

Respectfully Submitted,

s/Jeremiah J. Shellenberg

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Columbia, South Carolina
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ATTORNEYS FOR PLAINTIFF

STATE OF SOUTH CAROLINA)
)
 COUNTY OF RICHLAND)
)
)
 Michelle and Fred Layman)
)
)
 Plaintiffs,)
)
 v.)
)
 Town of Blythewood, Mayor Sloan)
 Griffin in his Individual Capacity,)
)
 Defendants.)
)

IN THE COURT OF COMMON PLEAS
 FOR THE FIFTH JUDICIAL CIRCUIT

Civil Action No. 2025-CP-40

**COMPLAINT
 (Jury Trial Demanded)**

The Plaintiffs, by and through their undersigned counsel, complaining of the Defendants above-named, asserts the following and would respectfully show this Honorable Court:

PARTIES, JURISDICTION, AND VENUE

1. Plaintiffs Michelle and Fred Layman are citizens and residents of Richland County, South Carolina.
2. Defendant Town of Blythewood (hereinafter “Town”) is a municipality in Richland County, South Carolina and political subdivision of the State of South Carolina within the meaning of the South Carolina Tort Claims Act, S.C. Code Ann. §§ 15-78-10 *et seq.* of the South Carolina Code of Laws, which makes the employing entity liable for the torts of its employees (S.C. Code § 15-78-70); and the Town, its mayor, and its town council were responsible for the management and operation of the Town and the management and supervision of its officers, agents, employees, and officials. Plaintiffs allege the Town is liable for the acts and omissions of its agents, employees, and officials, including such acts and omissions which occurred prior, during, and subsequent to the unlawful confinement, detainment, harassment, citation, and/or prosecution –

amongst other things – of Plaintiff Michelle Layman and/or the Plaintiffs. Plaintiffs allege the Town employees, officers, and officials acted within the course and scope of their official duties as agents, officers, and officials of the Town of Blythewood with respect to the claims.

3. Defendant Sloan Griffin (hereinafter “Defendant Griffin”) is the Mayor of Blythewood and is a citizen and resident of Richland County, South Carolina. At all times relevant to this action, Defendant Griffin was the duly elected Mayor of the Town of Blythewood, authorized pursuant to Town ordinances to enforce and carry out his official duties, including the management and operation of the Town and its employees, and he acted under the color of state law and in the course and scope of his duties.

4. Town of Blythewood is a mayor-council form of municipal government, commonly known as the “strong mayor form.”

5. Pursuant to South Carolina Code § 5-9-30, The mayor shall be the chief administrative officer of the municipality. He shall be responsible to the council for the administration of all city affairs placed in his charge by or under Chapters 1 through 17. He shall have the following powers and duties:

(1) to appoint and, when he deems it necessary for the good of the municipality, suspend or remove all municipal employees and appointive administrative officers provided for by or under Chapters 1 through 17, except as otherwise provided by law, or personnel rules adopted pursuant to Chapters 1 through 17. He may authorize any administrative officer who is subject to his direction and supervision to exercise these powers with respect to subordinates in that officer's department, office or agency;

(2) to direct and supervise the administration of all departments, offices and agencies of the municipality except as otherwise provided by Chapters 1 through 17;

(3) to preside at meetings of the council and vote as other councilmen;

(4) to act to insure that all laws, provisions of Chapters 1 through 17 and ordinances of the council, subject to enforcement by him or by officers subject to his direction and supervision, are faithfully executed;

(5) to prepare and submit the annual budget and capital program to the council;

(6) to submit to the council and make available to the public a complete report on the finances and administrative activities of the municipality as of the end of each fiscal year; and

(7) to make such other reports as the council may require concerning the operations of municipal departments, offices and agencies subject to his direction and supervision.

6. Town of Blythewood Code Sec. 32.01(B) provides the mayor may establish such additional positions as he or she deems necessary to effectively and efficiently carry out his or her duties and responsibilities as chief administrative officer of the town.

7. Town of Blythewood Code Sec. 32.02(C) provides the mayor may appoint persons to the positions established by the mayor under section 32.01(B) and, when he or she deems it necessary for the good of the town, suspend and remove such persons from such positions.

8. Town of Blythewood Code Sec. 32.03E(1) provides the assignment of duties and lines of supervision for all personnel positions established under section 32.01(B) shall be the responsibility of the mayor.

