



**PHILADELPHIA MUNICIPAL COURT
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA**

1339 Chestnut Street, 10th Floor, Philadelphia, PA 19107
Marsha H. Neifield, President Judge Patricia R. McDermott, Deputy Court Administrator

LANDLORD AND TENANT COMPLAINT

Date Filed: 06/24/2016

LT-16-06-24-5797

Passyunk Avenue Revitalization Inc.
1134 Titan Street
Philadelphia, PA 19147

LPPassyunk Inc, AKA/DBA: All Occupants
1934-36 East Passyunk Avenue First Floor
Philadelphia, PA 19148

Plaintiff(s)

Defendant(s)

- I. Plaintiff states that he/she/it owns the real property located at the following address: [1934-36 East Passyunk Avenue First Floor, Philadelphia, PA 19148](#). Plaintiff further states that there is a lease between him/her/it and the above-referenced defendant(s). The lease is [written, attached](#) and began on [11/01/2014](#) for the term of [a year or more](#). Additionally, plaintiff states that the lease is [non-residential](#).
- II. Plaintiff states that he/she/it is [in compliance](#) with Section 102.1 of the Philadelphia Property Maintenance Code by having a valid housing inspection license at the time of filing. [A copy of the license is attached](#).
- IV. Plaintiff states that the subject premises is [fit](#) for its intended purpose.

Plaintiff states that he/she/it is [unaware](#) of any open notice issued by the Department of Licenses and Inspections (“Department”) alleging that the property at issue is in violation of one or more provisions of the Philadelphia Code.
- V. Plaintiff states that notice to vacate the subject premises by [03/17/2016](#) was given to the defendant on [03/10/2016](#). A copy of the notice is attached.
- VI. The defendant is [in possession of the property and refuses to surrender possession of the property](#).
- VII. Plaintiff demands [a judgment of possession](#) and a [money judgment](#) in the amount itemized below based on Non Payment of amounts due under the lease.

The amount of unpaid rent below and late fees alleged due.				Summarized alleged amounts due:	
Month	Year	Rent	Late Fee		
April	2016	8500.00	900.00	Rent	\$25,500.00
May	2016	8500.00	900.00	Late Fees	\$2,700.00
June	2016	8500.00	900.00	Gas	\$0.00
Plaintiff Landlord reserves the right to accelerate rental payments at the time of the hearing pursuant to Section 12(b)(2)(ii) of the Lease Agreement affixed as an Exhibit.				Electric	\$0.00
a. \$8,583.33 per month through October, 2017				Water / Sewer	\$1,290.16
b. \$9,441.66 per month from November 2017 until October 2019				Attorney's Fees	\$1,000.00
c. \$9,441.66 per month from November 2019 until October 2021				Other	\$0.00
d. \$9,583.33 per month from November 2021 until October 2024				Subtotal	\$30,490.16
				Court Costs	\$112.00
				Total	\$30,602.16

ONGOING RENT IN THE AMOUNT OF [\\$8,500.00](#) FROM THE DATE OF THE FILING OF THIS COMPLAINT TO THE DATE OF THE HEARING ON THE MERITS IN THIS MATTER.

Filing Party: JONATHAN ROSENAU 1500 Walnut Street, Suite 206, Philadelphia, PA 19102		Phone Number: (215) 545-8500
I am an attorney for the plaintiff(s), the plaintiff's authorized representative or have a power of attorney for the plaintiff(s) in this landlord tenant action. I hereby verify that I am authorized to make this verification; that I have sufficient knowledge, information and belief to take this verification or have gained sufficient knowledge, information and belief from communications with the plaintiff or the persons listed below and that the facts set forth are true and correct to the best of my knowledge, information and belief. I understand that this verification is made subject to the penalties set forth in 18 Pa. C.S. § 4904, which concerns the making of unsworn falsifications to authorities. If I am an authorized representative or have a power of attorney, I have attached a completed Philadelphia Municipal Court authorized representative form or a completed power of attorney form. JONATHAN ROSENAU _____ Signature Plaintiff/Attorney	SUMMONS TO THE DEFENDANT: You are hereby ordered to appear at a hearing scheduled as follows:	CITATION: Al demandado por la presente, usted esta dirigido a presentarse a la siguiente:
	LOCATION (SITO): 1339 Chestnut Street 6th Floor Philadelphia, PA 19107 Hearing Room: 3	DATE (FECHA): July 27th, 2016 TIME (HORA): 08:45 AM
NOTICE TO THE DEFENDANT: YOU HAVE BEEN SUED IN COURT. PLEASE SEE ATTACHED NOTICE.	NOTA IMPORTANTE PARA EL ACUSADO: USTED HA SIDO DEMANDO EN CORTE: POR FAVOR MIRA PAPELE ESCRITA.	



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Complaint Continuation

Breach of a condition(s) of the lease other than nonpayment of rent. The conditions allegedly breached were:

[Allowing a creditor to file a Confession of Judgment pursuant to Section 12\(a\)\(1\) of the Lease. Failing to pay Water Bills pursuant to Section 5\(c\) of the Lease.](#)