

COPY

IN THE CIRCUIT COURT FOR WILSON COUNTY, TENNESSEE
15th JUDICIAL DISTRICT AT LEBANON

JOHN RIAN EASON,)
)
 Plaintiff,)
)
 v.)
)
 KAITLYN HANKS and)
 WILLIAM SHOTACK,)
)
 Defendants.)

Case No. 2021-LV-517
JURY DEMAND (12)

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VERIFIED COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

Plaintiff, John Eason, by and through undersigned counsel, hereby files this Verified Complaint for Damages and Injunctive Relief for claims of libel, intentional infliction of emotional distress, and civil conspiracy against Defendants, Kaitlyn Hanks and William Shotack.

PARTIES

1. Plaintiff, JOHN RIAN EASON (hereinafter "Plaintiff") is a resident of Wilson County, Tennessee. Plaintiff is a veteran of the United States Air Force and has served on five (5) deployments overseas. Plaintiff is also an accomplished and talented singer-songwriter in the entertainment industry, and Plaintiff derives a significant portion of his income from performing at local venues throughout Tennessee, Georgia, North Carolina, South Carolina, Louisiana, Mississippi, Florida, Kentucky, Alabama, Virginia, and elsewhere in the United States.
2. Upon information and belief, KAITLYN HANKS (hereinafter "Defendant Hanks") is a resident of Wilson County, Tennessee. Upon information and belief, Defendant Hanks resides and can be served with process at 119 Belinda Parkway, Apt. A-116, Mount Juliet,

Tennessee 37122.

3. Upon information and belief, WILLIAM SHOTACK (hereinafter "Defendant Shotack") is a resident of Wilson County, Tennessee. Upon information and belief, Defendant Shotack was charged with a violation of Tenn. Code Ann. § 39-17-308 (Harassment) on October 28, 2021 (Wilson County General Sessions Court Case No. 95GS1-2021-CR-5260). Upon information and belief, and as will be more fully explained herein, Defendant Hanks and Defendant Shotack are partners in a civil conspiracy to defame, threaten, and harass Plaintiff.

JURISDICTION AND VENUE

4. This Court has jurisdiction over the subject matter of this action pursuant to Tenn. Code Ann. § 16-10-101.
5. Tenn. Code Ann. § 20-4-101(a) provides, "In all civil actions of a transitory nature, unless venue is otherwise provided for, the action may be brought in the country where the cause of action arose or in the country where the individual defendant resides." In this case, Defendant Hanks and Defendant Shotack's spreading of defamatory content on the internet regarding Plaintiff for view in Wilson County, Tennessee has caused Plaintiff to suffer injury in Wilson County, Tennessee, as Plaintiff conducts commercial activities in Wilson County, Tennessee and Plaintiff's reputational damage has largely accrued in Wilson County, Tennessee.
6. Moreover, upon information and belief, the ongoing threats being made against Plaintiff by Defendant Hanks and Defendant Shotack are being made within and received by Plaintiff in Wilson County, Tennessee.
7. In addition, upon information and belief, Defendant Shotack has, and continues to be,

coordinating with Defendant Hanks in Tennessee pursuant to a civil conspiracy to threaten Plaintiff and his career with the dissemination of defamatory content regarding Plaintiff online and elsewhere.

8. Therefore, venue is proper in Wilson County, Tennessee.

9. Tenn. Code Ann. § 20-2-223(a) states in part:

A court may exercise personal jurisdiction over a person, who acts directly or indirectly, as to a claim for relief arising from the person's: (1) Transacting any business in the state; (2) Contracting to supply services or things in the state; (3) Causing tortious injury by an act or omission in this state; [or] (4) Causing tortious injury by an act or omission outside this state of the person who regularly does or solicit business, or engages in any other persistent course of conduct, or derives substantial revenue from goods used or consumer or services rendered, in this state.

Tenn. Code Ann. § 20-2-223(a).

