



IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA

MAURICE J. SCOTT, JR.)

PLAINTIFF,)

V.)

BLACK TITANIC, AKA, BT AKA HELEN)

CLARK AKA HELEN GRIFFIN, ET AL.)

DEFENDANTS.)

_____)

HELEN GRIFFIN (and all other)

Names used or referenced))

COUNTERCLAIM PLAINTIFF) (JURY TRIAL REQUESTED)

DEFENDANT)

V.) **Case Number CV2023-901536**

)

)

MAURICE J. SCOTT, JR (a Plaintiff and)

Counter Defendant) (and all other names)

Used or known by), in his individual,)

Representative, and agent capacities,)

And as cast member, representative,)

And agent of OWN's Love & Marriage:)

Huntsville, (jointly, individually)

and/or severally liable))

AND)

)

OPRAH WINFREY NETWORK,LLC,)
 Aka OWN, a Foreign entity, and all)
 other names used or known by)
 (a third party Defendant), and its agents)
 who cause the airing of “Love & Marriage:)
 Huntsville while casting Maurice J.)
 Scott, Jr. (jointly and/or severally liable),)
 AND)
 Fictitious Counter-Defendants, A,B,C,)
 and D Any and all fictious parties or)
 entities who are vicariously or otherwise)
 imputed with allowing, ratifying)
 an/or promoting the conduct of)
 Maurice Scott (jointly individually,and/or)
 severally liable), the names and)
 identities of fictious parties will be)
 named after further discovery,)
 PLAINTIFF)
 COUNTERCLAIM DEFENDANT)
 THIRD PARTY DEFENDANT)

ANSWER TO PLAINTIFF’S (MAURICE J. SCOTT, JR’S) AMENDED
 COMPLAINT,

AFFIRMATIVE DEFENSES,

COUNTERCLAIM AGAINST MAURICE J. SCOTT, JR

AND

CROSS CLAIM AGAINST OPRAH WINFREY NETWORK (OWN)

COMES NOW HELEN GRIFFIN (and by any other name used or referenced), by her attorney, Karen Humphrey, and respectfully submits:

ANSWER AND AFFIRMATIVE DEFENSES

1. Helen Griffin denies each and every material allegation and demands strict proof, and proof that Helen Griffin was properly served by Maurice J. Scott, Jr. (also referred to hereinafter as Maurice Scott or Mr. Scott), proof that claims of Maurice Scott against Helen Griffin are properly before this Court, proof that Maurice Scott has served Helen Griffin or any required Defenant within the required 120 days. The Counterclaim and third party claims of Helen Griffin shall survive any dismissal of claims made against Helen Griffin. **Helen Griffin does not waive any objections or defenses.** Oprah Winfrey Network is a party referenced by Maurice Scott in his Complaint (and as amended) now added hereto. Other liable, necessary fictitious parties will be added and named once those identities are known through discovery.

2. Other Affirmative Defenses
 - A. Lack of subject matter jurisdiction
 - B. Lack of jurisdiction over the person
 - C. Improper venue
 - D. Insufficient Process
 - E. Failure to state a claim
 - F. Failure to Join a party
 - G. Pleadings are due to be struck
 - H. All Rule 12 B objections
 - I. Lack of correct jurisdictional statement

- J. Punitive damages are statutorily barred
- K. Other damages are barred
- L. Claims are barred
- M. Collateral estoppel
- N. Res judicata
- O. Misrepresentation
- P. Failure to mitigate
- Q. Lack of conditions precedent
- R. Lack of strict proof
- S. All other affirmative defenses not named

3. Neither Helen Griffin nor her attorney waive timely service as required under Rule 4 of ARCP, and Helen Griffin has not been properly served by Plaintiff Maurice Scott his original or amended Complaint in this action.

