



2010CI - 17379

PAGE'S PRINTING

IN THE DISTRICT COURT

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VS.

ANIMAL SANCTUARY OF THE UNITED STATES D/B/A WILD ANIMAL ORPHANAGE

OF BEXAR COUNTY, TEXAS

PLAINTIFF'S ORIGINAL PETITION

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TO THE HONORABLE JUDGE OF SAID COURT:

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COMES NOW PAGE'S PRINTING, hereafter styled Plaintiff, complaining of ANIMAL SANCTUARY OF THE UNITED STATES d/b/a WILD ANIMAL ORPHANAGE, and files this, its Plaintiff's Original Petition and for such says:

- 1. This suit will be tried under Discovery Level II.
- 2. This court has jurisdiction and venue is proper in Bexar County inasmuch as the parties are domiciled in Bexar County, Texas and all material events leading up to this controversy also occurred in Bexar County, Texas.
- 3. ANIMAL SANCTUARY OF THE UNITED STATES d/b/a WILD ANIMAL ORPHANAGE is a non-profit corporation and it may be served with process by serving Michelle Anthony-Cryer, President of the Board of Directors at 9626 Leslie Road, San Antonio, Bexar County, Texas 78254.
- 4. Plaintiff would show unto the court that it is in the printing business and that the instance and request of the Defendant has over a period of time printed any number of brochures and materials to be used by Defendant in advancing its sanctuary for wild animals.

- Plaintiff would further show unto the Court that it had an indebtedness which was reduced by Defendant to the sum of Forty Six+Thousand-Seven Hundred Eighty and 70/100 Dollars (\$46,780.70) but which is now unpaid for an unreasonable period of time.
- 6. Plaintiff would further show unto the Court that it rendered these goods and services to Defendant at the latter's request and despite repeated demands for payment the Defendant has refused to pay the same in toto for reasons better known to itself.
- 7. Plaintiff further says that this claim falls under the provisions of Section 38.001,

 Texas Civil Practice and Remedies Code and accordingly, Plaintiff is further entitled to recover reasonable attorney's fees in addition to the amount claimed above.

PREMISES CONSIDERED, Plaintiff prays that Defendant be duly cited to appear and answer herein, and that upon final trial hereof Plaintiff recover judgment of and from the Defendant in the amount of Forty Six Thousand Seven Hundred Eighty and 70/100 Dollars (\$46,780.70), together with prejudgment and post judgment interest as provided by law, that it further recover its reasonable attorney's fees for services rendered by the undersigned counsel in these proceedings to final effect, that it further recover its costs of court in this behalf expended, for general and special relief, whether at law or in equity, and that such further orders be made herein as to the Court may seem proper.

Respectfully submitted,

MAYO J. GALINDO

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ATTÖRNEY FOR PLAINTIFF

VERIFICATION

STATE OF TEXAS §

COUNTY OF BEXAR §

BEFORE ME, the undersigned authority, on this day personally appeared MAYO J. GALINDO, who being by me first duly sworn, upon his oath deposes and says:

I am the attorney for Plaintiff in the above styled and captioned cause, have read the allegations and the proof supporting the underlying claim which is the basis for these proceedings, and further authorized to executed this Affidavit on Plaintiff's behalf, and further certify the allegations contained herein are true and correct.

Mayo J. Dal MAYO J GALINDO

SWORN TO AND SUBSCRIBED BEFORE ME, the undersigned authority, by the said Mayo J. Galindo, to certify which, witness my hand and seal of office, this __/___ day of October, 2010.

DOLORES LEAL

Notary Public
State of Texas
My Comm. Exp. 12-22-2011

Notary Public, State of Texas

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DISTRICT CLERK BEXAR CO. TEXAS

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