10. As will be more fully expounded by the Statement of Facts herein, this Court has personal jurisdiction over Defendant Hanks and Defendant Shotack pursuant to Tenn. Code Ann. § 20-2-223(a) because Defendant Hanks, acting in concert with Defendant Shotack, caused defamatory content regarding Plaintiff to be posted on the internet and to be primarily directed at Wilson County, Tennessee, and Defendant Hanks's concerted actions with Defendant Shotack continues to cause or threaten to cause tortious injury to Plaintiff's personal and professional reputation in Wilson County, Tennessee, through the publication of libelous statements for view in Wilson County, Tennessee and elsewhere, thereby giving rise to causes of action for libel, intentional infliction of emotional distress, and civil conspiracy.

11. In addition, upon information and belief and as is more fully expounded by the Statement of Facts herein, Defendants Hanks and Shotack have made or threatened to make several other defamatory postings on the internet on interactive websites primarily directed at

Wilson County, Tennessee.

12. Therefore, this Court has personal jurisdiction over Defendant Hanks and Defendant Shotack.

STATEMENT OF FACTS

13. Plaintiff is a talented and accomplished singer-songwriter, as well as Veteran and Father, who has worked, *inter alia*, as a performer and musician in the State of Tennessee since October 2018.
14. Beginning in approximately July 2021, Defendants have engaged in a conspiracy and malicious campaign to malign, tarnish, and destroy Plaintiff's reputation through the publication of false and defamatory content regarding Plaintiff on the internet and elsewhere. Through the publication and dissemination of baseless lies regarding Plaintiff to the local community and beyond, Defendants' malevolent crusade against Plaintiff is intended to irreparably damage Plaintiff's personal and professional reputation and his music career.
15. Plaintiff and Defendant Hanks became acquainted at T.J. Courtney's Restaurant and Catering ("Courtney's Restaurant"), located at 4066 N. Mt. Juliet Rd, Mt. Juliet, Tennessee 37122. Plaintiff worked as a waiter at Courtney's Restaurant from 2018 until approximately February 2020, at which time he voluntarily resigned his position on amicable terms. In the Spring of 2019, during the period of Plaintiff's employment at Courtney's Restaurant, Plaintiff's friend, Glen Hanks, introduced him to his daughter, Defendant Hanks.
16. Following their initial acquaintance in the Spring of 2019, Plaintiff would show that he and Defendant Hanks occasionally spent time together over the period of approximately the

next one (1) year. Plaintiff would show that he and Defendant Hanks were sexually intimate on a handful of occasions, and that on December 12, 2020, Defendant Hanks gave birth to Plaintiff's son, Benjamin Rain Hanks (the "Minor Child").

17. Plaintiff would show that, throughout Defendant Hanks's pregnancy with the Minor Child and for several months following the birth of the Minor Child, Defendant Hanks regularly sought to establish and maintain a serious romantic relationship with Plaintiff. Plaintiff would show that he attempted to maintain an amicable association with Defendant Hanks during this time for the sake of the Minor Child, but that he was ultimately compelled to discontinue such attempts in May 2021, in part due to Defendant Hanks's tendencies to engage in uncontrollable outbursts. Plaintiff would show that Defendant Hanks is diagnosed with bipolar disorder and obsessive-compulsive disorder, and is prescribed anti-psychotic medication. However, upon information and belief, Defendant Hanks does not regularly take said medication as prescribed, thereby exacerbating her mental health problems and frustrating the treatment regimen prescribed by her therapist.

18. On November 8, 2021, Plaintiff initiated custody proceedings concerning the Minor Child in the Juvenile Court for Wilson County, Tennessee (Case No. 21-JV-293) (the "Custody Proceedings"), with the filing of his Petition to Establish Paternity and Parenting Plan. Defendant Hanks was personally served with process in the Custody Proceedings on November 11, 2021. Currently, there are no Orders entered in the Custody Proceedings.

19. Plaintiff would show that he initiated the Custody Proceedings because Defendant Hanks refused to allow Plaintiff access to the Minor Child after he made it clear to Defendant Hanks in May 2021 that he was not interested in a serious romantic relationship with her.

20. Beginning in July 2021, approximately two (2) months after Plaintiff terminated his

association with Defendant Hanks, Defendant Hanks began a malicious, intentional, and egregious campaign designed to harm Plaintiff by repeatedly defaming him on social media and elsewhere.