9. At all times described herein, Defendant Griffin, Walt Davis, and Jennifer Edwards were acting in the course and scope of their employment and in their respective capacities as elected or appointed officials and/or employees of the Town of Blythewood.

10. At all times described herein, Defendant Griffin was Mr. Davis and Mrs. Edwards supervisor with the power to remove or suspend Mr. Davis and Mrs. Edwards pursuant to the South Carolina Code and Town of Blythewood Code of Ordinances.

11. Upon information and belief, agents and/or employees of the Defendant Town, which had the right and/or power to direct and control the manner in which their employees and/or agents executed their duties.

12. The negligent, grossly negligent, and/or reckless acts, omissions and liability of the Town includes its agents, principals, employees, officers, officials, and/or servants, both directly and vicariously, pursuant to principals of non-delegable duty, corporate liability, apparent authority, agency, ostensible agency and/or *respondeat superior*.

13. This Court has jurisdiction over the subject matter of this action pursuant to the common and statutory law of South Carolina, including but not limited to Article V, § 11 of the South Carolina Constitution and South Carolina Code §15-78-10 et seq., more commonly known as the South Carolina Torts Claims Act. Jurisdiction and venue are founded upon the above common law and statutory provisions, including South Carolina Code § 15-7-30, and the Defendants' acts and omissions giving rise to this complaint occurred in Richland County, South Carolina.

14. Defendant(s) are jointly and severally liable for all damages alleged herein because their negligent, grossly negligent, reckless and wanton acts and omissions, singularly or in combination, are the direct and proximate cause of Plaintiffs' damages, injuries, and losses.

GENERAL ALLEGATIONS

15. Plaintiffs reassert and incorporate by reference the allegations contained in the preceding and subsequent paragraphs as fully as if repeated verbatim herein.

16. Doko Manor is a public building located in Blythewood, South Carolina.

17. Doko Manor is open to the public Monday through Friday from 9 a.m. to 5 p.m.

18. The incident described herein was captured on security camera. **See Exhibit A.**

19. On September 11, 2025, Plaintiff Michelle Layman, and her infant child, entered Doko Manor at approximately 4 p.m., while the building was still open to the public.

20. Plaintiff attempted to drop off a check on behalf of her husband, Plaintiff Fred Layman.

21. Mr. Layman is the Director of Operations for Doko Manor and Doko Meadows Park.

22. Mr. Layman was unable to deliver the check himself because he was undergoing cancer treatments.

23. When Plaintiff arrived, she attempted to drop the check off with Kim Kacsur, Assistant Director at Doko Manor.

24. Mrs. Kacsur was in a closed-door meeting at the time, so Plaintiff waited patiently outside.

25. After waiting for some time, and unsure how long the meeting would last, Plaintiff slid the check and documents under Mrs. Kacsur's door to ensure it was received prior to the close of business.

26. While Plaintiff was waiting outside Mrs. Kacsur's door, Defendant Griffin became aware of her presence and closely watched her.

27. After delivering the check to Mrs. Kacsur, Defendant Griffin demanded that she retrieve the check.

28. Plaintiff politely refused to retrieve the check because any issue Defendant Griffin had should be taken up with Fred.

29. Defendant Griffin became increasingly insistent that Plaintiff retrieve the check.

30. Plaintiff, not wanting to argue with Defendant Griffin and needing to pick up her other children, attempted to leave Doko Manor.

31. As one of multiple and separate acts of negligence, Defendant Griffin instructed Walt Davis, an employee of Defendant Town, that Plaintiff and her infant child were not allowed to leave unless she took the check with her.

32. As a separate and distinct act of negligence from which a separate unfolding sequence of events proximately flowed, and in response to Defendant Griffin's instruction(s), Mr. Davis stood at the door to Doko Manor, held the door shut so Plaintiff and her infant child could not leave, and confined her within the building.

33. As she pleaded with Mr. Davis to let her leave, Defendant Griffin continued instructing Mr. Davis that Plaintiff was not allowed to leave.

34. As Defendant Griffith and Mr. Davis unlawfully detained Plaintiff, Town of Blythewood human resources and finance director, Jennifer Edwards, walked over and personally observed what had transpired; however, as a separate and distinct act of negligence from which a separate unfolding sequence of events proximately flowed, Jennifer Edwards neither said nor did anything to intervene in the unlawful seizure of Plaintiff and her infant child.