COUNTER AND CROSS COMPLAINT AGAINST MAURUCE SCOTT AND
OPRAH WINFREY NETWORK
AND GENERAL ALLEGATION/ BACKGROUND

COMES NOW, Helen Griffin, through her attorney, Karen Humphrey, and further responds with a cross-complaint and third party- complaint both concerning with the same basic understanding of the same matter:

1. ALABAMA: Maurice Scott lives in Huntsville , Alabama and is an agent of and/or representative, or otherwise affiliated with Oprah Winfrey Network and/parties who are liable herein individually, jointly and/or severally. Helen Griffin is a resident of Georgia and viewer of an Oprah Winfrey Network aired show “ Love & Marriage: Huntsville.” Oprah Winfrey Network, LLC (Cross Plaintiff) also referred to hereinafter as Oprah Winfrey Network or OWN was formed in Delaware and its principal address and registered agent is located at 1041 N. Formosa Avenue, West Hollywood, California 90046 (also referred to as OWN or Oprah Winfrey Network hereinafter). Maurice Scott (Plaintiff and now Counter Defendant) has repeatedly named, represented, referred to, or is deemed

an agent or extension of Oprah Winfrey Network's reality show: "Love & Marriage: Huntsville," to the extent that Oprah Winfrey Network is hereby and properly added as an inseparable and liable party to this action, pursuant to Rule 19 and 20 or ARCP. The common contact and connection between these parties is Huntsville, Alabama, as the **Huntsville, Alabama** filmed reality show "Love & Marriage: Huntsville" is ultimately controlled and aired by the Oprah Winfrey Network. Huntsville celebrity and cast member, Maurice J. Sott, Jr., and the Madison County, Alabama Courthouse are located in Huntsville, Alabama where other alleged conduct has occurred concerning Helen Griffin.

2. Mr. Maurice Scott (also referred to hereinafter as Mr. Scott) calls himself a celebrity. Mr. Scott has submitted and filed a lawsuit on or about 12/22/23 in the above styled case representing himself and possibly the show in which he appears and he references therein: namely Love & Marriage: Huntsville.

3. Mr. Scott appears before television and/or internet viewers by way of the Oprah Winfrey Network (Aso called OWN). Accordingly, there is clearly a public interest in Mr. Scott and those that have placed him before a viewing audience for profit.

4. Based upon a reasonable understanding of the content of Mr. Scott's pro se or representative filings in which he calls "A Complaint" (and as amended)," Mr. Scott has made a showing that he is lacking in a basic understanding of the United States Constitution and lacking understanding that defamation is a cause of action where required elements **must be properly alleged**.

5. In *Smith v. Huntsville Times Co., Inc.*, 888 So.2d 492 (Ala. 2004), the courts determine what is false statement and what is malice:

This standard is satisfied by proof that a **false statement** was made "with **knowledge** that it was false or with **reckless disregard** of whether it was false or not." *Harte-Hanks Communications, Inc. v. Connaughton*, 491 U.S. 657, 659, 109 S.Ct. 2678, 105 L.Ed.2d 562 (1989) (quoting *New York Times v. Sullivan*, 376 U.S. at 279-80, 84 S.Ct. 710). A defendant acts with "**reckless disregard**" if, at the time of publication, the defendant "entertained serious doubts as to the truth of [its] publication" or acted "with a high degree of awareness of ... [its] **probable falsity**." *McFarlane*, 91 F.3d at 1508

(quoting *St. Amant*, 390 U.S. at 731, 88 S.Ct. 1323)(emphasis added). "The actual malice standard is subjective; the plaintiff **must prove that the defendant actually entertained a serious doubt.**" *Id.* (emphasis added). See *Sanders v. Smitherman*, 776 So.2d 68, 71 (Ala.2000); *Finebaum*, 854 So.2d at 1124; see also *Revell v. Hoffman*, 309 F.3d 1228, 1233 (10th Cir.2002); *Flowers v. Carville*, 310 F.3d 1118, 1131 (9th Cir.2002); *Chafoulias v. Peterson*, 668 N.W.2d 642, 654 (Minn.2003).