21. Plaintiff would show that the impetus for Defendant Hanks commencing the malicious campaign against Plaintiff originated through statements conveyed to her by Defendant Shotack surrounding Plaintiff's previous employment at Courtney's Restaurant.
22. Plaintiff would show that, at all times relevant to this Verified Complaint for Damages and Injunctive Relief, Defendant Hanks and Defendant Shotack have been friends.
23. Plaintiff would show that Defendant Shotack was previously employed at Courtney's Restaurant after Plaintiff departed from the company in approximately February 2020.
24. Plaintiff would show that, while Defendant Shotack was employed at Courtney's Restaurant, Defendant Shotack developed romantic feelings for a young female employee named Alexandra Szumski.
25. Plaintiff would show that Ms. Szumski was his co-worker during his period of employment at Courtney's Restaurant.
26. Plaintiff would show that, at some point during Defendant Shotack's employment at Courtney's Restaurant (which never coincided with Plaintiff's employment at Courtney's Restaurant), Defendant Shotack, through his attempts to form a romantic relationship with Ms. Szumski, learned that Ms. Szumski was acquainted with Plaintiff by virtue of Plaintiff previously being her co-worker.
27. Plaintiff would show that, after learning Plaintiff had previously worked with Ms. Szumski, and out of frustration of Ms. Szumski's lack of romantic interest in Defendant Shotack, Defendant Shotack informed Defendant Hanks that Plaintiff was acquainted with Ms.

Szumski and falsely implicated that the reason Plaintiff refused to form a serious romantic relationship with Defendant Hanks was because Plaintiff had previously engaged in a romantic and sexual relationship with Ms. Szumski.

28. Plaintiff would show that he has never, at any point, engaged in or attempted to engage in any kind of romantic, intimate, or sexual relationship with Ms. Szumski at any time.
29. Following Defendant Hanks learning that Plaintiff was acquainted with Ms. Szumski, Plaintiff would show that Defendant Hanks – without any factual basis or evidence whatsoever – proceeded to report Plaintiff to law enforcement and accused Plaintiff of providing Ms. Szumski with intoxicating liquors and having sexual intercourse with Ms. Szumski when she was still a minor.
30. Plaintiff would show that these accusations by Defendant Hanks are spurious and completely false. Moreover, Plaintiff would show that law enforcement subsequently questioned Ms. Szumski regarding Defendant Hanks's accusations against Plaintiff, and Ms. Szumski completely denied ever having consumed intoxicating liquors with Plaintiff or having sexual intercourse with Plaintiff at any time.
31. Upon information and belief, Defendants' malicious campaign against Plaintiff is motivated in part by Defendant Hanks's desire to retaliate against Plaintiff for his refusal to enter into a serious romantic relationship with her and also Defendant Shotak's jealousy towards Plaintiff and his romantic feelings for Ms. Szumski.
32. Plaintiff would show that, on or about July 2021, Defendant Hanks began to author posts on Facebook from her personal account on pages created for residents of Mount Juliet to keep them informed about the community. A copy of this post is attached as Exhibit A.
33. Plaintiff would further show that the Facebook post directly identifies Plaintiff by stating,

"To anyone who follows or supports John Rian Eason and his music I would just like you to know he slept with a 17yr old girl last year." The post goes on to falsely accuse Plaintiff of "statutory rape" and refers to Plaintiff to be included in a group of "older men who prey on young women." **Exhibit A.**

34. Upon information and belief, Defendant Hanks authored the post on Facebook with the intention that the post be seen by the community of Mount Juliet, the music industry, and the public at large, and this and other subsequent Facebook posts by Defendant Hanks reached a public audience of several thousand people.

35. These statements are false and defamatory, and there is no evidence of the conduct Plaintiff is alleged to have committed occurring.

36. Plaintiff would show that Defendant Hanks, Defendant Shotack, or both, acting in concert and pursuant to a common and coordinated scheme to defame Plaintiff, authored several posts on the social media outlet Instagram containing false allegations against Plaintiff, including through the use of pseudonymous accounts. A copy of these posts is attached as **Exhibit B.**

37. Upon information and belief, Defendants authored the aforementioned posts on Instagram with the intention that the posts be seen by the Plaintiff's professional and business contacts within the music industry and the public at large.