35. Upon information and belief, and as yet another separate and distinct act of negligence from which a separate unfolding sequence of events proximately flowed, Mrs. Edwards subsequently aided and/or facilitated the continued the false imprisonment of Plaintiff and guarded a hallway which led to another potential exit and further restrained Plaintiff.

36. For an extended period, Defendant Town employees and officials forcibly blocked the exits to ensure Plaintiff and her infant child were not free to leave.

37. As additional, multiple, and separate acts of negligence, Defendant Town employees and officials initiated an unlawful seizure and imprisonment of Plaintiff and her infant child, continued the unlawful seizure and imprisonment of Plaintiff and her infant child, and

repeatedly failed to terminate the unlawful seizure and imprisonment of Plaintiff and her infant child.

38. As a separate and distinct act of negligence from which a separate unfolding sequence of events proximately flowed, no other Defendant Town employees responded to intervene in Plaintiff's unlawful seizure / false imprisonment.

39. Plaintiff developed hypertension during her pregnancy and takes medication to manage her symptoms.

40. The longer Plaintiff was held against her will, the stress and fear for her safety and that of her infant child exponentially increased, causing her to suffer emotional and physical distress, including shortness of breath, headache, and chest pains.

41. Mr. Davis and Defendant Griffin, two men significantly larger and more imposing than Plaintiff, continued to block and hold the door closed so she could not leave. The continued false imprisonment of Plaintiff made her increasingly distressed and afraid, not only for herself, but her infant child.

42. The stress from Mr. Davis and Defendant Griffin's actions exacerbated Plaintiff's hypertension.

43. Plaintiff informed Defendant Griffin and Mr. Davis of her heart condition and pled with them to allow her to go outside, get air, and retrieve her medication in her vehicle.

44. Plaintiff needed the medicine to control her hypertension and the longer she went without it the more dangerous it could be for her.

45. As a separate and distinct act of negligence from which a separate unfolding sequence of events proximately flowed, Defendant Griffin refused to allow Plaintiff access to her medication or walk outside.

46. As a separate and distinct act of negligence from which a separate unfolding sequence of events proximately flowed, Mr. Davis refused to allow Plaintiff access to her medication or walk outside. At one point, Plaintiff tried to push past Mr. Davis and get outside, but he pulled the door shut and cut off any attempt to exit.

47. As a separate and distinct act of negligence from which a separate unfolding sequence of events proximately flowed, Mrs. Edwards failed to intervene and assist Plaintiff gain her freedom and access to her critical medication.

48. With her physical symptoms increasing in severity, Plaintiff made a desperate call to Fred to plead for help.

49. Mr. Layman immediately called 911 and told the dispatcher that his wife was essentially being held hostage by Defendant Griffin at Doko Manor.

50. As a separate and distinct act of negligence from which a separate unfolding sequence of events proximately flowed, Defendant Griffin failed to call 911, render aid, or otherwise seek emergency medical attention for Plaintiff.

51. As a separate and distinct act of negligence from which a separate unfolding sequence of events proximately flowed, Mr. Davis failed to call 911, render aid, or otherwise seek emergency medical attention for Plaintiff.

52. As a separate and distinct act of negligence from which a separate unfolding sequence of events proximately flowed, Mrs. Edwards failed to call 911, render aid, or otherwise seek emergency medical attention for Plaintiff.

53. As a separate and distinct act of negligence from which a separate unfolding sequence of events proximately flowed, no other Defendant Town employees responded to intervene, render aid, call 911, or otherwise seek emergency medical attention for Plaintiff.

54. As Plaintiff waited for someone to come to rescue her from Mr. Davis, Defendant Griffin, and Mrs. Edwards, her shortness of breath, headache, and chest pain continued to increase.

55. Although Plaintiff was clearly in both emotional and physical distress and in need of medical attention, and as one of multiple and separate acts of negligence from which a separate unfolding sequence of events proximately flowed, Defendant Griffin, Mr. Davis, and/or Mrs. Edwards both individually and collectively refused to allow Plaintiff and her infant child to go outside.

56. Finally, law enforcement and firefighters arrived at Doko Manor. The firefighters gave Plaintiff oxygen to support her until Emergency Medical Services (hereinafter "EMS") arrived.

57. Upon information and belief, Mr. Davis, Defendant Griffin, and/or Mrs. Edwards only stopped blocking the door when Richland County Sheriff's Department officers, firefighters, and EMS arrived at Doko Manor.

58. Plaintiff was able to give her infant child to a trusted family friend, but because of her significant chest pains, headache, and shortness of breath, EMS insisted she be transported immediately to the hospital for evaluation.