Malice can be shown by circumstantial evidence showing, for example, "that the story was (1) 'fabricated,' (2) '**so inherently improbable** that only a reckless man would have put [it] in circulation,' or (3) 'based wholly on' a **source that the defendant had 'obvious reasons to doubt,'** such as 'an unverified anonymous telephone call.'" *McFarlane*, 91 F.3d at 1512-13 (quoting *St. Amant*, 390 U.S. at 732, 88 S.Ct. 1323). **However, malice cannot be "measured by whether a reasonably prudent man would have published, or would have investigated before publishing."** *St. Amant*, 390 U.S. at 731, 88 S.Ct. 1323 (emphasis added). Indeed, **the failure to investigate does not constitute malice. . .**

6. Defamation is not an abstract word or a feeling. Defamation must be proven and is wholly defeated by truth, opinion, privilege, retraction or matters of public interest.

7. Mr. Scott who also calls himself a celebrity therefore appears as a public figure. For a public figure such as Mr. Scott, in order to recover, defamation must accompany actual, particularly described malice, none of which has been sufficiently alleged by Mr. Scott. Furthermore, Mr. Scott cites absolutely not even one Alabama or any other statute supporting his alleged causes of action.

8. Documents filed by Mr. Scott and those he may represent are of public interest. On 12/22/23, Maurice Scott filed a lawsuit in the Madison County Circuit Court in the above styled case (void of any cited Alabama Statute or the United States Constitution) against **three female African American viewers** of Oprah Winfrey Network's reality television show: "Love and Marriage: Huntsville" filmed in Huntsville, Alabama, namely Helen Griffin.

9. Mr. Scott promotes himself as a celebrity on and off said reality and constantly promotes watching the show and making sure everyone knows the that show ranks in the top fifty cable television shows for the Saturdays on which it airs.
10. The reality show Love & Marriage: Huntsville” is clearly a success with accolades to the creative genius behind the show.
11. There is nothing private however (and unfortunately) about the life of Maurice Scott who has voluntarily allowed the filming and intrusion into his own physical solitude or seclusion; giving publicity to private information about himself which is often seen as scandalous and lending to a made for television reality drama.
12. There are some in the viewing audience who may not know if Mr. Scott is a real or a fictional character, and are curious.
13. For a living, Mr. Scott has been observed playing a role on a television reality show with adult themes including criminal, sexual, and social controversies, heated arguments, including the handling of domestic violence, including cast members discussing their own actual pending Madison County, Alabama criminal charges actually pending, including dysfunctional relationships, and other controversial themes or subject matter.
14. Mr. Scott, on the show, has allowed himself (likely by some agreement) to be put in a false, but not always defamatory, positions in the public eye, while allowing the appropriation of some elements of the Mr. Scott’s personality for a commercial use.
15. The show, Love & Marriage: Huntsville, appears to be about observing and judging the real lives of selected African American couples, the good, bad and the positive, and appears highly successful.
16. This success of Love & Marriage: Huntsville apparently and undoubtedly comes from a devoted viewing audience, such as Helen Griffin, who are also free and protected by the United States Constitution.
17. The show appears to invoke laughter, tears, anger, curiosity, criticism, praise and is enjoyed by a large viewing audience.
18. Each cast member of said show undoubtedly has fans and those who dislike them for whatever the reason. Some who love the show, may not like some of the cast members, and vice versa.

19. The Oprah Winfrey Network is responsible for and in control of airing the show and bringing the show to the viewing audience on television and even on the internet. Ms. Griffin is in the viewing audience.
20. In Mr. Scott's own words, Mr. Scott is a celebrity.
21. At the same time, Mr. Scott has sold his privacy and autonomy for purposes of filming the details of his daily life and relationships while living in the city of Huntsville, Alabama in a manner designed to spark controversy and gossip.
22. Mr. Scott appears in control of very little, and appears to have been coached or empowered to create and file a lawsuit all about himself where he can be in control of his own narration and creativity.
23. Mr. Scott has shown an unreasonably high sense of his own importance, a need for extreme attention, and an unhealthy need for others to admire him.
24. Mr. Scott's apparent need to control and be admired has also lead to his fixation with three seemingly **confident female African American viewers** who are the antithesis of Mr. Scott, as shown in Mr. Scott's Complaint.
25. Mr. Scott's appearance on said reality show has lead him to his viewers, particularly to these three female African American women named in Mr. Scott's lawsuit.
26. Mr. Scott's has shown that his desire to censor and control these African American women viewers is a full attack at maximum speed on the constitutional right to free speech and freedom of assembly afforded by the by the First Amendment of our United States Constitution.
27. The rights Ms. Scott seeks to devour are those which protect **three female African American women** who are within their right to express opinions without fear of censorship.
28. Maurice Scott states in his lawsuit that he been an original cast member of said reality show since it premiered in January 2018. For clarity, this date falls outside of the two year statute of limitations for any actionable defamation in the State of Alabama.
29. This show, "Love and Marriage: Huntsville," actually follows the lives of individuals on the show, as Mr. Scott has confirmed.