38. Plaintiff would further show that the aforementioned Instagram posts directly identify Plaintiff by alleging that Plaintiff, once again, "likes to give 16- and 17-year-old girls liquor and have sex with them when they are too drunk and vulnerable to stop it."

39. These statements are false and defamatory, and there is no evidence of the conducted Plaintiff is alleged to have committed occurring.

40. Plaintiff would also show that Defendant Hanks, Defendant Shotack, or both, authored a website entitled "<https://johneasonpedo.com/>" containing several baseless, false and defamatory allegations about Plaintiff. A copy of the website's contents is attached as **Exhibit C.**

41. Upon information and belief, Defendant Hanks, Defendant Shotack, or both, created and authored the website entitled <https://johneasonpedo.com/> with the intention that it be viewed by Plaintiff's professional and business contacts within the music industry and the public at large.

42. Plaintiff would show the website "<https://johneasonpedo.com/>" directly identifies Plaintiff by stating "Get to know John rian Eason" and "molesting and destroying lives" on the homepage. The website also contains a photo gallery containing screenshots of text messages claiming – without evidence – that Plaintiff has engaged in sexual intercourse with minors, screenshots of the aforementioned Instagram posts, and what appears to be a picture of a police report with several words and sentences redacted. The legible words include Plaintiff's name, the date it was written, June 16, 2021, and a sentence stating "John Eason had a sexual relationship with . . . sometime during 2020 at an unknown location. Ms. ____ [Szumski] was seventeen years of age prior to 5-21-2020."

43. Plaintiff would further show that the aforementioned website falsely accuses Plaintiff of these acts. There is no evidence of these acts occurring, and Plaintiff unequivocally denies these allegations. Furthermore, no charges have been brought against Plaintiff.

44. Upon information and belief, Defendant Shotack was charged with a violation of Tenn. Code Ann. § 39-17-308 (Harassment) on October 28, 2021 (Wilson County General Sessions Court Case No. 95GS1-2021-CR-5260). A copy of the Affidavit of Complaint

from this action is attached as **Exhibit D**. Plaintiff would show that Defendant Shotack was charged with a violation of Tenn. Code Ann. § 39-17-308 (Harassment) following his repeated, unwanted communications directed towards Ms. Szumski. Indeed, Plaintiff would show that, like Ms. Szumski, he has become a victim of incessant, unrelenting, unwanted, and outrageous harassment by Defendant Shotack on the internet and elsewhere.

45. Moreover, and egregiously, Defendants also contacted, though private message and email (including through the use of pseudonymous email accounts), multiple local music performance venues throughout Tennessee and other States where Plaintiff was scheduled to perform, to publish false and defamatory allegations about Plaintiff and sabotage Plaintiff's business operations. A copy of some of these emails and messages is attached as **Exhibit E**.

46. Upon information and belief, Defendants authored these emails and messages under the name "Tyler," or requested an unidentified individual author the emails and messages for them, with the intention to halt and/or ruin Plaintiff's musical career.

47. Plaintiff would show that the emails and messages contain extremely similar, almost identical, language to the aforementioned Instagram posts. The message states "John Rian Eason likes to give 16- and 17-year-old girls liquor and have sex with them when they are too drunk and vulnerable to stop it . . . If he has assaulted you as well please come forward." The email states "John rian eason is a child molester." **Exhibit E**.

48. In addition, Plaintiff would show that Defendants have also contacted numerous members of his family and other individuals associated with him, including, but not limited to, Plaintiff's uncle, Plaintiff's father, Plaintiff's mother, Plaintiff's ex-wife, and Plaintiff's ex-girlfriend, all to publish and spread the aforementioned false and defamatory allegations

about Plaintiff in an attempt to intimidate and harass Plaintiff.

