

STATE COURT OF CHATHAM COUNTY

133 MONTGOMERY STREET, SUITE 308, SAVANNAH, GEORGIA 31401
TELEPHONE: (912) 652-7224 • FACSIMILE: (912) 652-7229

2009 JUN 16 PM 4:38

RECEIVED FOR FILING
STATE COURT CLERK
CHATHAM CO GA

Brian K. Hart

COLLEEN GRIER as Next Friend of
KAITLYN GRIER, a Minor,

Plaintiffs,

v.

CIVIL ACTION NO. **STCV0902353**

STEPHANIE BRITT and
CHEER SAVANNAH, INC.

SERVE: Stephanie Britt
81 Woodchuck Hill Road
Savannah, GA 31405

Defendants.

SUMMONS

TO THE ABOVE NAMED DEFENDANT: **Stephanie Britt**

You are hereby summoned and required to file with the Clerk of said Court and serve upon Plaintiff's Attorney, whose name and address is:

C. Dorian Britt, Esq.
R. Bartley Turner, Esq.
Savage, Turner, Pinson & Karsman
304 East Bay Street
Savannah, Georgia 31401

Christian J. Steinmetz III.
Gannam, Gnann & Steinmetz LLC
Post Office Box 10085
Savannah, Georgia 31412-0285

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, Judgment by default will be taken against you for the relief demanded in the complaint.

This 16th day of June, 2009.

Brian K. Hart, Clerk of Court
State Court of Chatham County, Georgia

By: *Ami Stewart*
Deputy Clerk, State Court of Chatham County Georgia

** also serving with Complaint:*

*Plaintiff's First Interrogatories to Defendants, Notice to Take Deposition (Stephanie Britt)
Plaintiff's First Request for Production of Documents to Defendants, Plaintiff's First Request to Admit to Stephanie Britt*

STATE COURT OF CHATHAM COUNTY

133 MONTGOMERY STREET, SUITE 308, SAVANNAH, GEORGIA 31401
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Brian K. Hart

COLLEEN GRIER as Next Friend of
KAITLYN GRIER, a Minor,

Plaintiffs,

v.

CIVIL ACTION NO. STCV0902353

STEPHANIE BRITT and
CHEER SAVANNAH, INC.

Defendants.

SERVE: Cheer Savannah, Inc.
By and through its Registered Agent
Stephanie Britt
81 Woodchuck Hill Road
Savannah, GA 31405

SUMMONS

TO THE ABOVE NAMED DEFENDANT: **Cheer Savannah, Inc.**

You are hereby summoned and required to file with the Clerk of said Court and serve upon Plaintiff's Attorney, whose name and address is:

C. Dorian Britt, Esq.
R. Bartley Turner, Esq.
Savage, Turner, Pinson & Karsman
304 East Bay Street
Savannah, Georgia 31401

Christian J. Steinmetz III.
Gannam, Gnann & Steinmetz LLC
Post Office Box 10085
Savannah, Georgia 31412-0285

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, Judgment by default will be taken against you for the relief demanded in the complaint.

This 16th day of June, 2009.

Brian K. Hart, Clerk of Court
State Court of Chatham County, Georgia

By: *Amy Stenard*
Deputy Clerk, State Court of Chatham County Georgia

** also serving with Complaint:*

*Plaintiff's First Interrogatories to Defendants, Notice to Take Deposition (Stephanie Britt)
Plaintiff's First Request for Production of Documents to Defendants, Plaintiff's First Request to Admit to Stephanie Britt*

IN THE STATE COURT OF CHATHAM COUNTY
STATE OF GEORGIA

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Brian K. Short

COLLEEN GRIER as Next Friend of)
KAITLYN GRIER, a Minor,)
)
Plaintiffs,)
)
vs.)
)
STEPHANIE BRITT and)
CHEER SAVANNAH, INC.,)
)
Defendants.)

Civil Action No.

COMPLAINT

COMES NOW Colleen Grier, as Next Friend of Kaitlyn Grier, a minor, and files this her Complaint against Defendants Stephanie Britt and Cheer Savannah, Inc. as follows:

I. PARTIES, JURISDICTION AND VENUE

1. Plaintiff Colleen Grier is a citizen and resident of Bryan County, Georgia.

2. Defendant Stephanie Britt is a citizen and resident of Chatham County, Georgia and may be served with process at 81 Woodchuck Hill Road, Savannah, Chatham County, Georgia 31405.

