To Apply?

**APPLY NOW** 

Compare the same amount borrowed with Redwood Funding Group. Note, we beat all legal funding companies from \$1,000 to \$100,000.

Some of these companies, it seems, will not give you the straight answer that you deserve. However, if they do, then directly compare apples to apples with our repayment schedule. We predict that Redwood Funding Group provides the cheapest accident funding pricing in the country! We back that up by putting our repayment schedule right on our website. Amazing!

#### **Apples to Apples:**

Why are we the cheapest? probably because our competitors will hit yo up with monthly compounded fees as high as 70-80% a year. Because our competitors will charge you so many different kinds of fees. Furthermore, they will then make you responsible to pay those super high rates on the amount of money you borrow, the numerous fees added on top of that and sometimes even \$80 just to send you a bank wire or Federal Express.

#### **Best Legal Funding:**

Redwood Funding Group wants to ease your money problems not add to them. That is why you will never see any fee in any cash for settlements we make. You will also never see any compound interest on any lawsuit funding that we make. By the way, you also won't be charged \$80 for a bank wire. You will pay the wire fee that we are charged and we will prove it.

It is bad enough that you might need an accident funding advance. Why would anyone go to a company that is going to make your financial situation much much worse? Remember, if you lose your lawsuit you won't owe us anything. We only get paid if you win. Fill out an Application with Redwood Funding Group and see how easy, quick, inexpensive for and in Texas.

▶ Tags: America's #1 Accident Loans, America's #1 Law Loans, America's #1 Legal Funding, Best Lawsuit Funding, Best Legal Funding, Best Pre Settlement Loans, Bridgeway Legal Funding, Buckeye Legal Funding, Lawsuit Funding Texas, Legal Funding Texas, Pre Settlement Funding texas, Pre Settlement Loans, Texas Lawsuit Funding, Texas Legal Funding

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Top 10 Car Accident Funding Companies Pre Settlement Funding Legal Finance Legal Funding Lawsuit Cash Advance Accident Funding Lawsuit Cash Advance Lawsuit Funding Loans For Lawsuits Accident Cash Advance Settlement Loans Litigation Funding Personal Injury Loans Lawsuit Loans Near Me
Lawsuit Settlement Loans in Atlanta
& USA
Avera & Smith Pre Settlement Loans
Settlement Cash Advance
Pre Settlement Loans. Pre Settlement
Funding.



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It is bad enough that you might need an accident funding advance. Why would anyone go to a company that is going to make your financial situation much much worse? Remember, if you lose your lawsuit you won't owe us anything. We only get paid if you win. Fill out an Application with Redwood Funding Group and see how easy, quick, inexpensive for and in Texas.

◆ Tags: America's #1 Accident Loans, America's #1 Law Loans, America's #1 Legal Funding, Best Lawsuit Funding, Best Legal Funding, Best Pre Settlement Loans, Bridgeway Legal Funding, Buckeye Legal Funding, Lawsuit Funding Texas, Legal Funding Texas, Pre Settlement Funding texas, Pre Settlement Loans, Texas Lawsuit Funding, Texas Legal Funding



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& USA
Avera & Smith Pre Settlement Loans
Settlement Cash Advance
Pre Settlement Loans. Pre Settlement
Funding.

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## **EXHIBIT 2**



Document title:	Texas Accident Funding & Accident Loans-Redwood Funding Group
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User:	tc-tgrossmann

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TEXAS ACCIDENT FUNDING & TEXAS ACCIDENT LOAN

🛗 April 9, 2018 🛔 Jeffrey A. Rubin

Redwood Funding Group never charges fees and never compounds the interest. One Fixed Rate of 15%. Borrow \$1,000, You Owe \$150 Every Six Months. That's It!.

#### Texas:

Texas is the second largest state in the United States by both area and population. Houston is the most populous city in Texas and the fourth largest in the U.S. San Antonio is the second-most populous in the state and seventh largest in the U.S. Dallas—Fort Worth and Greater Houston are the fourth and fifth largest metropolitan statistical areas in the country, respectively. Other major cities include Austin, the second-most populous state capital in the U.S., and El Paso. With all those people and all of those different places, people are bound to get into accidents. Due to these accident they might need Texas Accident Funding or a Texas Accident Loan.