49. Once more, Plaintiff would show that the allegations contained in these messages and emails to various local music performance venues are demonstrably false and completely unfounded.
50. Since Defendants wrote these harmful statements and disseminated or caused them to be disseminated for public consumption, Plaintiff would show that he has received numerous resentful personal messages through social media which have upset Plaintiff greatly and caused him emotional distress. Plaintiff would show that such messages are the natural and probable consequence of Defendants' malicious campaign designed to defame Plaintiff and falsely portray Plaintiff as being involved in sexual relations with minor children.
51. Defendants' statements regarding Plaintiff have wrongfully directed anger, blame, and frustration towards Plaintiff and damaged Plaintiff's reputation and business interests.
52. Defendants' statements regarding Plaintiff have also caused Plaintiff to receive threats on his own life.
53. Plaintiff avers that such communications are the direct and probable consequence of Defendants' malicious campaign to defame Plaintiff, and that the intentional spreading of such harmful misinformation by Defendants is but one of Defendants' aims in attacking Plaintiff and attempting to destroy his professional and personal life.
54. Plaintiff's reputation has already been significantly damaged by Defendants' defamation of his character and the damage to Plaintiff's reputation has diminished his future earning capacity.
55. Plaintiff's business operations have already been negatively impacted by Defendants' untruthful statements due to a decreased trust of Plaintiff among the music industry and the

community at large.

56. Plaintiff has suffered immense and immeasurable reputational harm due to Defendants' baseless and false accusations.

57. In addition to reputational and professional harm, Plaintiff has suffered extreme mental anguish and emotional distress due to Defendant's defamatory attacks, particularly in light of Plaintiff suffering from post-traumatic stress disorder (PTSD) as a result of his eight (8) years of military service.

CASUES OF ACTION

COUNT I: DEFAMATION – LIBEL

(AGAINST ALL DEFENDANTS)

58. Plaintiff incorporates each of the preceding paragraphs (1-57) as if each is fully set forth herein.

59. Defendant Hanks and Defendant Shotack have repeatedly and knowingly published false statements about Plaintiff and his supposed involvement in sexual relations with a previous female co-worker before she was of the age of majority. These statements include, but are not limited to:

- a. Defendant Hanks's statement that "anyone who follows or supports John Rian Eason and his music I would just like you to know he slept with a 17-year-old girl last year."
- b. Defendant Hanks's statement that "John Rian Eason also [is] a womanizer [who] likes to sleep with 17-year-old girls. I think its disgusting you are supporting him."
- c. Defendant Hanks's statement that Plaintiff "sleeps with everything that walks and

gets [people] pregnant . . . He is spreading STDs. Please stop supporting this disgusting man.”

d. Upon information and belief, Defendants’ statement from an Instagram Account “blasted615” that “John Rian Eason likes to give 16- and 17-year-old girls liquor and have sex with them when they are too drunk and vulnerable to stop it.”

e. Upon information and belief, Defendants’ statement from a website entitled “johneasonpedo.com” that “John Eason is [P]edo molesting kids destroying lives.”

f. Upon information and belief, Defendants’ statement from an Instagram Account “justice_for_teens_” that “John Rian Eason it’s [T]ime to answer for your sins.” This statement accompanies a picture of a representation of Plaintiff hung from both hands from a tree. A copy of this is attached as **Exhibit F**.

g. Upon information and belief, Defendants’ statements to several music performance venues that “John rian eason is a child molester” and that “John Rian Eason likes to give 16- and 17-year-old girls liquor and have sex with them when they are too drunk and vulnerable to stop it.”

60. Defendant Hanks, along with Defendant Shotack, caused these statements to be published to, and subsequently circulated by, various social media websites and platforms, including Facebook, Instagram, and Twitter, thereby damaging Plaintiff’s reputation and standing within the community and the entertainment industry.

61. Both Defendants’ statements about Plaintiff were made with knowledge the statements were false or with reckless disregard for the truth.

62. As a direct and proximate result of both Defendant Hanks and Defendant Shotack’s false

and defamatory statements, Plaintiff has suffered a loss in performance opportunities, professional cultivation and reputational standing, decreased future earning power, and serious mental and emotional injury in the form of extreme public embarrassment, stress, anxiety, and fear.

63. Defendant Hanks and Defendant Shotack's statements about Plaintiff are defaming to Plaintiff and are designed to damage both his personal and professional reputations.

64. Defendant Hanks and Defendant Shotack's defamatory statements have caused severe mental anguish to the Plaintiff.

65. Defendant Hanks and Defendant Shotack's defamatory statements have damaged Plaintiff's personal and professional reputation.

