

IN THE COUNTY COURT OF WASHINGTON COUNTY, NEBRASKA

|                               |   |                  |
|-------------------------------|---|------------------|
| AMERICAN TIRE DISTRIBUTIONS , | ) | CASE NO.         |
|                               | ) |                  |
| Plaintiff,                    | ) |                  |
|                               | ) |                  |
| vs.                           | ) |                  |
|                               | ) | <b>COMPLAINT</b> |
| COUNTRY TIRE, INC,            | ) |                  |
|                               | ) |                  |
|                               | ) |                  |
| Defendant.                    | ) |                  |
|                               | ) |                  |

COMES NOW the Plaintiff, and for its cause of action against the Defendant, hereby alleges and states as follows:

1. Plaintiff is a corporation duly authorized to do business in the State of Nebraska.
2. Defendant is, and at all pertinent times hereto was, doing business in the county of WASHINGTON County, Nebraska.
3. Defendant is indebted to Plaintiff on open account the same originating from the furnishing of goods, wares, merchandise and/or services at Defendant's request.
4. Said indebtedness on account is for \$44,991.39, and no part or portion of same has been paid.
5. Due demand has been made upon Defendant more that ninety (90) days prior hereto, but no part or portion of same has been paid.
6. Defendant is not a member of the Armed Forces of the United States or of its Allies.



WHEREFORE, Plaintiff prays for judgment against the Defendant in the amount of \$44,991.39, plus pre-judgment interest thereon as allowed by law, court costs, and post judgment interest at the judicial rate.

DATED: February 1, 2019

AMERICAN TIRE DISTRIBUTIONS ,

By  \_\_\_\_\_

Kirk E. Brumbaugh, #16805

Karl Von Oldenburg, #20228

Jordan Heiliger, #26042

Brumbaugh & Quandahl, P.C.L.L.O.

14211 Arbor Street, Suite 100

Omaha, NE 68144

E-Mail: bqne@bqlaw.com

(402) 554-4400

ITS ATTORNEYS

**Aarika A. Wellnitz NE#26523**

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IN THE COUNTY COURT OF WASHINGTON COUNTY, NEBRASKA

AMERICAN TIRE DISTRIBUTIONS , )  
 )  
 ) Plaintiff, )  
 )  
 vs. )  
 )  
 ) COUNTRY TIRE, INC, )  
 )  
 )  
 ) Defendant. )  
 )

CASE NO.

PRAECIPE

TO THE CLERK OF SAID COURT:

Please issue summons for service upon the highest ranking officer or managing agent who may be found at the usual place of business, which is:

COUNTRY TIRE, INC  
RA: Roger Howland  
,1210 Grant St.  
Blair NE 68008

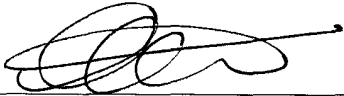
in the above entitled cause.

Please prepare summons for personal service by the Sheriff.

DATED: February 1, 2019

AMERICAN TIRE DISTRIBUTIONS ,  
Plaintiff

By

  
Kirk E. Brumbaugh, #16805  
Karl Von Oldenburg, #20228  
Don Furlow, #17833  
Aarika Wellnitz, #26523  
Jordan Heiliger, #26042  
Brumbaugh & Quandahl, P.C.L.L.O.  
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