#### **Texas Accident Victims:**

When a person gets into an accident, they usually have a lot of medical bills to pay. If insurance doesn't cover those bills those people might run into trouble. What's more is that these same people might not be able to work because of the injuries suffered in the accident. So now one has medicals bills to pay but no money coming in. Additionally, they might have a mortgage to pay, school tuition or cell phone bills. What can this accident victim do? Well for starters he can sue the person responsible for his injuries. He might even make a lot of money in the end but the lawsuit is probably going to take several years. What are his options?

Ready To Apply?

APPLY NOW

#### **Settlement:**

This accident victim might be relying on the monies from the lawsuit to pay all his bills. However, that money won't be coming for several years. What can this person do?. The first place to look is to family and friends to lend him money. If that doesn't work people might try getting a loan from a bank. However, banks won't lend money based upon an accident case. The person might have to turn to their credit cards to pay off the bills. What does the person do if they don't have or maxed out on their credit cards? Unfortunately, before Texas Accident Funding they would probably settle their accident case. What this means it they would be taking pennys on the dollar of the worth of their case. Settle early, settle low or something like that.

#### **Texas Accident Funding:**

Texas Accident Funding in general and Redwood Funding Group specifically was founded to address just those financial needs. The Texas Accident Loans founders recognized that due to accidents people are going to have high medical and related bills. They also recognized that these same people might be out of work due to their injuries. A quick shot of money might be just the answer to the problems facing these people. Texas Accident Loan companies advance money in exchange for the money back plus interest at the end of a case. The kicker is that you don't have to pay anything back if you lose the case. You only owe money back to these Texas Accident Loan companies if you win or settle your case.

#### Interest:

Once you know that you need an Texas Accident Loan, where do you begin finding the right company for you. For most people, paying the least amount of money is the most important criteria in picking an Texas Accident Loan company. Some people might like speed, some might like a friendly hello but the most important criteria is the best deal. What should you look at in deciding the best accident loan company for you. PRICE! What is the annual, not monthly, interest rate an accident funding company charges. A lot of Texas Accident Loan companies advertise that they charge 3% interest. What they don't tell you is that they mean 3% per month compounded. Compounded mean each months amount is based on the previous month. 3% monthly interest comes to about 70% a year.

#### Fees:

Most Texas Accident Funding companies charge fees. They might call it an administrative, processing or underwriting fee. They might not even call it a fee but they will charge you for something. Those fees can be anywhere from \$150 to \$500. These same accident funding companies will take the fee and add it upon the money you are being advanced. So you are paying interest on the money that you borrowed plus the fee. For example, if you borrowed \$1,000 and the fees is \$500 you owe interest on \$1,500. However, you are only getting a \$1,000 advance. You might not even get that \$1,000.

#### Costs:

The Texas Accident Loan company won't just rip you off with super high interest payments. They won't just rip you off with crazy fees. What they will also do is even make money on the nickle and dime charges to send you the money. They might offer Western Union or a bank wire. What does a bank wire cost? \$30, \$35? They will charge you about \$80 to do a bank wire and keep like \$50 profit and take it our of your advance. Bottom line: your advance is costing you \$1,500 and you are only getting \$950. I call that robbery.

#### **Redwood Funding Group:**

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won't just rip you off with crazy fees. What they will also do is even make money on the nickle and dime charges to send you the money. They might offer Western Union or a bank wire. What does a bank wire cost? \$30, \$35? They will charge you about \$80 to do a bank wire and keep like \$50 profit and take it our of your advance. Bottom line: your advance is costing you \$1,500 and you are only getting \$950. I call that robbery.

#### **Redwood Funding Group:**

Redwood Funding Group has one fixed rate of interest, 15%. That means, for every six month interval that you have our money, you owe us 15% of it. Not 3% monthly compounded or 65% a year. 15% every six months. What about fees? redwood Funding Group won't charge you any fees in any form at any time. No fees and no compound interest sounds pretty good right? Not only that, Redwood Funding Group will charge you what the bank or Federal Express will charge to get you your money. We don't make one penny off sending you your money. We challenge you find a cheaper legal funding company in the entire State of Texas or in the entire United States of America.

