

MJAPC 102054.001

CAUSE NO. 22-05-05914

**VELOCITY INVESTMENTS, LLC**  
**Plaintiff**

vs.

**KEVIN LAIRD**  
**Defendant(s)**

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**IN THE DISTRICT COURT**

\_\_\_\_ **JUDICIAL DISTRICT**

**MONTGOMERY COUNTY, TEXAS**

Montgomery County - 284th Judicial District Court

**PLAINTIFF'S ORIGINAL PETITION**

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff **VELOCITY INVESTMENTS, LLC** files its Original Petition and would respectfully show the Court it is entitled to damages from Defendant(s) **KEVIN LAIRD**, as follows:

1. **VENUE AND PARTIES:** Under TRCP 190.2, Plaintiff requests that discovery be conducted under Level 1 discovery control plan.
2. Defendant **KEVIN LAIRD** is a resident of **MONTGOMERY** County, Texas and may be served with process at **128 APRIL WIND COURT, MONTGOMERY TX 77356**. **KEVIN LAIRD**'s Social Security #(last 4 digits): **\*\*\*-\*\*-2917**.
3. The amount in controversy is within the jurisdiction of this Court and appropriate for the requested discovery level. Venue for this case is proper in this County as it is the County where the Defendant(s) resides. Plaintiff seeks only monetary relief of \$100,000 or less, including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorney fees. All conditions precedent have been performed or have occurred.
4. **BREACH OF CONTRACT:** Defendant entered into a contract with the Original Creditor, which was **WebBank**, and resulted in a valid and enforceable contract under which the Original Creditor, which was extended credit to Defendant(s). Defendant's account bore the last four digits **XXX8670** ("Defendant's Account(s)"). Under the contract, Defendant purchased good and/or services. The Original Creditor fully performed under the contract. Defendant failed to perform under the agreement. After all just and due offsets

and credits, Defendant(s) owes Plaintiff on Defendant's Account(s). Defendant's breach of contract caused injury.

5. **ATTORNEYS' FEES:** Defendant's failure to re-pay the debt caused Plaintiff to employ the undersigned law firm. Under Texas CPRC Chapter 38, Plaintiff seeks recovery of its reasonable and necessary attorneys' fees.

6. Despite being presented with a demand for payment at least thirty (30) days prior to filing of this Case, Defendant(s) did not pay the amount owing.

7. **PRAYER:** WHEREFORE, premises considered, Plaintiff **VELOCITY INVESTMENTS, LLC** prays that this honorable Court grant judgment in favor of Plaintiff against Defendant **KEVIN LAIRD** for:

1. **\$18979.84** as the principle balance due;
2. costs of court;
3. post-judgment interest;
4. attorneys' fees; and
5. such other relief Plaintiff may be entitled at law or equity.

RESPECTFULLY SUBMITTED,

**MICHAEL J. ADAMS P.C.**



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