30. Mr. Scott also states that the show has gained significant popularity and routinely ranks in the top fifty cable television shows for the Saturdays on which it airs, according to Mr. Scott.

31. Mr. Scott is clearly speaking on behalf of and in defense of the Love & Marriage: Huntsville reality show as he seeks the benefit of advertising during this lawsuit while attempting to silence and control the voices of viewers who are **African American women**.

32. Mr. Scott is unfortunately unable to grasp and accept that there are expressed personal opinions about him that often run afoul of the image he has of himself.

33. Mr. Scott is unable to grasp that expressed opinions made about him are for the purpose of entertainment only and not otherwise purposeful or intended to authenticate any fact.

34. Mr. Scott does not grasp that statements of opinion cannot be verifiably proven as true or false, and the law cannot simply intervene with balm for every wounded feeling.

35. Mr. Scott believes he is popular and popular based upon his appearance on “Love and Marriage: Huntsville,” and believes that if he is well known at all, he is well known primarily because of the role he plays on television.

36. Mr. Scott states and describes his own understanding that he plays a role on a “reality show” and appears to have an understanding that his day to day life and most private moments are filmed while viewers observe and watch him on said show every week.

37. Viewers see Mr. Scott as a reality show character and have no ability to know what is scripted, real or fiction, including the character names or nicknames portrayed in the show.

38. Viewers are entertained much like a soap opera by said show. Accordingly, that which is potentially or actually false, a false light, embarrassing, offensive, suggestive, or reckless are apparently materials publicly disseminated for (made for television) reality television controversy—also called entertainment. That which would highly offend a reasonable person, therefore, cannot be applied in the present case.

39. The reality show in which Mr. Scott appears is completely and seemingly engulfed in adult themes and scandals which likely increase viewership.

Accordingly, after each show, the internet is covered in entertainment gossip which keeps viewers watching said show, similar to a soap opera.

40. Accordingly, Mr. Scott's face and picture have been repeatedly scandalized and made the center of jokes, indecency, and immoral suggestions, permeated across the internet, as the character Mr. Scott plays on the reality show is designed to do (or at least as should be expected).

41. Mr. Scott not only profits from any gossip that keeps viewers tuned in, but should have known he would receive a variety treatment from playing a character on such a controversial reality show.

42. Mr. Scott should have known that his image is both fiction and real to some and that some would not believe he was an actual attorney off the show.

43. Mr. Scott, who calls himself a celebrity, should have known that some would question or become inquisitive about his name and background.

44. Mr. Scott should know that he cannot legally gag his viewing audience.

45. Said reality show, be it real or fiction, was apparently designed to spark emotions, to outrage, to humor, to incite gossip, debate, conversation, critique, and to entertain—an apparent formula for a very successful show with a large viewing audience.

46. Accordingly, Mr. Scott should not punish the viewing audience of the Opera Winfrey Network for doing exactly what he agreed to do.

47. Said viewers either love or hate certain characters on the show. Accordingly, Mr. Scott has enjoyed financial gain as a result of rumors, scandals and the real or fictitious adult themes on the reality television show.

48. Matters, however, appear to be taking a turn for the worse. More recently, Mr. Scott has been *unleashed* into and onto the viewing audience as Mr. Scott has become apparently fixated with the **hunting down and devouring African American women viewers, and three female African American viewers named in his lawsuit, including Helen Griffin.**

49. Mr. Scott has demonstrated an apparent instability and inability to separate reality from fiction. Accordingly, Mr. Scott has become obsessed with finding these three African American women and teaching them a lesson for not obeying his subservient style commands.