3. Defendant Cheer Savannah, Inc. is a Georgia corporation that may be served with process through its registered agent, Stephanie Britt, located at 81 Woodchuck Hill Road, Savannah, Chatham County, Georgia 31405.

4. Jurisdiction and venue are proper in this Honorable Court.

II. FACTUAL ALLEGATIONS

5. Plaintiff Colleen Grier is the natural parent of Kaitlyn (“Katie”) Grier, who is presently 16 years old.

6. Until November 2008, Kaitlyn Grier was a member of a competitive cheerleading team organized by Defendant Cheer Savannah, Inc.

7. Defendant Britt is the president of Cheer Savannah and is the head cheerleading coach.

8. At some time prior to November 19, 2008, Defendant Britt became aware of photos that had been posted on the internet depicting several teenage team members of Cheer Savannah engaged in the apparent act of smoking marijuana from a soda can.

9. While Katie appeared in a few of the pictures, she is not seen smoking any substance or otherwise doing anything illegal.

10. On November 19, 2008, Katie attended a practice session at Cheer Savannah along with approximately 20 other members of Cheer Savannah.

11. On this date, Defendant Britt made several false and disparaging remarks about Katie Grier and her family in front of her fellow Cheer Savannah members.

12. Defendant Britt also verbally threatened Katie Grier with bodily harm and made gestures indicating that she would follow through with her threat.

13. As a result of Defendant Britt’s conduct, Katie Grier has been defamed, assaulted and has suffered severe emotional distress for which she is entitled to compensation.

III. CAUSES OF ACTION

Count I - Slander/Slander Per Se

14. The statements made by Defendant Britt towards Katie Grier on November 19, 2008 were false, improper and without privilege.

15. Such statements included imputations that Katie Grier had committed a crime punishable by law and/or that she was guilty of some debasing act which may exclude her from society.

16. Defendant Britt has committed slander and/or slander *per se* against Katie Grier, the damages for which Defendants are liable.

Count II - Intentional Infliction of Emotional Distress

17. The statements made by Defendant Britt towards Katie Grier on November 19, 2008 were made recklessly or intentionally to embarrass, humiliate, degrade, slander and/or ridicule her in front of her peers.

18. Such statements were extreme, severe and outrageous.

19. As a proximate result of such statements and the context in which they were made, Plaintiff has suffered severe emotional distress.

Count III - Assault

20. During Defendant Britt's tirade towards Katie Grier on November 19, 2008, she threatened to "bitch slap" Katie.

21. At the time that Defendant Britt made this threat, she raised her hand and lunged

toward Katie Grier as if to strike her.

22. Such words and actions caused Katie Grier to reasonably believe that Defendant Britt would cause her imminent physical harm.

23. As a result of such fear, Katie Grier has suffered emotional distress.

24. Defendant Britt's statements and actions constitute assault for which Katie Grier is entitled to compensation.

Count IV - Respondeat Superior

25. At all times relevant to this Complaint, Defendant Britt was acting on behalf of Defendant Cheer Savannah.

26. Defendant Cheer Savannah is liable for the behavior of Defendant as set forth in the Complaint under the doctrine of *respondeat superior*.

Count V - Attorneys' Fees and Litigation Expenses

27. Defendants have acted in bad faith, have been stubbornly litigious, and/or have caused Plaintiff unnecessary trouble and expense, thereby by entitling Plaintiff to recover attorneys' fees and expenses pursuant to O.C.G.A. § 13-6-11.

Punitive Damages

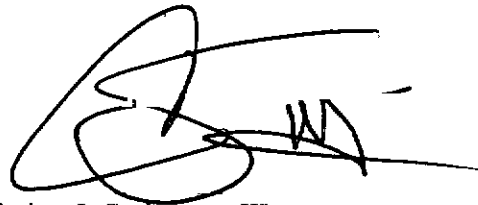
28. Defendants' conduct toward Katie Grier constitutes an intentional tort and evidences willful misconduct, malice, fraud, wantonness, oppression, or that entire want of care which would raise the presumption of conscious indifference to consequences, thereby entitling

Plaintiff to recover punitive damages against Defendants pursuant to O.C.G.A. § 51-12-5.1.

