

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF WASHINGTON

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PURE FINANCIAL FUNDING,

Plaintiff,

-against-

DAEDALUS COMPOSITES LLC D/B/ A DAEDALUS
GROUP HOLDINGS and MICHAEL ALEXANDER
REARDON,

Defendants.
-----x

INDEX NO:

SUMMONS

Designated Venue: Washington
County

Basis of venue designated:
Contract

TO THE ABOVE-NAMED DEFENDANTS:

YOU ARE HEREBY SUMMONED to answer the Complaint in this action and to serve a copy of your Answer, or if the Complaint is not served with this Summons, to serve a Notice of Appearance, on the Plaintiff's attorneys within 20 days after service of this Summons, exclusive of the day of service (or within 30 days after the service is completed if this Summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the Complaint.

DATED: Garden City, NY
September 17, 2025

DAVID FOGEL P.C.

s/ David Fogel

David Fogel, Esq.

1225 Franklin Avenue

Suite 201

Garden City, New York 11530

Tel: (516) 279-1420

Attorney for Plaintiff

File No.: 46183

DEFENDANTS:

DAEDALUS COMPOSITES LLC d/b/a DAEDALUS GROUP HOLDINGS
328 Yeopim Rd
Edenton, NC 27932

MICHAEL ALEXANDER REARDON
328 Yeopim Rd
Edenton, NC 27932

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VERIFIED COMPLAINT

Plaintiff, by its attorneys, DAVID FOGEL P.C., as and for its complaint herein, alleges against DAEDALUS COMPOSITES LLC D/B/A DAEDALUS GROUP HOLDINGS and MICHAEL ALEXANDER REARDON (collectively, "Defendants"), the following:

1. At all times hereinafter mentioned, Plaintiff was and still is a limited liability company authorized to do business in New York.
2. At all times hereinafter mentioned, upon information and belief, Defendant DAEDALUS COMPOSITES LLC D/B/A DAEDALUS GROUP HOLDINGS was and still is a limited liability company, organized under the laws of the State of NC.
3. At all times hereinafter mentioned, upon information and belief, Defendant MICHAEL ALEXANDER REARDON was and still is a resident of the State of NC.
4. Defendants agreed that any action between the parties arising out of the subject contract described hereunder be instituted in any court sitting in New York State

and are therefore subject to the jurisdiction of this Court.

AS AND FOR A FIRST CAUSE OF ACTION
(Breach of Contract Against DAEDALUS COMPOSITES LLC D/B/A DAEDALUS GROUP HOLDINGS)

5. Plaintiff and DAEDALUS COMPOSITES LLC D/B/A DAEDALUS GROUP HOLDINGS entered into a written contract, dated August 06, 2025 (the “Contract”) whereby DAEDALUS COMPOSITES LLC D/B/A DAEDALUS GROUP HOLDINGS sold to Plaintiff its future receipts having a value of \$79,950.00 (“Receivables”) for the sum of \$50,000.00 (“Purchase Price”), which Receivables were to be paid to Plaintiff pursuant to a payment schedule set forth in the Contract. A true and correct copy of the Contract with Guaranty and addenda is annexed as **Exhibit 1**.
6. Upon Plaintiff’s receipt of the executed Contract and pursuant to its terms, Plaintiff performed its obligations under the Contract and delivered the net Purchase Price after deducting the disclosed fees to DAEDALUS COMPOSITES LLC D/B/A DAEDALUS GROUP HOLDINGS.
7. On or about **September 09, 2025**, Defendant failed to deliver the Receivables as agreed in the Contract and thereby defaulted under the Contract. Specifically, Plaintiff received from its bank a return code indicating that Defendant’s remittance, which was to be made on **September 09, 2025** via ACH, failed because there were non-sufficient funds in Defendant’s account (R01) for the 15th consecutive time without giving Plaintiff prior notice of same and thereby frustrated Plaintiff's ability to collect the Receivables that were due and owing.

Defendant's repeated failure to remit and provide notice to Plaintiff frustrated Plaintiff's ability to collect the Receivables that were due and owing and is considered an Event of Default under the Contract. See Section 30 "Events of Default," in the Contract (Exhibit 1).

8. DAEDALUS COMPOSITES LLC D/B/A DAEDALUS GROUP HOLDINGS

agreed that in the event of its default under the Contract, such as the one alleged herein, the full uncollected Receivables plus all fees due under the Contract (as a result of the default) would become immediately due and payable in full to Plaintiff.

9. Based upon the foregoing and after accounting for payments made and applicable fees, DAEDALUS COMPOSITES LLC D/B/A DAEDALUS GROUP HOLDINGS owes Plaintiff a balance in the amount of \$69,655.00.

10. Moreover, pursuant to the Contract, said defendant owes Plaintiff reasonable attorneys' fees in an amount to be determined by the Court.

11. By reason of the foregoing, Plaintiff has been damaged as a result of the above-described default in an amount of no less than **\$69,655.00** with interest thereon from September 09, 2025.

AS AND FOR A SECOND CAUSE OF ACTION
(Breach of Guaranty Against MICHAEL ALEXANDER REARDON)

12. Plaintiff repeats, reiterates and re-alleges each and every allegation contained within the preceding paragraphs as if fully set forth at length herein.

13. Defendant MICHAEL ALEXANDER REARDON executed a Personal Guaranty

of Performance of all the obligations of the corporate codefendant set forth in the Contract.

