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IN THE CIRCUIT COURT OF LAFAYETTE COUNTY, MISSOURI
AT LEXINGTON

ERIN E. HEIMSOTH 9 South Eleventh Street P.O. Box 280 Lexington, MO 64067 Plaintiff,	)	
vs.	)	Case No. _____
THOMAS W. DUNMIRE III 6803 Lakeside Circle Odessa, MO 64076 Defendant.	)	

PETITION FOR SUIT ON ACCOUNT

COMES NOW the Plaintiff, Erin E. Heimsoth, and for her Petition for Suit on Account, hereby states, alleges and avers as follows:

1. That Plaintiff, Erin E. Heimsoth, is an attorney doing business in and within Lafayette County, Missouri.

2. That Defendant, Thomas W. Dunmire III is a resident of Lafayette County, Missouri.

3. On or about October 24, 2018, Defendant contracted with and retained the services of Plaintiff to represent him as legal counsel in Lafayette County, Missouri. That on or about said date, Plaintiff informed Defendant that the hourly rate for her legal services at the time was $225.00 per hour, paralegal services performed at the rate of $75.00 per hour, and expenses incurred.

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4. Plaintiff represented Defendant in the aforementioned action for a period in excess of eighteen (18) months, during which Plaintiff and her staff performed 54.6 hours of work on Defendant's behalf plus litigation expenses.

5. After application of payments from the Defendant, Defendant still owes Plaintiff the total amount of Four Thousand Eleven and 50/100 Dollars ($4,011.50).

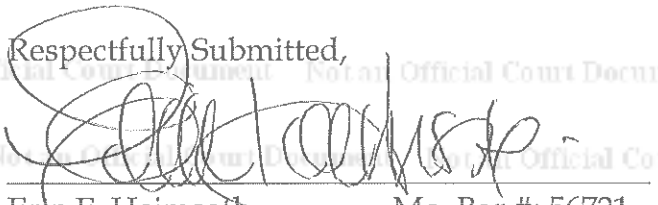
6. Said amount represents a fair and reasonable sum as and for Plaintiff's services in this regard.

7. Plaintiff has made numerous demands on Defendant for payment, and that despite said demands, Defendant has refused to pay.

8. As a direct result of Defendant's aforementioned failure and refusal to pay, Plaintiff has been damaged in the amount of $4,011.50.

WHEREFORE Plaintiff prays this Court enter judgment against the Defendant, THOMAS W. DUNMIRE III, in the amount of $4,011.50, for prejudgment and post judgment interest at the maximum rate available by law; for Plaintiff's costs herein incurred, including court costs and special process server fees, if any; and for any such other and further orders, judgments, and decrees as this Court may deem just and appropriate in the premises.

Respectfully Submitted,



Erin E. Heimsoth Mo. Bar #: 56721
AULL, SHERMAN, WORTHINGTON, GIORZA,
AND HAMILTON, L.L.C.

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