

IN THE COUNTY COURT OF THE TWELFTH
JUDICIAL CIRCUIT, IN AND FOR MANATEE
COUNTY, FLORIDA.

CASE NO.: 2013CC954

INTERNATIONAL ENGINEERING
SERVICES, INC.,

Plaintiff,

v.

PAT COOK CONSTRUCTION, INC.,

Defendant.

FILED FOR RECORD
R.B. SHORE
2013 MAR 11 AM 11:09
CLERK OF CIRCUIT COURT
MANATEE CO., FLORIDA

COMPLAINT

Plaintiff, International Engineering Services, Inc. ("IES"), sues Defendant, Pat Cook Construction, Inc. ("Pat Cook"), and for its cause of action alleges:

1. This is an action for damages for more than \$5,000.00, but less than \$15,000.00, exclusive of interest, costs and attorney's fees.
2. IES is a Florida corporation with its principal place of business located in Orange County, Florida.
3. Pat Cook is a Florida corporation with its principal place of business located in Manatee County, Florida.
4. Venue of this action is proper in the courts located in Manatee County, Florida pursuant to the terms and conditions set forth in Exhibit "A" attached hereto.
5. On or about September 15, 2011, IES and Pat Cook entered into a written subcontract agreement for the furnishing and installation of certain structural and miscellaneous

steel, as set forth therein, for a construction project described as GFS Marketplace, OBT. A true and correct copy of the agreement is attached hereto as Exhibit "A":

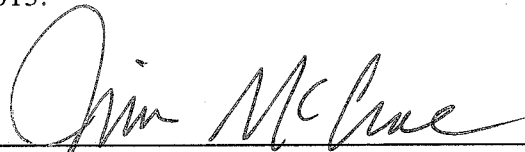
6. IES has fully performed all of its duties and obligations under Exhibit "A" and all conditions precedent to the maintenance of this action have occurred, been satisfied or have been waived.

7. Pat Cook has breached the terms of Exhibit "A" by failing and refusing to pay the sum of \$9,450.00 which remains past due and owing thereunder.

8. IES has retained the undersigned to represent it in this action and is obligated to pay them a reasonable fee for services herein for which Pat Cook is liable pursuant to the terms of Exhibit "A" and Florida Statute, Section 57.105(7).

WHEREFORE, International Engineering Services, Inc. demands judgment for damages, including prejudgment interest, costs and attorney's fees against Pat Cook Construction, Inc.

DATED this 4th day of March, 2013.



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