14. By reason of the Guaranty, said Defendant is obliged to pay to Plaintiff the amount set forth in the preceding cause of action.

WHEREFORE, Plaintiff demands judgment against Defendants, as follows:

- (i) On the first cause of action, against DAEDALUS COMPOSITES LLC D/B/A DAEDALUS GROUP HOLDINGS, in the amount of **\$69,655.00** with interest from September 09, 2025;
- (ii) On the second cause of action, against MICHAEL ALEXANDER REARDON, in the amount of **\$69,655.00** with interest from September 09, 2025;
- (iii) attorney's fees in amount as the Court deems just and proper;
- (iv) all together with the costs and disbursements of this action; and
- (v) any such other and further relief as the Court deems just and proper.

DATED: Garden City, NY
September 17, 2025

DAVID FOGEL P.C.

s/ David Fogel

David Fogel, Esq.

1225 Franklin Avenue

Suite 201

Garden City, New York 11530

Tel: 516-279-1420

Attorney for Plaintiff

File No.: 46183

SUPREME COURT OF THE STATE OF NEW YORK
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PURE FINANCIAL FUNDING,

Plaintiff,

-against-

DAEDALUS COMPOSITES LLC D/B/A DAEDALUS
GROUP HOLDINGS and MICHAEL ALEXANDER
REARDON,Defendants.
-----X☒ **PLAINTIFF VERIFICATION**STATE OF NJ)
COUNTY OF OCEAN) ^{SS.}

DANIEL STEIN, being duly sworn, deposes and says:

I am Director of Collections of PURE FINANCIAL FUNDING, the Plaintiff herein; I have read the foregoing complaint and know the contents thereof; that the same is true to my knowledge except those matters herein stated to be alleged upon information and belief, and as to those matter I believe them to be true. The grounds for my belief as to those matters herein not stated upon my knowledge is based upon the records in my possession.

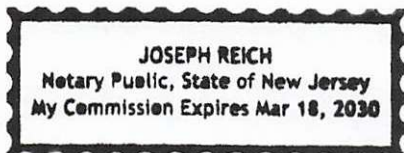


DANIEL STEIN

SWORN TO BEFORE ME THIS

17th DAY OF September, 2025

NOTARY PUBLIC

☐ **ATTORNEY VERIFICATION**

DAVID FOGEL, an attorney duly admitted to practice before the Court of the State of New York, affirms the truth of the following under the penalties of perjury:

1. That I am the attorney of record for the Plaintiff with respect to the above-entitled action, and as such I am fully familiar with the facts and circumstances set forth in Plaintiff's annexed complaint. I have read the foregoing complaint and, upon information and belief, know the contents thereof to be true. This verification is made by your deponent rather than by plaintiff because Plaintiff's residence/principal place of business is located in a county other than the county in which my law office is situated.

2. The grounds of my belief include my review of certain of Plaintiff's books and records, and my communications with Plaintiff.

Dated: Garden City, NY
September 17, 2025

DAVID FOGEL P.C.

David Fogel, Esq.

SUPREME COURT OF THE STATE OF NEW YORK
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NOTICE OF ELECTRONIC FILING (Mandatory Case)
(Uniform Rule § 202.5-bb)

You have received this Notice because:

- 1) The Plaintiff/Petitioner, whose name is listed above, has filed this case using the New York State Courts E-filing system ("NYSCEF"), and
- 2) You are a Defendant/Respondent (a party) in this case.

• **If you are represented by an attorney:**

Give this Notice to your attorney. (Attorneys: see "Information for Attorneys" pg. 2).

• **If you are not represented by an attorney:**

You will be served with all documents in paper and you must serve and file your documents in paper, unless you choose to participate in e-filing.

If you choose to participate in e-filing, you must have access to a computer and a scanner or other device to convert documents into electronic format, a connection to the internet, and an e-mail address to receive service of documents.

The **benefits of participating in e-filing** include:

- serving and filing your documents electronically
- free access to view and print your e-filed documents
- limiting your number of trips to the courthouse
- paying any court fees on-line (credit card needed)

To register for e-filing or for more information about how e-filing works:

- visit: www.nycourts.gov/efile-unrepresented or
- contact the Clerk's Office or Help Center at the court where the case was filed. Court contact information can be found at www.nycourts.gov

To find legal information to help you represent yourself visit www.nycourthelp.gov

Information for Attorneys (E-filing is Mandatory for Attorneys)

An attorney representing a party who is served with this notice must either:

1) immediately record his or her representation within the e-filed matter on the NYSCEF site www.nycourts.gov/efile; or

2) file the Notice of Opt-Out form with the clerk of the court where this action is pending and serve on all parties. Exemptions from mandatory e-filing are limited to attorneys who certify in good faith that they lack the computer hardware and/or scanner and/or internet connection or that they lack (along with all employees subject to their direction) the knowledge to operate such equipment. [Section 202.5-bb(e)]

For additional information about electronic filing and to create a NYSCEF account, visit the NYSCEF website at www.nycourts.gov/efile or contact the NYSCEF Resource Center (phone: 646-386-3033; e-mail: efile@nycourts.gov).

Dated: September 17, 2025

DAVID FOGEL P.C.

s/ David Fogel

David Fogel, Esq.

Tel: 516-279-1420

legaldocs@dfogelpc.com

File No.: 46183