59. EMS transported Plaintiff to MUSC where, upon admission, doctors immediately noted she was hypertensive with a blood pressure of approximately 192/100.

60. Plaintiff was admitted with symptomatic uncontrolled hypertension and ultimately diagnosed with a heart attack.

61. As a separate and distinct act of negligence from which a separate unfolding sequence of events proximately flowed, Plaintiff suffered a heart attack as a direct and proximate

result of the multiple, separate, and distinct actions and omissions of the above-referenced Defendant Town and its employees.

62. At Doko Manor, Defendant Griffin told Richland County Sheriff's Department officers that Plaintiff entered the property without proper authorization and created a disturbance.

63. According to other Town of Blythewood officials, Plaintiff had the right to enter Doko Manor, just like any other citizen has a right to enter a public building.

64. Upon information and belief, RCSD officers issued Plaintiff a trespass notice based upon Defendant Griffin's misrepresentations.

65. Consequently, officers put Plaintiff on trespass notice from Doko Manor. After suffering at the hands of multiple Defendant Town employees, suffering a wrongful imprisonment, suffering a heart attack, suffering from other various acts and omission of the Defendant Town, and upon her discharge from the hospital, Plaintiff found the trespass notice in her infant child's stroller.

66. The negligent, reckless, and grossly negligent conduct, acts, and omissions for which the Defendant(s) are liable includes multiple separate acts and omissions by multiple agents, employees, officers, and/or officials and constitutes multiple occurrences within the scope of the South Carolina Tort Claims Act, the exact number of which should be determined by the finder of fact. Because the above-described incidents and allegations involve numerous separate acts and/or omissions, including but not limited to the failure to properly hire, train, supervise, intervene, discipline, and/or terminate the employment of the individuals who committed the various negligent, reckless, and grossly negligent acts or omissions on the part of the Defendant(s), Plaintiffs have alleged multiple "occurrences" as to all Defendants pursuant to *Chastain v. Anmed*

Health Found., 388 S.C. 170 (2010) and *Boiter v. SCDOT*, 393 S.C. 123 (2011) for the purpose of calculating the applicable damages caps, if any.

AS A FIRST CAUSE OF ACTION
(GROSS NEGLIGENCE/NEGLIGENCE – DEFENDANT TOWN OF
BLYTHEWOOD)

67. Plaintiffs repeat and re-allege all preceding paragraphs as though fully set forth herein.

68. Plaintiffs further alleges that Defendant is responsible for the conduct alleged herein which directly and proximately caused harm to Plaintiff Michelle Layman, as well as the conduct of their agents, servants, and/or employees who acted within the course and scope of their employment, as set forth above; said conduct being grossly negligent, willful and reckless, including, among others, without limit:

- a. By failing to hire adequate and proper personnel;
- b. By failing to establish a policy or practice that would lead to the discovery of the misconduct by their employees and prevent the same from occurring;
- c. By employing and continuing to employ the above-referenced Town of Blythewood employees (other than the Mayor, who was elected) when they knew or should have known of their propensity to improperly handle their duties;
- d. By failing to properly monitor Town of Blythewood employees;
- e. By failing to intervene and stop the unlawful and unreasonable detention of the Plaintiff unsupported by probable cause;
- f. By failing to understand, apply, and/or comply with the policies, procedures, and laws that governed the Plaintiff's detention, arrest, and/or prosecution;
- g. By failing to enforce its own codes, regulations, and procedures;
- h. By failing to comply with industry standards;
- i. By hiring and retaining the officials and employees who deviated from the policies and procedures which caused Plaintiff to suffer unlawful and unreasonable detention;
- j. The failure to put in place adequate policies and procedures to follow to prevent conduct such as that exhibited in this case from taking place;
- k. The failure to implement adequate security or safety measures designed to prevent or substantially reduce the likelihood that the Plaintiff or others similarly situated would be subject to the same acts of harassment, assault, abuse, and/or wrongful detention;
- l. The failure to protect the Plaintiff from the above-referenced individuals and from unlawful and unreasonable seizures;