WHEREFORE, Plaintiff prays:

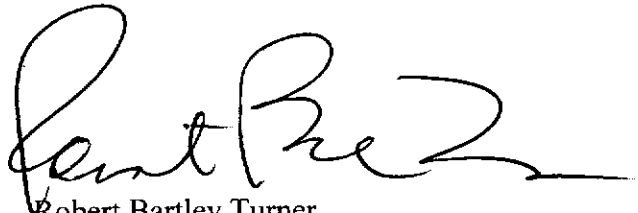
- (A) That Summons and Process be issued and served upon Defendants;
- (B) For a trial by jury;
- (C) That Plaintiff, on behalf of daughter, be awarded an appropriate sum to compensate for her injuries and damages;
- (D) That the Plaintiff be awarded punitive damages against Defendants in an amount sufficient to penalize, punish and/or deter Defendants from such conduct in the future;
- (E) For recovery of attorneys' fees and all costs of litigation against Defendants; and
- (F) That Plaintiff recover such other and further relief as this Court deems just and proper.

THIS 16 day of June, 2009.



Christian J. Steinmetz III
Georgia Bar No. 278260

GANNAM, GNANN & STEINMETZ LLC
Post Office Box 10085
Savannah, Georgia 31412-0285
(912) 232-1192



Robert Bartley Turner
Georgia Bar No. 006440
C. Dorian Britt
Georgia Bar No. 083259

SAVAGE, TURNER, PINSON & KARSMAN
304 East Bay Street
Savannah, Georgia 31412-10600
(912) 231-1140

IN THE STATE COURT OF CHATHAM COUNTY
STATE OF GEORGIA

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Brian K. Skiff

COLLEEN GRIER as Next Friend of
KAITLYN GRIER, a Minor,

Plaintiffs,

vs.

STEPHANIE BRITT and
CHEER SAVANNAH, INC.,

Defendants.


Civil Action No.

NOTICE TO TAKE DEPOSITION

To: **STEPHANIE BRITT**
81 Woodchuck Hill Road
Savannah, Georgia 31405.

PLEASE TAKE NOTICE that on August 7, 2009, beginning at 10:00 a.m., at the law offices of Savage, Turner, Pinson & Karsman, 304 East Bay Street, Savannah, GA 31401 the Plaintiff in the above-styled action will proceed to take deposition of **Defendant Stephanie Britt** upon oral deposition, before a notary public or some other person authorized to administer oaths. The deposition will be taken for discovery and all other purposes allowable under the Georgia Civil Practice Act.

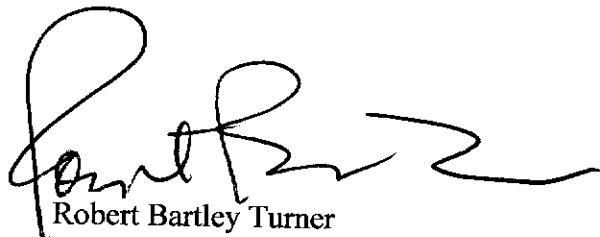
This 14 day of June, 2009.


Robert Bartley Turner
Georgia Bar No. 006440

SAVAGE, TURNER, PINSON & KARSMAN
Post Office Box 10600
Savannah, Georgia 31412
(912) 231-1140

6. It is admitted that in front of others you stated on November 19, 2009 that you heard that Kaitlyn Grier was the best blow job in Savannah.
7. It is admitted that your intent in making statements regarding Kaitlyn Grier on November 19, 2009 was to adversely affect Kaitlyn Grier
8. It is admitted that on November 19, 2009 in front of others you accused Kaitlyn Grier of using marijuana.
9. It is admitted that your adverse statements about Kaitlyn Grier in the past twelve months has caused damage to her in excess of \$500,000.00

THIS 16th day of June, 2009.



Robert Bartley Turner
Georgia Bar No. 006440

SAVAGE, TURNER, PINSON & KARSMAN
Post Office Box 10600
Savannah, Georgia 31412
(912) 231-1140

IN THE STATE COURT OF CHATHAM COUNTY
STATE OF GEORGIA

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Brian H. Short

COLLEEN GRIER as Next Friend of)
KAITLYN GRIER, a Minor,)
)
Plaintiffs,)
)
vs.)
)
STEPHANIE BRITT and)
CHEER SAVANNAH, INC.,)
)
Defendants.)

Civil Action No.