◆ Tags: Accident Funding Texas, Accident Loan Texas, Best Lawsuit Funding, Best Legal Funding, Best Pre Settlement Loans, BridgewayLF, Buckeye Legal Funding, BuckeyeLF, Legal Funding Texas, Oasis Funding, Pre Settlement Texas, Texas Accident Funding, Texas Accident Loan, Texas Legal Funding, Texas Pre Settlement



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Accident Funding Lawsuit Cash Advance Lawsuit Funding Loans For Lawsuits Accident Cash Advance Settlement Loans Litigation Funding Personal Injury Loans

Lawsuit Settlement Loans in Atlanta & USA
Avera & Smith Pre Settlement Loans
Settlement Cash Advance
Pre Settlement Loans. Pre Settlement
Funding.

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## **EXHIBIT 3**

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This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Shina Plumutter
United States Register of Copyrights and Director

Registration Number TXu 2-299-820

Effective Date of Registration: January 20, 2022 Registration Decision Date: February 09, 2022

Title	
Title of Work:	What is the Best Lawsuit Funding Company?
Completion/Publication _	
Year of Completion:	2021
Author	
• Author: Author Created: Work made for hire: Citizen of:	Express Legal Funding, LLC text Yes United States
Copyright Claimant	
Copyright Claimant:	Express Legal Funding, LLC 5717 Legacy Drive, Suite 250, Plano, TX, 75024, United States
Certification	
Name: Date:	Aaron Winston January 20, 2022

## **EXHIBIT 4**

### Case 3:22-cv-02820-K Document 1-4 Filed 12/16/22



Document title: Cheap Lawsuit Loans 2021 - Redwood Funding Group

Capture URL: https://redwoodfundinggroup.com/cheap-lawsuit-loans-pre-settlement-funding/

Page loaded at (UTC): Thu, 01 Dec 2022 20:02:34 GMT

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Capture tool: 10.12.1

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Gecko) Chrome/106.0.5249.181 Safari/537.36

Operating system: Windows\_NT (Node 16.16.0)

PDF length: 4

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User: tc-tgrossmann

PDF REFERENCE #: x4YUdnUAQJygmhsTNFS1o5



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**CHEAP LAWSUIT LOANS 2021** 

🛗 April 13, 2021 🛔 admin

Redwood Funding Group never charges fees and never compounds the interest. One Fixed Rate of 15%. Borrow \$1,000, You Owe \$150 Every Six Months. That's It!.

#### **Cheap Lawsuit Loans:**

Are you looking for Cheap Lawsuit Loans? Are you having a hard time choosing what lawsuit loan company to use. The answer is easy: Redwood Funding Group. Why? Redwood Funding never charges fees. We never compound the interest. All you pay is 15% fixed of the principal every six months you have our money. No lawsuit loan company in America will or can offer you this deal.

#### Step 1: Do You Need A Lawsuit Loan:

If you are the victim of an accident you might need a Cheap Lawsuit Loan. Why? First, you probably suffered some injuries as a result of the accident. Consequently, you might not be able to continue working, if you have a job. Hence, this might mean that you don't have money coming in. However, you definitely still have those phone bills, the rent and food bills. Also, you probably need to pay to get to those doctors visits.

What are your choices?

#### Step 2: Choosing the Right Pre Settlement Funder:

Ready To Apply?

APPLY NOW

You may never have heard of Pre Settlement Funding. What does it all mean and how can it help you? A Cheap Lawsuit Loan can give you money upfront to pay your bills or spend the money however you need.

There are many lawsuit loan companies out there and the trick on which to choose will be answered right here. Pre Settlement Companies are a dime a dozen. They all have slick websites and advertisements. You might be attracted to their "low rates" or "no risk" offers. Here's the answer: Choose a Cheap Lawsuit Loan company that will deliver your money fast and easy.

#### Step 3: Confused About The Right Lawsuit Loan?:

If you are seeking a Cheap Lawsuit Loan or a Pre Settlement Loan then you have to ask 3 questions every person that answers the telephone when you call to ask:

- 1. Do you charge fees?
- 2. Do you compound your interest rate?
- 3. What exactly will I owe for the amount I borrow after 1, 2, and 3 years?

