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IN THE CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE

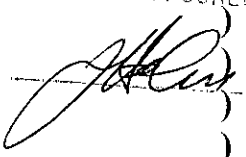
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JAMES L. HARRIS,

RICHARD R. FOCKER, CLERK

Plaintiff,

vs.



D.C.

No. 09C2031  
JURY DEMAND

ROBERT D. HUNT, MD; and  
THE CENTER FOR ATTENTION,  
INC.,

Defendants.

COMPLAINT

1. Plaintiff ("Harris") is an adult citizen and resident of Davidson County, Tennessee. Harris is an attorney at law, licensed to practice in Tennessee and elsewhere. For many years, Plaintiff has specialized in the representation of plaintiffs in workplace-related cases.
2. Defendant Robert D. Hunt ("Hunt") is a doctor of medicine, licensed to practice in Tennessee. Hunt can be served with process at his principal place of business, which is located at 2129 Belcourt Avenue, Nashville, Tennessee 37212.
3. Defendant The Center for Attention, Inc. ("the Center") is an inactive Tennessee corporation with its principal place of business located in Davidson County, Tennessee. The Center was administratively dissolved on August 21, 2006, by the Tennessee

Secretary of State. At all times pertinent, Hunt was an employee and/or agent of the Center, and as a consequence the Center is liable for Hunt's wrongful and tortuous acts and omissions by virtue of the doctrine of *respondeat superior*. The Center's resident agent for service of process is Robert D. Hunt, MD, 2129 Belcourt Avenue, Nashville, Tennessee 37212.

4. The wrongful and tortuous acts and omissions complained of herein occurred in Davidson County, Tennessee.
5. On October 10, 2008, Harris filed suit in the United States District Court for the Middle District of Tennessee, Nashville Division on behalf of a Plaintiff named Barry L. Osborne in the case of *Osborne v. Romark Laboratories, L.C.* That case is pending under Docket Number 3:08-cv-1000.
6. During the pendency of the *Osborne* case, in due course Harris advised adversary counsel as to the identities of the Rule 26 witnesses upon whom the Plaintiff reserved the right to rely. One of those witnesses was Hunt, a treating physician. Hunt's business is less than one-hundred miles from the United States District Court for the Middle District of Tennessee's Nashville Division place of hearing or

trial. Hunt was considered a witness as a treating physician of the Plaintiff and not an expert.

7. Adversary counsel in the *Osborne* case indicated a desire to depose Hunt, and Harris acceded to this request. One of the attorneys representing the Defendant deposed Hunt in June of 2009.
8. On or about June 13, 2009, Hunt defamed Harris both by spoken word and written word. After the deposition, Hunt told Mr. Osborne that Harris was “a complete waste” at the deposition; that Harris was “costing [Osborne] credibility, information, and status at every step,” that Harris was “completely inept” as an attorney; that Harris made various errors at the deposition; that Harris did not understand the issues; that Harris was inferior as an attorney to defense counsel; that Osborne was in the process of losing his case due to Harris’ ineptitude; and that it was “urgent” that Osborne discharge Harris as his attorney.
9. On that same date, Hunt e-mailed Osborne, and others, to these same effects, thus further publishing his defamatory remarks.
10. These defamatory statements were expressed by Hunt as being factual, rather than being expressed as Hunt’s opinions.

11. Hunt, who has no legal training, either knew or in the exercise of reasonable prudence and diligence should have known that his characterizations of Harris' skill as an attorney and of Harris' conduct at the deposition were false. These statements were made with reckless disregard for their truth and/or with negligence in failing to ascertain their truth. Even in the absence of any legal training or experience, Hunt would have learned even upon the most cursory inquiry not only that Harris' handling of the deposition was entirely appropriate under the circumstances but also that Harris enjoys an excellent reputation as a specialist within his area.
12. Hunt's defamatory statements as aforesaid had and have a tendency to injure Harris in his profession and as a consequence were and are actionable and defamatory *per se* both libel and slander.
13. Prior to the incidents which are the subject of this litigation, Harris and Hunt were unacquainted with one another. Hunt's defamatory statements were made with malice, and with an actual intent to injure.
14. Hunt's false and defamatory statements as aforesaid were unlawful statements intended to induce or persuade Mr. Osborne to

breach his employment contract with Harris within the meaning of TCA § 47-50-109.

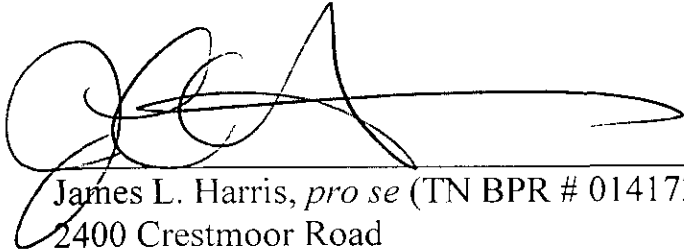
15. At all times pertinent, Hunt knew that Harris had an existing business relationship with Mr. Osborne. Hunt's false and defamatory statements were intentional statements expressly intended to cause Osborne to terminate Harris' services as Osborne's attorney. The statements were made with an improper motive and/or an improper means. As a consequence, Harris sues Defendants for the tort of intentional interference with a business relationship.

16. As a direct and proximate of Hunt's wrongful acts and omissions as aforesaid, Harris was been and will continue to be subjected to ridicule; he has suffered and will continue to suffer mental suffering and anguish; his reputation as an attorney has been and will continue to be damaged; his reputation and standing in the community has been and will continue to be damaged; and Harris has been and will continue to be otherwise damaged.

**WHEREFORE AND FOR ALL OF WHICH** Plaintiff sues Defendants, jointly and severally, for \$1,000,000.00 (one-million dollars) in compensatory damages and for punitive damages in a like amount, , and for

such other and general relief as he is deemed entitled, including but not limited to his reasonable discretionary expenses of litigation and the costs of the cause. Harris demands a jury to resolve the issues joined.

Respectfully submitted,

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke, positioned above a horizontal line.

James L. Harris, *pro se* (TN BPR # 014173)  
2400 Crestmoor Road  
Nashville, TN 37215  
615-386-7143  
Plaintiff