

Gurstel Law Firm, P.C.
Spencer B. Lythgoe (#11921)
Chadd A. Johnson (#16291)
Cassidy Pettit (#20339)
Soundarya Jayaraman (#20630)
Attorney for Plaintiff
6681 Country Club Drive
Golden Valley, MN 55427
877-344-4002
info@gurstel.com
File #: 2046748

IN THE THIRD JUDICIAL DISTRICT COURT OF SALT LAKE COUNTY
STATE OF UTAH, SALT LAKE CITY DEPARTMENT

Portfolio Recovery Associates, LLC Plaintiff, v. Pepe Lopez Martinez Defendant	SUBMISSION OF ANSWER Civil Number. 269922892 Judge: LINDA JONES
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Plaintiff hereby submits Defendant's Answer, which was sent to Plaintiff's Counsel but not previously filed with the Court.

DATED this 10 day of September, 2026

/s/ Cassidy Pettit

Cassidy Pettit
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document on
September 10, 2026, addressed as follows:

PEPE LOPEZ MARTINEZ
pepelope47@gmail.com

/s/ CASSIDY PETTIT

Cassidy Pettit
Attorney for Plaintiff

Jean Bennett

From: Pepe Lope <pepelope47@gmail.com>
Sent: Monday, August 31, 2026 12:16 PM
To: Info
Subject: RV: fill up the form
Attachments: Debt Collection Answer form.pdf

Categories: Jeannie

Sending again

De: Pepe Lope <pepelope47@gmail.com>
Enviado: lunes, 17 de agosto de 2026 16:50
Para: info@gurstel.com <info@gurstel.com>
Asunto: fill up the form

Good afternoon. I filled out the form to the best of my understanding; please let me know if anything is incorrect so I can fix it. Also, if you have Judge Johns' email address, could you please send it to me so I can forward a copy to him? Thank you.

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Use the phish alert button in your outlook to verify any email you are unsure of.

PEPE LOPEZ MARTINEZ

Name

8358 S Wilson Crest Way,

Address

WEST JORDAN

City, State, Zip

8018092403

Phone

pepelope47@gmail.com

Email

Check your email. You will receive information and documents at this email address.

I am ☐ Plaintiff/Petitioner ☐ Defendant/Respondent

[] Plaintiff/Petitioner's Attorney [x] Defendant/Respondent's Attorney (Utah Bar #: _____)

In the Court of Utah

_____ Judicial District UT _____ County

Court Address 450 south state street salt lake city ut 84114

Debt Collection Answer

porfolio recovery associates

Plaintiff/Petitioner

v.

pepe lopez martinez

Defendant/Respondent

Case Number

269922892

Judge

johns

Commissioner (domestic cases)

1. Agree

I agree completely with everything stated in the following numbered paragraphs of the complaint (Write the paragraph number(s) from the complaint.):

agree

2. Disagree

I disagree with all or part of the following numbered paragraphs of the complaint (Write the paragraph number(s) from the complaint.):

Write your response.

3. Not enough information to agree or disagree

I do not have enough information to agree or disagree with the following paragraphs of the complaint (Write the paragraph number(s) from the complaint.):

Write your response.

Explanation of responses (Optional. Complete only if you have more to say. Add additional pages if needed.)

4. Referring to paragraph number _____ of the complaint or petition, I state that:

Write your response.

5. Referring to paragraph number _____ of the complaint or petition, I state that:

Write your response.

Affirmative defenses

(Optional. Complete these paragraphs only if you know a reason why the plaintiff should not win the case, other than what you have already stated in your answers above. Check all defenses that apply and add any additional defenses.)

6. ☐ Account issues

- The account is not my account, or
- I am not the person who placed the charges on the account, or
- I am not the person who incurred the debt.

7. ☐ Ambiguous contract

The contract is too ambiguous to be enforced.

8. ☐ Bankruptcy

I have a pending bankruptcy case or the debt was discharged in a previous bankruptcy case.

Date case filed: _____

Bankruptcy case number: _____

9. ☐ Claims not allowed

The claims are not allowed because the debt is based on:

- a contract of adhesion (i.e. a take-it-or-leave-it contract),
- an unconscionable contract,
- a contract that is illegal or against public policy,
- an illusory contract (i.e. a contract for which I did not receive anything in exchange), or
- a contract that I did not sign or otherwise agree to.