PLAINTIFF'S FIRST INTERROGATORIES TO DEFENDANT

COMES NOW the Plaintiff in the above-styled case, and requires the Defendant to answer under oath and in writing the following interrogatories, pursuant to O.C.G.A. § 9-11-33 within forty-five (45) days from the date of service hereof.

NOTE A: When used in these interrogatories, the phrases "Defendant", "individual in question", "you", or any synonym thereof are intended to and shall embrace and include, in addition to Defendant, individually, Defendant's attorneys, agents, servants, employees, representatives, private investigators, insurance adjusters, and all others who are in possession of, in control of, or may have obtained information for or on behalf of Defendant.

NOTE B: Throughout these interrogatories, wherever Defendant is requested to identify a communication or any type and such communication was oral, the following information should be furnished with regard to each such communication:

- (a) By whom it was made, and to whom;
- (b) The date upon which it was made;

- (c) Who else was present when it was made;
- (d) Whether it was recorded or described in any writing of any type, and if so, identification of each such writing in the manner indicated in Note C below.

NOTE C: Throughout these interrogatories, wherever Defendant is requested to identify a communication, letter, documents, memorandum, report, or record of any type and such communication was written, the following information should be furnished:

- (a) A specific description of its nature (e.g., whether it is a letter, a memorandum, etc.);
- (b) By whom it was made and whom it was addressed;
- (c) The date upon which it was made; and
- (d) The name and address of the present custodian of the writing or, if not known, the name and address of the present custodian of a copy thereof.

NOTE D: Throughout these interrogatories, wherever Defendant is requested to identify a person, the following information should be furnished:

- (a) The person's full name;
- (b) His or her present home and business address and telephone number at each address;
- (c) His or her occupation; and
- (d) His or her place of employment.

NOTE E: These interrogatories shall be deemed continuing to the extent required by law. You are required to (1) reasonably supplement any response directed to the identity and location of persons having knowledge of discoverable matters as well as the identity of each

person expected to testify and the substance of his testimony; (2) amend any prior response if you subsequently learn that the original response was incorrect or if you learned that although correctly made, the original response is no longer true and the circumstances are such that a failure to amend the response is, in substance, a knowing concealment; and (3) provide such other supplementary responses required by law.

NOTE F: If the Defendant asserts a privilege concerning any tangible objects, correspondence, memorandum or other documentation, Defendant should furnish a privilege log which includes the following information:

- (A) a brief summary of the document;
- (B) the author of the document;
- (C) the recipient of the document;
- (D) the date the document was drafted; and
- (E) any date the document was remitted to another.

INTERROGATORIES

1. Please state the names, addresses, and telephone numbers of all witnesses that have knowledge of any fact which your defense is based upon.
2. Please identify the contents of any and all statements which you have made over the twelve (12) months prior to May 25, 2007 regarding Colleen Grier.
3. Please identify the contents of any and all statements which you have made over the twelve (12) months prior to May 25, 2007 regarding Kaitlyn Grier.
4. Please identify the contents of any and all statements which you have made over the twelve (12) months prior to May 25, 2007 regarding the family of Kaitlyn Grier.
5. Set forth with specificity all facts that support your defense of the claims against you in

the above-styled matter.

7. Please identify all persons you have communicated with between May 25, 2008 and May 25, 2009 regarding Colleen Grier, Kaitlyn Grier or the Grier family or its members.

Please include telephone number and last known address.

8. If you contend that some other person or legal entity is, in whole or in part, liable to the Plaintiff in this matter, state its full name, address and telephone number and describe in detail the basis of such liability.
9. Set forth the names and addresses of all insurance companies which have liability insurance coverage relating to the matter alleged in the complaint, the number or numbers of such policies, the amount of liability coverage provided in each policy, and the named insured in the same.
10. Do you contend that Kaitlyn Grier contributed in any way to the happening of the events referred to in the Complaint? If so, please state with specificity each and every factor on which you base this allegation.
11. With regard to any witness which you expect to call as an expert witness at trial, please state the experts' name and business address, the subject matter on which the expert is expected to testify, the substance of the facts and opinions to which the expert is expected to testify, a summary of the grounds for each opinion, whether such expert has furnished you or your attorneys with a written report and if so, the date of such report and the person having possession and control of the report, and the date on which the expert was first retained.
12. With respect to any affirmative defense which you have raised in your defensive pleadings, please state each and every fact upon which you rely in support of the

same.

