

JAN 24 PET  
 ct# 5765  
 DEPUTY CLERK OF COURT

**JOHN CAMPBELL DESIGN ASSOCIATES, LLC  
 AND THE LOUISIANA PURCHASE GROUP LLC**

DOCKET NO. 654716

DIV. \_\_\_\_\_

19<sup>TH</sup> JUDICIAL DISTRICT  
 COURT IN AND FOR THE  
 PARISH OF  
 EAST BATON ROUGE

STATE OF LOUISIANA

VERSUS

**SULAIMAN SALAH AND REALTY  
 INCOME CORPORATION**

PETITION

The petition of, **JOHN CAMPBELL DESIGN ASSOCIATES, LLC** a limited liability company domiciled in East Baton Rouge Parish, Louisiana, and **THE LOUISIANA PURCHASE GROUP LLC**, a limited liability company domiciled in East Baton Rouge Parish, Louisiana, represented herein by undersigned counsel, respectfully represents:

1.

**SULAIMAN SALAH**, an individual who is domiciled in the Parish of East Baton Rouge, State of Louisiana, owes petitioner **JOHN CAMPBELL DESIGN ASSOCIATES, LLC**, the sum of FIFTY-FOUR THOUSAND FOUR HUNDRED TWELVE AND 52/100 DOLLARS (\$54,412.52), plus legal interest from date of demand until paid, and attorneys fees for services rendered on behalf of defendant at his restaurant LAGNIAPPE ZACHARY, for which defendant owns the trademark.

2.

**SULAIMAN SALAH**, an individual who is domiciled in the Parish of East Baton Rouge, State of Louisiana, owes petitioner **THE LOUISIANA PURCHASE GROUP LLC**, the sum of TEN THOUSAND THREE HUNDRED SEVENTY-FIVE AND 72/100 DOLLARS (\$10,375.72), plus legal interest from date of demand until paid, and attorneys fees for materials sold to defendant for his restaurant LAGNIAPPE ZACHARY, for which defendant owns the trademark.

3.

**THE LOUISIANA PURCHASE GROUP LLC** also retains a vendor's privilege on all items sold to defendant for his restaurant LAGNIAPPE ZACHARY. The vendor's privilege is asserted against the immovable property which is owned by **REALTY INCOME CORPORATION**, a foreign corporation licensed to do business and doing business in the State of Louisiana.

REC'D C.P.

JAN 25 2017

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4.

LAGNIAPPE ZACHARY is located at 5755 Main Street in Zachary, Louisiana, which is located in East Baton Rouge Parish. Further, the contracts between plaintiffs and defendant were confected in East Baton Rouge Parish, Louisiana, which also gives jurisdiction to this court.

5.

All contracts between plaintiffs and defendant concerned the design and application of design to the one property for LAGNIAPPE ZACHARY located in East Baton Rouge Parish, Louisiana.

6.

All credits for payments made by defendant have been credited to the account prior to the filing of this petition.

7.

Petitioner has made demand on defendant for the open account, to no avail, as provided in LSA-R.S. 9:2781, more than thirty days prior to the filing of this petition, and is entitled to reasonable attorneys fees, as well as interest and court costs, for the prosecution of this suit. A copy of that demand is attached hereto and made a part thereof.

WHEREFORE, petitioners pray that there be judgment in their favor and against defendant, in the amounts listed above, plus legal interest from date of demand until paid, reasonable attorneys fees and all costs of this proceeding.

Respectfully submitted,

2017 JUN 24  
Kaulore



ANNA E. DOW  
Attorney for Plaintiffs  
Bar Roll Number 5040  
1434 North Burnside Avenue  
Suite 14  
Gonzales, Louisiana 70737 CIVIL  
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(225) 644-1860 (Facsimile)

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|---|--|
| <input type="checkbox"/> 03 PRISONER SUIT         | <input type="checkbox"/> 11-COMM. PROP. PARTITIONS |
| <input type="checkbox"/> 04-EXECUTORY PROCESS     | <input type="checkbox"/> 12-PUBLIC SERV. COMM.     |
| <input type="checkbox"/> 05-SUIT TO ADJUD.        | <input type="checkbox"/> 13-OTHER PARTITIONS       |
| <input type="checkbox"/> 06-EVICT.                | <input type="checkbox"/> 14-CONF.                  |
| <input type="checkbox"/> 07-WORKMENS COMPENSATION | <input type="checkbox"/> 15-CONF.                  |
| <input type="checkbox"/> 08-JUDICIAL REVIEW       | <input type="checkbox"/> 16-                       |
| <input type="checkbox"/> 09-PROPERTY RIGHTS       | <input type="checkbox"/> 17-                       |
| <input type="checkbox"/> 10-INJUNCTION MANDAMUS   | <input type="checkbox"/> 18-                       |
|   | <input type="checkbox"/> 19-                       |
|   | <input type="checkbox"/> 20-                       |

Please serve:

Sulaiman A. Salah  
Lagniappe Zachary  
5755 Main Street  
Zachary, LA 70791

and

Realty Income Corporation  
which may be served through its agent for service of process  
501 Louisiana Avenue  
Baton Rouge, Louisiana 70802

**JOHN CAMPBELL DESIGN ASSOCIATES, LLC  
AND THE LOUISIANA PURCHASE GROUP LLC**

DOCKET NO. 654716

**VERSUS**

DIV. \_\_\_\_\_  
**SEC. 23**

**SULAIMAN SALAH AND  
REALTY INCOME CORPORATION**

**19<sup>TH</sup> JUDICIAL DISTRICT  
COURT IN AND FOR THE  
PARISH OF  
EAST BATON ROUGE**

**STATE OF LOUISIANA**

**FILED: \_\_\_\_\_ : \_\_\_\_\_ DY.CLK.**

**NOTICE OF LIS PENDENS**

Please take notice that **THE LOUISIANA PURCHASE GROUP LLC**, petitioner in the above matter, has filed in the above numbered proceedings a petition to assert a vendors privilege against the immovable property belonging to defendant **REALTY INCOME CORPORATION** and occupied by **SULAIMAN SALAH**. That property is identified as follows:

A certain lot with improvements located in Ward 2-3 #5620, Lot: W-1-a, Subdiv: Montegudo, A. W.. Tract W-1-a, Cont. 2.769 Acres in Sec. 31, T4s, R1e & Sec. 6, T5s, R1e. Resub. Of Tract W-1 & the Remainder of a 1.3 Acre Tract, a Portion of A. W. Montegudo Property. Resub. 1996. Commercial.

Respectfully submitted,



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