10. ☐ Co-signer

I was a co-signer but was not informed of my rights as a co-signer.

11. ☐ Contract cancelled

- I legally cancelled the contract and therefore do not owe anything, or
- the creditor cancelled the contract and therefore is not entitled to payment.

12. ☐ Debt ownership

The plaintiff is not the original owner of the debt and may not be able to prove that it rightfully owns the debt.

13. ☐ Debt paid or excused

The debt has been paid or excused. For that reason, the claims are barred by accord and satisfaction, discharge, waiver, or release.

14. ☐ Fraud or duress

The creditor lied to me, threatened me, or physically forced me to enter the contract or do the deal. For that reason, the claims are barred because the debt was procured through fraud, fraud in the inducement, or duress (Explain.):

Write your response.

15. ☐ Goods and services issues

- I never received the goods or services for which the debt was allegedly incurred, or
- the goods and services were defective, or
- the creditor damaged my property when delivering the goods or services.

16. ☐ Laches, estoppel or unclean hands

- The creditor/plaintiff waited too long to bring the claims, or
- it is unfair for the creditor/plaintiff to bring the claims, or
- the creditor/plaintiff behaved badly with regard to the alleged debt.

For that reason, the claims are not allowed by laches, estoppel, or unclean hands.

- 17. ☐ Loan acceleration
The creditor was not permitted to accelerate the loan.
- 18. ☐ Mitigation of damages
The creditor did not mitigate damages. They failed to take actions to protect themselves and/or minimize the amount of the alleged debt.
- 19. ☐ No claim
The complaint does not state a claim on which relief can be granted.
- 20. ☐ Offset
I am entitled to an offset for amounts that I have paid or that should otherwise be credited to me.
- 21. ☐ Performance
The plaintiff did not perform under the contract and is therefore barred from recovering under the contract.
- 22. ☐ Res judicata
I or someone associated with me has previously been sued for the alleged debt. For that reason, the claims are barred by res judicata.
- 23. ☐ Sale of property – commercially reasonable manner
After repossessing my property, the creditor or its representatives did not sell the property in a commercially reasonable manner (i.e. they sold it without properly advertising it or for less than it was worth).
- 24. ☐ Sale of property – notice
After repossessing my property, the creditor or its representatives did not give me proper notice of the date, time and place of sale, thereby entitling me to offsetting statutory damages.
- 25. ☐ Statute of frauds
The alleged debt is based on a credit agreement or an agreement to pay the debt of another person, but the contract is not in writing and signed as required by the statute of frauds and is therefore barred.
- 26. ☐ Statute of limitations
The claims are barred because they were brought after the six-year statute of

limitations period for actions based on a contract, or because another applicable statute of limitations has expired.

27. [] Other (State any other reason why the plaintiff should not be granted their request.)

Write your response.

28. Request

(Optional. Specifically explain what you want the court to do based on your defenses.)

after covid is hard to me to pay.

I declare under criminal penalty under the law of Utah that everything stated in this document is true.

Signed at WEST JORDAN, UT (city, and state or country).

08/17/2026

Date

Signature



pepe lopez

Printed Name

PEPE LOPEZ MARTINEZ

Attorney or Licensed Paralegal Practitioner of record (if applicable)

Signature



Date

Printed Name

Certificate of Service

I certify that I filed with the court and am serving a copy of this Debt Collection Answer on the following people.

Person's Name	Service Method	Service Address	Service Date
pepe lopez martinez	☐ Mail ☐ Hand Delivery ☐ E-filed/MyCase ☒ Email ☐ Left at business (With person in charge or in receptacle for deliveries.) ☐ Left at home (With person of suitable age and discretion residing there.)		
	☐ Mail ☐ Hand Delivery ☐ E-filed/MyCase ☐ Email ☐ Left at business (With person in charge or in receptacle for deliveries.) ☐ Left at home (With person of suitable age and discretion residing there.)		
	☐ Mail ☐ Hand Delivery ☐ E-filed/MyCase ☐ Email ☐ Left at business (With person in charge or in receptacle for deliveries.) ☐ Left at home (With person of suitable age and discretion residing there.)		

08/17/2026

Date

Signature



pepe lopez

Printed
Name

PEPE LOPEZ MARTINEZ