#### Fees:

Almost all lawsuit loans companies charge fees. These fees are called application, underwriting or management fees. Furthermore, some of the gutsy litigation funders will also charge closing or middle of the case management fees. Consequently, these fees can be from \$100 to \$500. Above all, what the litigation funder will do is add the fee to the principal you are borrowing.

Therefore, in addition to having to pay interest [we will get to that] on your principal, most funders make you pay interest on the fee as well. For example, if you borrow \$1,000 and the fee is \$200, your interest will be based upon \$1,200. However, you are only taking home \$1,000 [at this point, at least].

#### Interest:

Compound interest is interest on top of the previous periods interest. If that period is one year, great. However, if the interest is compounded monthly then 3% is really 75% a year. That doubles in 1 and one half years. \$2,400 in 18 months. Do not use a lawsuit loan company that compounds interest. In our opinion, companies that compound interest are deceptive. Lastly, look for Pre Settlement finance companies that don't compound the interest.

#### What Will I Owe Exactly?:

When you call these other Pre Settlement Funding companies, most will not answer your questions directly. Consequently, when you ask them 'exactly how much I will owe after 1,2, or 3 years?' they won't give you the answer. This is due to the fact that they don't want to scare you off and hang up. They will say something like 'this is not my department' or 'we need more information'. For these lawsuit funding companies we would hang up.

Other Lawsuit Loan companies will give you an answer about how much you will owe. However, we guarantee that the amount quoted to you on the telephone will be higher than Redwood Funding Group.

#### Redwood Funding Group:

RFG is so confident that we have the cheapest lawsuit loans in the country that we post the repayment schedule on our website. Go to this website and see our Guaranteed Repayment Schedule. Compare it to any other Pre Settlement Loan company in the nation. You will see that we back up what we say with proof. Easy, Cheap Lawsuit Loans.



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For more on Redwood Funding, see:

https://www.facebook.com/redwoodfunding

https://redwoodfundinggroup.tumblr.com/

▶ Tags: 2021, Best Accident Funding 2021, Best Accident Loans 2021, Best Accident Loans Georgia 2021, Best Lawsuit Loans 2021, Best Pre Settlement Funding 2021, Buckeye Fnding, Buckeye Legal Funding, BuckeyeLF, Cheap Lawsuit Loan, Cheap Lawsuit Loans, Cheap Lawsuit Loans 2021, Cheapest Lawsuit Loan, Georgia Lawsuit Loans 2021, Pre Settlement Funding 2021



Next >>

Top 10 Car Accident Funding Companies Pre Settlement Funding Legal Finance Legal Funding Lawsuit Cash Advance Accident Funding Lawsuit Cash Advance Lawsuit Funding Loans For Lawsuits Accident Cash Advance Settlement Loans Litigation Funding Personal Injury Loans

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JS 44 (Rev. 10/20) - TXND (10/20)

