

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE DIVISION

KENDALL GARRETT MOSING and  
ZLOOP LA, LLC  
*Plaintiffs*

VERSUS

ROBERT "BOB" BOSTON, ROBERT  
"BOB" LaBARGE, ZLOOP, LLC,  
AND/OR ZLOOP, INC.,  
*Defendants*

CASE NO.: 6:14-cv-02608-RTH-PJH

JUDGE RICHARD T. HAIK, SR.

MAG. JUDGE PATRICK J. HANNA

JURY TRIAL DEMANDED

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**FIRST AMENDED COMPLAINT**

NOW INTO COURT, through undersigned counsel, come plaintiffs Zloop LA, LLC and Kendall G. Mosing to amend their original Complaint as set forth below.

I.

Rule 15 (a) of the Federal Rules of Civil Procedure entitles Plaintiffs to file this amendment without leave of court because the amendment is being filed within 21 days of the Complaint being served on defendants. Defendants were served *via* Louisiana long arm statute on September 5, 2014 by depositing into the United States mail a summons and certified copy of the Complaint to each Defendant at the service addresses indicated in the Complaint for each on September 5, 2014. *AIM Business Capital, LLC v. Reach Out Disposal, LLC*, Case 6:13-cv-00241, document 102.

II.

Plaintiffs seek to amend by adding paragraph 186.1 between existing paragraphs 186 and 187, as follows:

“186.1.

On September 5, 2014 the Louisiana Department of Justice issued the notice attached hereto as **Exhibit 46** to Defendants in response to the Plaintiffs’ unfair trade practice act claims being made herein. On information and belief, Defendants received the **Exhibit 46** notice on or about September 9, 2014.”

WHEREFORE, premises considered, Petitioners, Kendall Mosing and Zloop LA, LLC pray that this First Amended Complaint be filed, that Defendants Robert Boston, Robert LaBarge, Zloop, LLC and Zloop, Inc. be cited and summoned to answer same within the delays allowed by law; and for judgment in favor of the Petitioners and against Defendants, jointly and *in solido* for MOSING’s damages, plus treble damages, penalties, and judicial interest on all amounts awarded at the highest rate allowed by law from date of judicial demand until paid, attorney fees and all costs related to these proceedings. Plaintiffs renew all earlier prayers, including but not limited to Plaintiffs’ earlier prayers for judicial recognition of their security interest in the property described herein.

AND FOR ALL GENERAL AND EQUITABLE RELIEF, ETC.

Respectfully submitted,

ALLEN & GOOCH  
A Law Corporation

*/s/ JAMES H. GIBSON*

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Kendall G. Mosing and Zloop LA, LLC

### CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing FIRST AMENDED COMPLAINT was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record by operation of the Court's electronic filing system. The following parties were provided a copy via U.S. Mail and electronic mail:

1. Zloop, LLC and its successor, Zloop, Inc.  
Thru its co-founders and promoters  
Robert "Bob" Boston  
Robert "Bob" LaBarge  
816 13th Street NE  
Hickory, NC 28601  
Email: blabarge@zloop.com and bboston@zloop.com
2. Robert "Bob" LaBarge  
964 18<sup>th</sup> Avenue Cir NW  
Hickory, NC 28601-1200  
Email: blabarge@zloop.com
3. Robert "Bob" Boston  
15314 Priceville Road, Apartment 2  
Sparks Glencoe, Maryland 21152-9122  
Email: bboston@zloop.com

Lafayette, Louisiana, this 10<sup>th</sup> day of September, 2014.

*/s/ JAMES H. GIBSON*

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JAMES H. GIBSON