COUNT II: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

(AGAINST ALL DEFENDANTS)

66. Plaintiff incorporates each of the preceding paragraphs (1-57) as if each is fully set forth herein.

67. The actions of Defendant Hanks, along with Defendant Shotack, in orchestrating and propagating an intentional, coordinated, and malicious campaign to defame Plaintiff before the entertainment industry and the public at large have been designed to intentionally inflict mental anguish and severe emotional distress upon Plaintiff, as well as tarnish Plaintiff's reputation within the singer-songwriter community and jeopardize Plaintiff's future earning capacity, through the publication of highly offensive material on the internet, social media outlets, and elsewhere.

68. Defendants' conduct in orchestrating and carrying out their malicious campaign against Plaintiff is so extreme and outrageous that it is not tolerated by civilized society.

69. As a result of Defendant Hanks and Defendant Shotack's conduct in defaming Plaintiff before the entertainment community and the public at large, Plaintiff has suffered serious mental injury and emotional distress.

COUNT III: CIVIL CONSPIRACY

(AGAINST ALL DEFENDANTS)

70. Plaintiff incorporates each of the preceding paragraphs (1-57) as if each is fully set forth herein.

71. Based on the timing, nature, and substantive content found within the various communications between Defendant Hanks and Plaintiff and Defendant Shotack and Plaintiff, Defendants have acted with a common design to accomplish the unlawful purpose of tortiously defaming and threatening to defame Plaintiff by concerted action for the purpose of destroying Plaintiff's professional music reputation and career.

72. Defendants' repeated insistence of the truth of Plaintiff's alleged sexual relationships with minors, both in social media posts and private messaging exchanged with Plaintiff, coupled with Defendants' hostility and increasing threats towards Plaintiff when such alleged relationships are written about, also demonstrate a coordinated series of attacks and actions between and among Defendants to defame and tortiously injure Plaintiff throughout the internet and in person for the purpose of destroying Plaintiff's professional music reputation and career.

73. Plaintiff has suffered damages, including damage to his personal and professional reputations, as a result of the conspiracy to defame Plaintiff between Defendant Hanks and Defendant Shotack.

PUNITIVE DAMAGES

74. Plaintiff incorporates each of the preceding paragraphs (1-57) as if each is fully set forth herein.

75. Defendants have acted maliciously, intentionally, fraudulently, or recklessly by attempting to ruin Plaintiff's personal and professional reputations through a calculated scheme to defame Plaintiff by falsely publicizing that Plaintiff has engaged in sexual relationships with minors.

76. Defendants' actions in repeatedly uttering false and offensive defamatory comments about Plaintiff through various social media sites and private messaging show a consistent pattern of intentional and malicious acts continuing to the present.

77. At the very least, Defendants' actions constitute reckless conduct in that Defendants should have known that there was no factual basis for most, if not all, of the statements made by Defendants.

78. As a result of Defendants' malicious, intentional, fraudulent, or reckless actions, Plaintiff is entitled to punitive damages equal to the greater of two (2) times the total amount of compensatory damages awarded or \$500,000.000.

APPLICATION FOR TEMPORARY RESTRAINING ORDER

79. Plaintiff incorporates each of the preceding paragraphs (1-57) as if each is fully set forth herein.

80. Plaintiff holds a reasonable belief that Defendant Hanks and Defendant Shotack, upon being served with process regarding this lawsuit, will publish the events, communications, identity of Plaintiff, and other material at the center of this controversy in retaliation upon receiving notice of this cause. In addition, Defendants have also made violent threats, directly or indirectly, to Plaintiff in the past. Additionally, Defendants

have repeatedly contacted members of Plaintiff's family and other associates of Plaintiff for the purpose of defaming, intimidating, and harassing Plaintiff. Therefore, Plaintiff maintains that a temporary restraining order is necessary.

