

24TH JUDICIAL DISTRICT COURT FOR THE PARISH OF JEFFERSON

STATE OF LOUISIANA

No.

Division: “ “

CHARLES B. IVY, d/b/a IVY ENGINEERING ASSOCIATES, INC.

VERSUS

**TIMOTHY G. SCHAFER, ESQUIRE AND SCHAFFER & SCHAFER,
ATTORNEYS AT LAW**

FILED: _____

DEPUTY CLERK

PETITION ON OPEN ACCOUNT

NOW INTO COURT, through the undersigned counsel, comes petitioner,
CHARLES B. IVY, d/b/a IVY ENGINEERING ASSOCIATES, INC. a Florida
Corporation authorized to do and doing business in the Parish of Jefferson, State of
Louisiana, and respectfully represents the following, to wit:

I.

Made defendant herein is **TIMOTHY G. SCHAFER, ESQUIRE AND SCHAFFER &
SCHAFER, ATTORNEYS AT LAW**, a person of the full age of majority and a
resident and domiciliary of the Parish of _____, State of Louisiana.

II.

Defendant is justly and truly indebted to petitioner in the full sum of
\$ _____, plus interest and attorney's fees and for all costs of these
proceedings. An itemization of this debt is annexed hereto as Exhibit "A" and made part
hereof.

III.

Although defendant has acknowledged this indebtedness herein sued upon,
defendant, **TIMOTHY G. SCHAFER, ESQUIRE AND SCHAFFER & SCHAFER,
ATTORNEYS AT LAW**, has failed to make payment of the amount owed,
\$ _____, or any part thereof, since _____.

IV.

Petitioner has made amicable demand to no avail. A copy of the certified letter is
attached hereto as Exhibit "B."

V.

More than fifteen (15) days have elapsed since petitioner mailed to the defendant written demand for payment. Therefore, petitioner is entitled to be awarded reasonable attorney's fees, pursuant to LSA –R.S. 9:2781, which petitioner respectfully requests to be fixed at the rate of twenty-five per cent (25%) of the principal and interest due.

WHEREFORE, petitioner prays that after due proceedings had there be judgment herein in favor of petitioner, **CHARLES B. IVY, d/b/a IVY ENGINEERING ASSOCIATES, INC** and against defendant, **TIMOTHY G. SCHAFFER, ESQUIRE AND SCHAFFER & SCHAFFER, ATTORNEYS AT LAW**, in the full and true sum of \$ _____, together with judicial interest from the date of judicial demand until paid in full, plus twenty-five per cent (25%) of the principal and interest as attorney's fees, for all costs of these proceedings, and for any and all other equitable relief permissible under the law and deemed appropriate under the circumstances.

THIS IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

Respectfully submitted:

Law Offices of Michael G. Calogero, L.L.C.

By: _____
MICHAEL G. CALOGERO (#22748)
3500 North Hullen Street
Metairie, LA 70002
Telephone: (504) 739-9858
**ATTORNEYS FOR PETITIONER,
CHARLES B. IVY, d/b/a IVY
ENGINEERING ASSOCIATES, INC.**

PLEASE SERVE:

**TIMOTHY G. SCHAFFER, ESQUIRE
SCHAFFER & SCHAFFER, ATTORNEYS AT LAW
328 Lafayette Street
New Orleans, LA 70130**