13. If Defendant has ever been involved in any other legal action, criminal or civil, similar to the events complained of, please state the date and place each such action was filed, giving the name of the court, the name of the other party or parties involved, the number of such actions and the names of the attorneys representing each party, a description of the nature of each such action, and the result of each such action, whether there was an appeal and the result of the appeal and whether such case was reported and the name, volume number and page citation of such report.
14. Please identify each and every person who has assisted in the answer of these interrogatories.

THIS 16th day of June, 2009.



Robert Bartley Turner
Georgia Bar No. 006440
Attorney for the Plaintiff

SAVAGE, TURNER, PINSON & KARSMAN
Post Office Box 10600
Savannah, Georgia 31412
(912) 231-1140

IN THE STATE COURT OF CHATHAM COUNTY
STATE OF GEORGIA

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Brian N. Shaw

COLLEEN GRIER as Next Friend of)
KAITLYN GRIER, a Minor,)
)
Plaintiffs,)
)
vs.)
)
STEPHANIE BRITT and)
CHEER SAVANNAH, INC.,)
)
Defendants.)

Civil Action No.

PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO DEFENDANTS

COMES NOW the Plaintiff in the above-styled case, and requires the Defendants, pursuant to O.C.G.A. § 9-11-34, to produce for inspection and copying at the offices of the Plaintiff's attorney of record, Robert Bartley Turner, Savage, Turner, Pinson & Karsman, 304 East Bay Street, Savannah, Georgia 31401, the following documents within forty-five (45) days of the date of service of this request.

Plaintiff requests that, along with the production of documents, a written response be made detailing the documents produced and any documents covered by these requests which the Defendant objects to producing.

NOTE A: These requests are continuous and should be supplemented if additional information is received at a later date.

NOTE B: If documents requested are not in the Defendant's possession, please state as follows:

- (1) name of person who has possession or knowledge of whereabouts;

- (2) business address of such;
- (3) business telephone number of such.

NOTE C: If you claim that a privilege applies to any document sought by this request, then state the factual and legal basis for the claimed privilege and identify the document (by date, author, recipient, general subject matter) so that it can be described in a motion to compel.

NOTE D: The term “active file” when used in this document means any electronic data file that can be utilized by an electronic data processing system in any manner without modification and/or reconstruction. An active file is any electronic data file that has not been erased or otherwise destroyed or damaged and which is readily visible to the operating system or software with which it was created.

NOTE E: The term “archive” when used in this document, is intended to refer to all processes for copying and storage, whether temporary or permanent, the electronic data in a computer system, other than active files in on-line storage. “Archive” or “archiving” refers to any system for maintaining electronic data off-line, whether referred to as an archive, dump, purge, or by other terms, and also to any system for storage of electronic media which is not in current use on the system.

NOTE F: The term “computer” when used in this document shall include, but is not limited to, microcomputers (also known as personal computers or P.C.s), laptop computers, portable computers, notebook computers, palm top computers, personal digital assistant, minicomputers, and mainframe computers.

NOTE G: The term “data” when used in this document is equivalent to the term “electronic data” as defined herein.

NOTE H: The term “deleted file” when used in this document means any electronic file that has been erased or deleted from the electronic media on which it resided. A deleted file includes any whose file allocation table (FAT) entry has been modified to indicate the file as being deleted and/or which is not readily visible to the operating system and/or the software with which it was created.

NOTE I: The term “document” or “documentation” when used in this Request also includes all information, electronic data or documents, as defined in O.C.G.A. § 9-11-34, found on any of your computers, operating systems and utilities, application software and/or hardware devices, electronic data files containing written or on-line information provided by the seller or manufacturer of the item and/or by in-house sources, including all manuals, guides, instructions, programming notes, protocols, policies, procedures and other sources of information about technical specifications, installation, usage and functioning of the computer, operating systems and utilities, application software and/or hardware devices.

NOTE J: The term “electronic data” when used in this document means all information of all kinds maintained by electronic data processing systems including all non-identical copies of such information. Electronic data includes, but is not limited to, computer programs (whether private, commercial, or work in progress), programming notes or instructions, and input and/or output used or produced by any software program or utility (including electronic mail messages and all information referencing or relating to such messages anywhere on the computer system, word processing documents, and all information stored in connection with such documents, electronic outlines, arrays of information and all other information used or produced by any software, operating systems, passwords, source codes of all types, programming languages, linkers and compilers, peripheral drivers, PIP files, batch files, any and all ASCII

files, and any and all miscellaneous file and/or file fragments, regardless of the media on which they reside and regardless whether said electronic data is stored on computer memories, hard disk, floppy disk, CD Roms, Iomega zip or Jaz drivers and their equivalent, magnetic tape of all types, microfiche, punch cards or tapes, computer chips, including, but not limited to EPROM, PROM, RAM, and ROM, or on or in any other vehicle for digital data storage and/or transmittal. The term "electronic data" also includes the file, folder tags, and/or containers and labels appended to or associated with any physical storage device associated with the information described above.