50. Unfortunately, Mr. Scott's behavior is no longer entertaining and has crossed the line as Mr. Scott seeks to enter and spill over into the private lives of **three female African American viewers**, as shown in Mr. Scott's Complaint.

51. There is a public interest in Mr. Scott's behavior when such behavior is supported by celebrity status and unbridled celebrity backed and connected **resources** to severely and potentially harm, traumatize and torment a hand picked group of **female African American viewers, namely Helen Griffin**.

52. Mr. Scott is apparently seeking a chilling effect to other female African American viewers as well—he calls them bloggers and content creators. Mr. Scott is actively chilling the free speech of viewers.

53. Mr. Scott has demonstrated a lack of temperament and ability to handle being in the public spotlight or on a reality show.

54. Mr. Scott has taken his frequently tarnished image he plays on a television reality show **very personally**.

55. Said reality show has unleashed Mr. Scott onto its viewers as he demonstrates what many would call extreme, aggressive, condescending, misogynistic, and litigious conduct---conduct that should be **addressed and monitored** by those who have placed him before the viewing audience.

56. Mr. Scott demonstrates a dangerous believe that his extreme conduct is justified against these **three African American women** named in his lawsuit, namely Helen Griffin.

57. Mr. Scott has more recently and apparently become out of control and he demonstrates a need for revenge and to make three **African American women viewers** undergo his definition of justice, punishment and subservience for exercising their Constitutional rights.

58. Mr. Scott conveniently omits actual citation to any statutes in his lawsuit because he has decided to **handle** these three African American women on his own and under his own terms.

59. Mr. Scott has essentially begun to keep his eye (See Mr. Scott's Amended Complaint exhibits containing facial expressions and the body language of himself) on three female African American viewers seeking to teach them a lesson.

60. Mr. Scott is likely (some believe) using this lawsuit as a new theme for his show, for advertisement, for profit, and a way to appear dominant and in control

over his television and internet audience who **either like or dislike him since his 2018 debut on Love & Marriage: Huntsville.**

61. Mr. Scott has weaponized his celebrity status and resources against the public and has frightened and offended his viewers, namely Helen Griffin.

62. Based upon Mr. Scott's court filings, Mr. Scott has become increasingly and apparently paranoid and very intimidated by his viewers, **particularly those who are African American women.**

63. Mr. Scott is distracted from the reality show and appears to have become fixated particularly on the **three African American women** he has selected from his viewing audience, namely Helen Griffin.

64. Mr. Scott is fixated on directly and/or indirectly **suppressing the voices** of African American women and particularly the three African American women viewers he has singled out for his lawsuit.

65. In Mr. Scott's Complaint, Mr. Scott uses the names of these three African American women as if they were slurs, something bad, something beneath him.

66. Mr. Scott has filed a lawsuit centered on himself, where his own exhibits capture his own body language and his own face blown up close and at center of attention—to apparently intimidate.

67. Mr. Scott has apparently filed a lawsuit centered upon his own self elevation and self esteem, while oppressing and villainizing **three African American women** for their voices and assembly. Ms. Scott thereby sends a message to these three African American woman that their freedom is *mistaken*.

68. Mr. Scott apparently believes that he is the internet police, where he and he alone may command authority over Youtube, Instagram and other platforms seeking to dominate, censor, and silence women, **particularly African American women.**

69. Mr. Scott is apparently no longer able to discern what is real from what is merely an opinion or for purpose of entertainment or journalism, and it is apparent to some, that Mr. Scott no longer has the temperament or discernment for a reality show because he is clearly on the attack against his own viewing audience.

70. Mr. Scott demonstrates by his conduct a dangerous notion that someone is out to get him. Mr. Scott has therefore become an apparent endangerment to his own viewing audience, and as result, Helen Griffin has every reason to be concerned by Mr. Scott's seemingly unhinged behavior, as observed by many.

71. Mr. Scott, a paid reality show cast member, ranks himself very high as a celebrity but speaks down to these three African American women viewers who Mr. Scott calls bloggers and content creators.