- m. The failure to enforce policies prohibiting mistreatment of citizens;
- n. The failure to have and/or implement special policies regarding the treatment of citizens wrongfully detained;
- o. The failure to properly hire, train, monitor, and supervise employees;
- p. By failing to terminate the officials and employees whose acts and omissions committed under the color of state law proximately caused Plaintiff to suffer harm;
- q. By wrongfully detaining Plaintiff and/or continuing to detain Plaintiff;
- r. By failing to act as a reasonably prudent person would under the circumstances;
- s. By failing to act as a reasonably prudent supervisor would under the circumstances;
- t. By failing to act as a reasonably prudent official would under the circumstances;
- u. By failing to intervene as a reasonably prudent person would under the circumstances;
- v. By failing to intervene as a reasonably prudent employee would under the circumstances;
- w. By failing to intervene as a reasonably prudent supervisor would under the circumstances;
- x. By failing to intervene as a reasonably prudent official would under the circumstances;
- y. For creating an unreasonably unsafe environment that allowed and caused the harm complained of herein; and
- z. In such other ways as will be proven in discovery and at trial.

69. All of the above acts and/or omissions are in violation of the common laws and statutes of the State of South Carolina, as well as the Defendant's obligation and duties to Plaintiff.

70. The Defendant owed these duties to Plaintiff and breached these duties via acts and omissions complained of herein. Plaintiff seeks damages against the Defendant for the actual and consequential damages proximately caused by these breaches of duty, in an amount to be determined by a jury. Alternatively, Plaintiff further seeks punitive damages against any individual Defendant should it be alleged or shown that any such individual employee or official of the Town acted outside the course and scope of their employment.

71. The negligent, reckless, and grossly negligent conduct, acts, and omissions for which the Defendant is liable includes multiple separate acts and omissions by multiple agents, employees, officers, and/or officials of multiple actors and/or entities and constitutes multiple occurrences within the scope of the South Carolina Tort Claims Act, the exact number of which

should be determined by the finder of fact. Because the above-described incidents and allegations involve numerous separate acts and/or omissions, including but not limited to the failure to properly hire, train, supervise, intervene, discipline, and/or terminate the employment of the individuals who committed the various negligent, reckless, and grossly negligent acts or omissions on the part of the Defendants, Plaintiffs have alleged multiple “occurrences” as to all Defendants pursuant to *Chastain v. Anmed Health Found.*, 388 S.C. 170 (2010) and *Boiter v. SCDOT*, 393 S.C. 123 (2011) for the purpose of calculating the applicable damages caps, if any.

72. As the direct and proximate result of the negligence, gross negligence, carelessness, recklessness, and failure of one or more of the Defendants to use the appropriate care under the circumstances, Plaintiffs’ injuries and damages include but are not limited to embarrassment, humiliation, fear, horror, depression, mental anguish, loss of freedom, loss of quality of life, anxiety, emotional distress, economic damages, as well as personal and professional reputational damages, for which the Plaintiffs are entitled to recover in an amount to be determined by a jury at the trial of this action.

AS A SECOND CAUSE OF ACTION

(DEFAMATION- DEFENDANT TOWN OF BLYTHEWOOD AND DEFENDANT GRIFFIN,
IN HIS INDIVIDUAL CAPACITY)

73. Plaintiffs repeat and re-allege all preceding paragraphs as if fully set forth herein.

74. The statements and actions made by the Defendant Griffin, acting in his capacity as Mayor of Town of Blythewood, during and after Plaintiff’s unlawful detention as to Plaintiff’s character, and as to her being a trespasser, were false publications wrongly accusing Plaintiff. These statements were defamatory *per se*. Defendants’ false statements also tended to subject Plaintiff to ridicule, contempt, disgrace, suffering, anguish, horror, nervousness, grief, anxiety, worry, shock, humiliation, and shame. Those slanderous statements were false when made, were

made without regard to their truth or falsity, were made without justification, and were made for the purpose and intent of damaging the reputation of Plaintiff or with reckless disregard of their effect on Plaintiff's reputation.

75. Alternatively, if it is shown that Defendant Griffin was acting outside the course and scope of his employment and/or with actual malice, Plaintiff Michelle Layman asserts Defendant Griffin is liable in his individual capacity for the statements and actions made by the Defendant Griffin during and after Plaintiff's unlawful detention as to Plaintiff's character, and as to her being a trespasser, were false publications wrongly accusing Plaintiff. These statements were defamatory *per se*. Defendants' false statements also tended to subject Plaintiff to ridicule, contempt, disgrace, suffering, anguish, horror, nervousness, grief, anxiety, worry, shock, humiliation, and shame. Those slanderous statements were false when made, were made without regard to their truth or falsity, were made without justification, and were made for the purpose and intent of damaging the reputation of Plaintiff or with reckless disregard of their effect on Plaintiff's reputation.