1. A complete copy of any correspondence, reports, emails, memorandum of telephone conversations, or any other written communications or evidence of oral communications between Defendant Britt and the Plaintiffs.
2. A copy of any photographs, maps, plates, drawings, diagrams, videos, or other demonstrative evidence depicting any subject matter which is deemed relevant to any aspect of this case which is discoverable.
3. Any and all reports, summaries or correspondence of any kind or nature whatsoever from any expert consulted regarding the incident which is the subject of this suit, and any written summary of such expert's oral report of communication.
4. A copy of any insurance policy having coverage for the incident complained of in the Complaint.
5. Produce all emails which you have received or sent regarding Cheer Savannah, Inc.
6. Produce all emails which you have received or sent regarding Colleen Grier
7. Produce all emails which you have received or sent regarding Kaitlyn Grier
8. Please produce all documents that support any facts which support your defenses.

9. Please produce all photographs in your possession which depict Kaitlyn Grier, Colleen Grier or any of the Greir family.
10. Please produce copies of any and all documents in support of your responses to Plaintiff's First Interrogatories to Defendants.

THIS 16th day of June, 2009.



Robert Bartley Turner
Georgia Bar No. 006440

SAVAGE, TURNER, PINSON & KARSMAN
Post Office Box 10600
Savannah, Georgia 31412
(912) 231-1140

IN THE STATE COURT OF CHATHAM COUNTY
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Brian K. Shurt


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)
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Civil Action No.

CERTIFICATION UNDER RULE 3.2

Pursuant to Rule 3.2 and 3.4 of the Georgia Uniform Superior Court Rule, I hereby certify that this petition-pleading does not involve substantially the same parties or substantially the same subject matter or substantially the same factual issues which would require the petition-pleading to be specifically assigned to the Judge whom the original action was or is assigned.

THIS 16th day of June, 2009.


Robert Bartley Turner
Georgia Bar No. 006440
C. Dorian Britt
Georgia Bar No. 083259

SAVAGE, TURNER, PINSON & KARSMAN
304 East Bay Street
Savannah, Georgia 31412-10600
(912) 231-1140



General Civil Case Filing Information Form (Non-Domestic) gasccc-03

Court
[] Superior
[X] State

County CHATHAM

Date Filed
MM-DD-YYYY

Docket # STCV

Plaintiff(s)

GRIER, COLLEEN as next friend of
Last First Middle I. Suffix Prefix Maiden

KAITLYN GRIER
Last First Middle I. Suffix Prefix Maiden

Last First Middle I. Suffix Prefix Maiden

Last First Middle I. Suffix Prefix Maiden

Defendant(s)

BRITT, STEPHANIE and
Last First Middle I. Suffix Prefix Maiden

CHEER SAVANNAH, INC.
Last First Middle I. Suffix Prefix Maiden

Last First Middle I. Suffix Prefix Maiden

Last First Middle I. Suffix Prefix Maiden

No. of Plaintiffs 1

No. of Defendants 2

Plaintiff/Petitioner's Attorney [] Pro Se

BRITT, C. DORIAN
Last First Middle I. Suffix

Bar # 083259

Check Primary Type (Check only ONE)

- [] Contract/Account
[] Wills/Estate
[] Real Property
[] Dispossessory/Distress
[] Personal Property
[] Equity
[] Habeas Corpus
[] Appeals, Reviews
[] Post Judgment Garnishment, Attachment, or Other Relief
[] Non-Domestic Contempt
[] Tort (If tort, fill in right column)
[X] Other General Civil Specify slander, emotional

If Tort is Case Type:

(Check no more than TWO)

- [] Auto Accident
[] Premises Liability
[] Medical Malpractice
[] Other Professional Negligence
[] Product Liability
[] Other Specify

Are Punitive Damages Pleaded? [X] Yes [] No

distress, assault