

IN THE DISTRICT COURT OF DOUGLAS COUNTY, NEBRASKA

KIM HAWLEY,)	Case No.
)	
)	
Plaintiff,)	
)	COMPLAINT
vs.)	
)	
JOHN SKRADSKI,)	
)	
Defendant.)	

COMES NOW the Plaintiff and for his causes of action states and alleges as follows:

1. That Plaintiff is a resident of Omaha, Douglas County, Nebraska. That at all times mentioned herein he was operating a business known as Town and Country Heating and Air Conditioning.
2. That the defendant is and was at all times relevant hereto a resident of Omaha, State of Nebraska, and was the previous owner of said business.
3. That Plaintiff purchased the business in 2008, and operated it through 2011. Mr. Skradski was affiliated with the seller of the business, and separately leased the premises to Plaintiff.
4. That when Plaintiff vacated the premises and was selling the business, Defendant took possession of the premises.
5. Unbeknownst to Plaintiff and without his authorization, Defendant began operating the business he had sold to Plaintiff in the same premises. He converted payments, work orders, business lists, contacts, contracts and the like, and converted various other assets of the business to his use, and concealed this from Plaintiff.
6. The removal of these assets from the business caused the value of the business to decrease, causing damage to the Plaintiff.

WHEREFORE Plaintiff prays that judgment be entered against Defendant for special damages to be established at trial, plus general damages in accordance with the laws of the State

of Nebraska that will fairly and adequately, but not excessively, compensate him for the nature and extent of his damages.

KIM HAWLEY, Plaintiff.

By: /s/ Scott Lautenbaugh
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