





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

1339 Chestnut Street, 10th Floor, Philadelphia, PA 19107  
T. Francis Shields, President Judge                      John J. Joyce, Deputy Court Administrator

**LANDLORD AND TENANT COMPLAINT**

# LT-25-08-25-5532

Complaint Continuation

Date Filed: 08/25/2025

IV. Plaintiff states that the leased property:

- A. was built **before** March of 1978.
- B. **is not a residential property developed by or for an educational institution** for the exclusive use and occupancy by that institution's students.
- C. **is not owned or subsidized by the Philadelphia Housing Authority or its subsidiaries**, or privately owned and leased under the Housing Choice Voucher Program; and
- D. **has or will have** a child aged six or younger.
- E. The lease is effective **from December 21, 2012 to the present**.

V. **I have provided** the defendant with a **valid certification** prepared by a certified lead inspector stating that the property is either lead free or lead safe. **A copy of the certification is attached.**

VI. 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.

VII. No notice is required under the terms of the lease.

VIII. The defendant is **in possession of the property and refuses to surrender possession of the property**.

IX. Plaintiff demands **a judgment of possession** and a **money judgment** in the amount itemized below based on the following:



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\* **Nonpayment of amounts** due under the lease, for **X** months, **from: X, X to and including: X, X**

The amount of unpaid rent below and late fees alleged due.				Summarized alleged amounts due:	
<b>Month</b>	<b>Year</b>	<b>Rent</b>	<b>Late Fee</b>	Rent	\$0.00
				Late Fees	\$0.00
				Gas	\$0.00
				Electric	\$0.00
				Water / Sewer	\$0.00
				Attorney's Fees	\$725.00
				Other	\$0.00
				<b>Subtotal</b>	\$725.00
				Court Costs	\$105.25
				<b>Total</b>	\$830.25

ONGOING RENT IN THE AMOUNT OF **\$2,255.00** FROM THE DATE OF THE FILING OF THIS COMPLAINT TO THE DATE OF THE HEARING ON THE MERITS IN THIS MATTER.

\* Breach of a condition(s) of the lease other than nonpayment of rent. The conditions allegedly breached were:  
**Violent assault of another resident within the leased premises; criminal activity.**

<b>Filing Party:</b> Jacob W. Segal, 1845 Walnut St., Suite 1900, Philadelphia, PA 19103, 325726, 2159810999, jsegal@mpmpc.com 1845 WALNUT STREET, 19TH FLOOR, PHILADELPHIA, PA 19103		<b>Phone Number:</b> 215.981.0999
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. &sect; 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.  Jacob Ross Wasser-Segal  _____ Signature Plaintiff/Attorney	<b>SUMMONS TO THE DEFENDANT:</b> You are hereby ordered to appear at a hearing scheduled as follows:	<b>CITATION:</b> Al demandado por la presente, usted esta dirigido a presentarse a la siguiente:
	<b>LOCATION (SITO):</b> 1339 Chestnut Street 6th Floor Philadelphia, PA 19107 <b>Hearing Room: 3</b>	<b>DATE (FECHA):</b> September 22nd, 2025 <b>TIME (HORA):</b> 08:30 AM
<b>NOTICE TO THE DEFENDANT: YOU HAVE BEEN SUED IN COURT. PLEASE SEE ATTACHED NOTICE.</b>		<b>NOTA IMPORTANTE PARA EL ACUSADO: USTED HA SIDO DEMANDO EN CORTE: POR FAVOR MIRA PAPELE ESCRITA.</b>