

IN THE ASSOCIATE CIRCUIT COURT OF THE CITY OF ST. LOUIS
STATE OF MISSOURI

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WILLIAM A. RICHTER)
Assignee of Peper, Martin, Jensen,)
Maichel and Hetlage, a partnership,)
Plaintiff,)

vs.)

HAROLD ILG, an individual,)
Defendant.)

Cause No. 982-612
Div. 27

Serve at: 100 Lambiance Circle)
Apt. 202)
Naples, FL 34108-6713)

PETITION ON ACCOUNT

COMES NOW Plaintiff, by and through his attorney, Eric D. Martin, and for his cause of action herein, states:

1. Plaintiff William A. Richter is an individual partner of the law partnership of Peper, Martin, Jensen, Maichel and Hetlage in the City of St. Louis. On July 11, 1997, Peper, Martin, Jensen, Maichel and Hetlage, a partnership, assigned to Plaintiff all rights, title, and interest to collect the claim described more specifically below, as per the copy of the assignment and power of attorney, attached hereto and incorporated by reference as Exhibit 1.
2. Plaintiff's cause of action accrued and the debt sued upon arose in the City of St. Louis, State of Missouri.
3. Upon information and belief, Defendant, Harold Ilg, is a resident of the State of Florida, and resides at 100 Lambiance Circle, Apt. 202, Naples, Florida 34108-6713.

EXHIBIT 1 1 of 3

4. Venue is proper in the Associate Circuit Court of the City of St. Louis, pursuant to Mo. Rev. Stat. § 508.010(4), which provides that venue is proper in any county of the state when the defendant is a non-resident of the state.

5. Jurisdiction is proper in the Associate Circuit Court of the City of St. Louis pursuant to the Missouri Rule of Civil Procedure 54.06 which provides that Missouri courts can exercise personal jurisdiction over any person who transacts business within this state, makes any contract within this state, or owns, uses or possesses any real estate situated in this state.

6. Defendant, Harold Ilg, transacted business within this state by employing the law firm of Peper, Martin, Jensen, Maichel and Hetlage to provide services to him relating to his estate plans.

7. Defendant, Harold Ilg, contracted with Peper, Martin, Jensen, Maichel and Hetlage for the rendition of legal services.

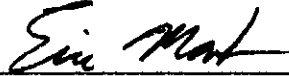
8. Defendant, Harold Ilg, owns real property in the county of St. Louis. The legal description of the property is as follows:

Lot 33 of Valley View Plat 2, according to the Plat thereof recorded in the Plat Book 190 Pages 10 and 11 of the St. Louis County Recorder's office.

9. Defendant, Harold Ilg, is indebted to Plaintiff on account of legal services provided by and costs advanced by Peper, Martin, Jensen, Maichel and Hetlage for services rendered by said partnership to Defendant through January 20, 1995, in the sum of \$ 1,637.00.

10. The aforementioned balance was due to Plaintiff from Defendant, and demand was made by Plaintiff on Defendant on or before June 5, 1996 and payment has been refused. The prices charged by Plaintiff to Defendant were reasonable.

WHEREFORE, Plaintiff prays judgment against Defendant, Harold Ilg, an individual, for the principal sum of \$1,637.00, together with interest thereon, and for court costs incurred herein.



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Attorney for Plaintiff