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The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of preadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.) **DEFENDANTS** I. (a) PLAINTIFFS Unknown Entity Holdings, LLC Redwood Funding Group LLC (b) County of Residence of First Listed Plaintiff Collin County, TX County of Residence of First Listed Defendant Bergen County, NJ (EXCEPT IN U.S. PLAINTIFF CASES) (IN U.S. PLAINTIFF CASES ONLY) IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED. (c) Attorneys (Firm Name, Address, and Telephone Number) Attorneys (If Known) Thompson Coburn LLP, 2100 Ross Ave., Suite 3200, Dallas, TX 75201. tel - (972) 629-7100. II. BASIS OF JURISDICTION (Place an "X" in One Box Only) III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff (For Diversity Cases Only) and One Box for Defendant) 1 U.S. Government **x** 3 Federal Question DEF Plaintiff (U.S. Government Not a Party) Citizen of This State Incorporated or Principal Place 4 4 1 of Business In This State 2 U.S. Government 4 Diversity Citizen of Another State 2 Incorporated and Principal Place  $\square$  5 Defendant (Indicate Citizenship of Parties in Item III) of Business In Another State 3 Foreign Nation Citizen or Subject of a 3 □ 6 Foreign Country IV. NATURE OF SUIT (Place an "X" in One Box Only) Click here for: Nature of Suit Code Descriptions. CONTRACT **TORTS** FORFEITURE/PENALTY BANKRUPTCY OTHER STATUTES 110 Insurance PERSONAL INJURY PERSONAL INJURY 625 Drug Related Seizure 422 Appeal 28 USC 158 375 False Claims Act 365 Personal Injury -120 Marine 310 Airplane of Property 21 USC 881 423 Withdrawal 376 Qui Tam (31 USC 130 Miller Act 315 Airplane Product Product Liability 28 USC 157 690 Other 3729(a)) 367 Health Care/ 400 State Reapportionment 140 Negotiable Instrument Liability 150 Recovery of Overpayment 320 Assault, Libel & PROPERTY RIGHTS Pharmaceutical 410 Antitrust & Enforcement of Judgment Slander Personal Injury 820 Copyrights 430 Banks and Banking 330 Federal Employers' 830 Patent 450 Commerce 151 Medicare Act Product Liability 152 Recovery of Defaulted Liability 835 Patent - Abbreviated 460 Deportation 368 Asbestos Personal 340 Marine 470 Racketeer Influenced and Student Loans Injury Product New Drug Application (Excludes Veterans) 345 Marine Product Liability 840 Trademark Corrupt Organizations PERSONAL PROPERTY 153 Recovery of Overpayment Liability LABOR 880 Defend Trade Secrets 480 Consumer Credit 350 Motor Vehicle 370 Other Fraud 710 Fair Labor Standards (15 USC 1681 or 1692) of Veteran's Benefits Act of 2016 160 Stockholders' Suits 355 Motor Vehicle 371 Truth in Lending Act 485 Telephone Consumer Product Liability 720 Labor/Management 190 Other Contract 380 Other Personal SOCIAL SECURITY Protection Act 195 Contract Product Liability 360 Other Personal Property Damage 490 Cable/Sat TV Relations 861 HIA (1395ff) 196 Franchise Injury 385 Property Damage 740 Railway Labor Act 862 Black Lung (923) 850 Securities/Commodities/ 362 Personal Injury -Product Liability 751 Family and Medical 863 DIWC/DIWW (405(g)) Exchange Medical Malpractice 864 SSID Title XVI Leave Act 890 Other Statutory Actions REAL PROPERTY PRISONER PETITIONS 790 Other Labor Litigation CIVIL RIGHTS 865 RSI (405(g)) 891 Agricultural Acts 210 Land Condemnation 440 Other Civil Rights Habeas Corpus: 791 Employee Retirement 893 Environmental Matters 220 Foreclosure 441 Voting 895 Freedom of Information 463 Alien Detainee Income Security Act FEDERAL TAX SUITS 230 Rent Lease & Ejectment 442 Employment 510 Motions to Vacate 870 Taxes (U.S. Plaintiff Act 240 Torts to Land 443 Housing/ Sentence or Defendant) 896 Arbitration 871 IRS—Third Party 245 Tort Product Liability Accommodations 530 General 899 Administrative Procedure IMMIGRATION 26 USC 7609 290 All Other Real Property 445 Amer, w/Disabilities 535 Death Penalty Act/Review or Appeal of 462 Naturalization Application Employment Other: Agency Decision 465 Other Immigration 446 Amer. w/Disabilities 540 Mandamus & Other 950 Constitutionality of 550 Civil Rights Other Actions State Statutes 448 Education 555 Prison Condition 560 Civil Detainee -Conditions of Confinement V. ORIGIN (Place an "X" in One Box Only) 2 Removed from 4 Reinstated or 5 Transferred from 6 Multidistrict ☐ 8 Multidistrict Original Remanded from Proceeding State Court Appellate Court Reopened Another District Litigation -Litigation -Direct File (specify) Transfer Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 17 U.S.C. § 501 VI. CAUSE OF ACTION Brief description of cause: Copyright Infringement VII. REOUESTED IN CHECK YES only if demanded in complaint: CHECK IF THIS IS A CLASS ACTION **DEMAND \$** UNDER RULE 23, F.R.Cv.P. **COMPLAINT:** JURY DEMAND: ▼Yes No VIII. RELATED CASE(S) (See instructions): IF ANY JUDGE DOCKET NUMBER

SIGNATURE OF ATTORNEY OF RECORD DATE 12/16/2022 /s/ Nicole L. Williams FOR OFFICE USE ONLY AMOUNT APPLYING IFP JUDGE RECEIPT# MAG. JUDGE