76. Those statements have impeached, injured, and damaged Plaintiff.

77. As actual and proximate cause of Defendant Griffin's conduct in making such false statements, Plaintiff has sustained harm, including general and special damages in the amount to be determined at trial.

78. Defendant Griffin acted willfully and/or wantonly in making the statements described above.

79. At all times Defendant Griffin was acting in his capacity as Mayor of Town of Blythewood.

80. As a result of the acts and omissions of Defendants, Plaintiff is entitled to actual and punitive damages in an amount to be determined by a jury.

AS A THIRD CAUSE OF ACTION

(FALSE ARREST/FALSE IMPRISONMENT - DEFENDANT TOWN OF BLYTHEWOOD)

81. Plaintiffs repeat and re-allege all preceding paragraphs as though fully set forth herein.

82. Defendant, acting jointly and in concert, and through its employees and agents, through their words and acts, falsely imprisoned and detained the Plaintiff during the above-described times.

83. Beginning at the time Defendant unlawfully detained Plaintiff Michelle Layman at Doko Manor through the time of Plaintiff's left by ambulance, Defendant restrained Plaintiff and imprisoned him.

84. The restraint of Plaintiff by Defendant was intentional.

85. The restraint of Plaintiff by Defendant was without sufficient probable cause.

86. The restraint of Plaintiff by Defendant was unlawful, as there was no probable cause or justification for Defendants to restrain Plaintiff, imprison Plaintiff, and hold him against his will.

87. As a result of the Defendant's detaining, and imprisoning Plaintiff, Plaintiff has suffered injury and damages, including not limited to embarrassment, medical damages humiliation, mental anguish, loss of freedom, loss of quality of life, anxiety, distress, suffering, fright, horror, nervousness, grief, worry, fear, shock, shame, depression, and emotional distress.

88. As a result of the acts and omissions of Defendant, Plaintiff is entitled to actual and punitive damages in an amount to be determined by a jury.

AS A FOURTH CAUSE OF ACTION

(ABUSE OF PROCESS – DEFENDANT TOWN OF BLYTHEWOOD)

89. Plaintiffs repeat and re-allege all preceding paragraphs as though fully set forth herein.

90. The Defendant, acting jointly and in concert, and through its employees and agents, willfully and with an ulterior purpose used the legal process against Plaintiff Michelle Layman, which constitutes actionable abuse of process under South Carolina law.

91. The Plaintiffs suffered great harm as a proximate result of the Defendant's abuse of process.

AS A FIFTH CAUSE OF ACTION

(LOSS OF CONSORTIUM – ALL DEFENDANTS)

92. Plaintiffs repeat and re-allege all preceding paragraphs as though fully set forth herein.

93. At all times relevant and material to this action, Fred Layman was the lawful husband of Michelle Layman.

94. As a direct and proximate result of the negligent, grossly, negligent, reckless, willful and wanton acts previously set forth on the part of the Defendants, Michelle Layman suffered severe, permanent and painful injuries, causing Mr. Layman to be deprived of the companionship, aid, society and services of his wife; that further, Mr. Layman is informed and believes that he will continue to suffer losses and damages as a result of these injuries in the future, all to his loss and damage in a sum to be determined by the jury for both actual and punitive damages.

95. Plaintiffs demand a jury trial of these causes of action as contemplated by Rule 38(b), SCRPC.

DAMAGES

96. As a proximate result of Defendants actions and omissions, the Plaintiffs suffered some or all of the following injuries and damages:

- a. Past, present, and future emotional distress;
- b. Loss of freedom;
- c. Loss of time;
- d. Loss of enjoyment of life;
- e. Restriction of movement;
- f. Physical manifestation of emotional distress;
- g. Damage to her reputation;
- h. physical pain and suffering;
- i. Punitive damages;
- j. Other general and special damages;
- k. All other available past and future economic and noneconomic damages,
and
- l. Other damages as will be shown through discovery and at trial.

WHEREFORE, Plaintiffs respectfully prays that the Court enter judgment against the Defendants for Plaintiffs' damages in an amount to be determined by a jury, for the reasonable costs of this action, for interest, for all other available damages under applicable law, and for such other relief as the Court deems just and proper.

Signature Block on Following Page

Respectfully Submitted,

s/Jeremiah J. Shellenberg

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