81. Pursuant to Tenn. R. Civ. P. 65, Plaintiff seeks a temporary restraining order, followed by a temporary injunction stating the following:

- a. Restraining Defendant Shotack, and any person or entity acting in concert with him, from contacting or otherwise communicating with Plaintiff, Plaintiff's family members, Plaintiff's co-workers or employees, neighbors, known friends, or any other professional contacts Plaintiff has arising out of his employment, either directly or indirectly, by phone, email, text messages, mail, private messages on social media, or any other type of communication or contact;
- b. Restraining Defendant Hanks, and any person or entity acting in concert with her, from contacting or otherwise communicating with Plaintiff's family members (except Benjamin Rain Hanks), Plaintiff's co-workers or employees, neighbors, known friends, or any other professional contacts Plaintiff has arising out of his employment, either directly or indirectly, by phone, email, text messages, mail, private messages on social media, or any other type of communication or contact;
- c. Restraining Defendant Hanks, Defendant Shotack, and any person or entity acting in concert with them from publishing any defamatory statements regarding Plaintiff or any statements concerning Plaintiff's private affairs and concerns on the internet, orally, or through any other medium of communication; and
- d. Restraining Defendant Hanks, Defendant Shotack, and any person or entity acting in concert with them from publishing libelous or slanderous statements regarding

Plaintiff to any other individual(s) or entities.

82. If Defendants are not restrained and enjoined from contacting or otherwise communicating with Plaintiff's family members, Plaintiff's co-workers or employees, neighbors, known friends, or any other professional contacts Plaintiff has arising out of his employment, either directly or indirectly, by phone, email, text messages, mail, private messages on social media, or any other type of communication or contact, Plaintiff will suffer immediate and irreparable injury.
83. If Defendants are not restrained and enjoined from publishing any defamatory statements regarding Plaintiff to any other individual(s) or entities, Plaintiff will suffer immediate and irreparable injury.
84. Plaintiff has no adequate remedy at law.

PRAYERS FOR RELIEF

WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully requests the following relief:

1. That proper process issued and be served on Defendants, and that Defendants be required to answer this Verified Complaint for Damages and Injunctive Relief within the time required by law;
2. That Plaintiff be allowed to amend this Verified Complaint for Damages and Injunctive Relief as justice requires or as this lawsuit progresses and more evidence is procured in the discovery process;
3. That Plaintiff be awarded judgement in his favor on all accounts of this Verified Complaint for Damages and Injunctive Relief in such sums that shall be determined to fully and fairly compensate Plaintiff for all general, special, incidental, and consequential

- damage incurred, or to be incurred, by Plaintiff, but in no event an amount less Seven Hundred Fifty Thousand Dollars (\$750,000.00);
4. That Plaintiff be awarded punitive damages against Defendants upon an evidentiary showing of Plaintiff's entitlement to the same;
 5. That Plaintiff be given a trial by a 12-person jury on all issues and claims so triable;
 6. That Plaintiff be awarded a temporary restraining order, followed by a temporary injunction, against Defendants as set forth herein;
 7. That Plaintiff be awarded a permanent injunction at the conclusion of this cause against Defendants as set forth herein in Plaintiff's Application for Temporary Restraining Order;
 8. That Plaintiff be awarded pre- and post-judgment interest;
 9. That Plaintiff be awarded reasonable attorney's fees and costs, including court costs; and
 10. That Plaintiff be awarded any further and general relief deemed appropriate by this Court.

THIS IS PLAINTIFF'S FIRST REQUEST FOR EXTRAORDINARY RELIEF.

Respectfully submitted,




Andy Goldstein, Esq., BPR # 037042
Scarlett Sloane, Esq., BPR # 039556
COLE LAW GROUP, P.C.
1648 Westgate Circle, Suite 301
Brentwood, TN 37027
Telephone: (615) 326-5430
Fax: (615) 942-5914
agoldstein@colelawgrouppe.com
ssloane@colelawgrouppe.com
Attorneys for Plaintiff

[VERIFICATION PAGE TO FOLLOW]

VERIFICATION

STATE OF Tennessee)
COUNTY OF Williamson)

I, JOHN EASON, being first duly sworn according to law, make oath that I have read the foregoing Verified Complaint, know the contents thereof, and that the same is true and correct to the best of my knowledge, information and belief.



JOHN EASON

SWORN TO AND SUBSCRIBED before me this the 18th day of November 2021.



NOTARY PUBLIC

My Commission Expires: 11/08/2022

