

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT - LAW DIVISION

EDDY A. CURRY, an individual,)
)
 Plaintiff,)
)
 v.)
)
 LAMONT CARTER, an individual,)
)
 Defendants)

09CH21563

No. 2009 CH

COMPLAINT AT LAW

NOW COMES Plaintiff, Eddy A. Curry, an individual, by and through his attorneys, Belongia, Shapiro & Hynes, LLP, and for his Complaint seeking an Accounting against Defendant, Lamont Carter, an individual, and complains as follows:

PARTIES

1. At all relevant times, Plaintiff Eddy A. Curry (hereinafter "Plaintiff") was a resident of the village of Burr Ridge, Cook County, Illinois.
2. At all relevant times, Defendant Lamont Carter (hereinafter "Carter") was an individual and a sports agent, conducting business within the state of Illinois.

JURISDICTION AND VENUE

3. The transactions giving rise to this Complaint at Law transpired in Illinois making jurisdiction proper under 735 ILCS 5/2-209(a)(1), 735 ILCS 5/2-209(a)(7) and 5/2-209(b)(4) of the Illinois Code of Civil Procedure.

DOROTHY BROWN
CLERK

CIRCUIT COURT OF COOK
COUNTY, ILLINOIS
CHANCERY DIV.

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ACCOUNTING

4. This action requests an accounting of Plaintiff's finances from Defendant during the time Defendant acted as Plaintiff's agent/ business manager.

5. Plaintiff is an individual and is a professional basketball player.

6. Defendant is an individual and a sports agent and business manager.

7. From May 2005 through December 2008 Plaintiff employed Defendant as his agent and business manager.

8. During that time period Defendant handled all of Plaintiff's financial and business affairs and Defendant owed a fiduciary duty to Plaintiff.

9. Defendant maintained all of the books and records for Plaintiff during that time period.

10. Plaintiff, individually and through his authorized agents and representatives, has made multiple demands for an accounting from Defendant for the time period when Defendant was handling Plaintiff's financial and business affairs, and for the books and records.


11. Defendant produced some of the records requested but has failed and refused and continues to fail and refuse to provide a thorough accounting and all of the records demanded.

12. Although often requested by the Plaintiff to do so, the Defendant has failed, neglected, and refused and does now fail, neglect, and refuse to account to the Plaintiff for all money received by him and paid out by him.

WHEREFORE, Plaintiff, Eddy A. Curry prays that this court enter an order compelling Defendant to account for all transactions during the relevant time period and for any and all other relief this court deems just.

Respectfully submitted,

Eddy A. Curry

By: 
One of his attorneys

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