72. Mr. Scott ranks himself very high as a celebrity, while he degrades these **three African American women** accusing them of having **raced to the bottom** with a desire to garner viewership of their own, and to increase engagement and financial benefit from their respective audience as “content creators and bloggers.

73. Mr. Scott trivializes the creative talent of African American women while inflating himself.

74. Mr. Scott, on the other hand, has apparently sold his personal privacy in exchange for a spot on a television reality show, while suggesting that three female African American viewers have “raced to the bottom” for money allegedly earned on social media platforms. Mr. Scott suggests that these three female African American viewers are but mere bottom feeders juxtaposed to his celebrity status.

75. Mr. Scott is apparently using themes of misogyny to gain attention, to denigrate, to boost himself, to advertise, to harass, and to create drama and relevancy. Accordingly, the lawsuit Mr. Scott has filed in this case is a mere episode of his own creation.

76. Mr. Scott, alleges repeatedly that he is a cast member of “Love and Marriage: Huntsville,” and represents himself and others in this lawsuit. At the same time, Mr. Scott also attempts to defend “Love and Marriage” Huntsville,” and his own law practice.

77. As Mr. Scott has stated, all parts of Mr. Scott’s life have been put before a camera for the purpose of a reality show. With no disrespect intended, Mr. Scott’s entwined celebrity and legal career are therefore a blur. Mr. Scott’s role playing is a blur as Mr. Scott is a representative of “Love and Marriage: Huntsville,” a celebrity, a character, a hostile foe of African American women who view the show, an opponent to the voices and constitutional freedom of African American women, and a now a Plaintiff. At any given time, Mr. Scott may appear like a chameleon as any one or more of the above.

78. In Mr. Scott's Complaint, he mentions nothing about his name and reputation as a character on a reality television show—his profession since 2018.

79. Mr. Scott does not seem to understand that his public image is the actual character he plays on television, that people/viewers may not like the character and personality he plays on the television show and that they have every right to say so.

80. Mr. Scott has filed a lawsuit (Complaint) centered not around any legally defined defamatory statements, but instead about boosting his own image and esteem on the internet and on a television reality show. Accordingly, Mr. Scott's central and reoccurring request for relief in the lawsuit (Complaint) is a **public apology from three African American women, namely Helen Griffin.**

81. Mr. Scott apparently wants to see apologetic bowing and a public bending of the knee—an apparent conquering of some sort of three African American women.

82. Mr. Scott appears particularly vexed by what he believes are likes and shares received by the three African American viewers on line—as he is apparently haunted by their growing success and popularity.

83. Mr. Scott is apparently enraged by the popularity of the three African American women viewers on line and admits that he is attentive to internet postings about cast, participants, and family members of Love and Marriage: Huntsville.”

84. Furthermore, Mr. Scott is seemingly intimidated, as he suggests, by live streams on line including commentary about Mr. Scott's character on the show.

85. Mr. Scott, as he suggests, has inner trouble when bloggers are popularized as they post scandals about celebrities—**any and all celebrities.** Mr. Scott appears to be a spokesperson for Love and Marriage: Huntsville, but Mr. Scott has inner trouble with those that follow the lives, work, and relationships of individuals on or related to Love and Marriage: Huntsville.

86. Mr. Scott, who calls himself a celebrity, is fixated on capturing a **visual** of three African American women terrified by his threatening behavior, and then publicly submitting to him in a most humiliating and apologetic manner.

87. Mr. Scott, who calls himself a celebrity, is seemingly fixated on a visual image of himself bringing three African American women into his submission in an open public form.

88. Mr. Scott, who calls himself a celebrity, apparently desires more attention, and to resurrect himself as one holding power over the three African American viewers Mr. Scott seeks to terrorize with his baseless claims.

89. Mr. Scott does not state that he has reported any alleged defamatory comments to any service provider.

90. Mr. Scott, as he claims, apparently made or published an Instagram video of himself and attached and published the very comments he alleges were made against him, however, Mr. Scott does not state with clarity the dates of any such comments (as alleged) or if any such comments were ever retracted.

91. Mr. Scott is apparently unaware of the prerequisite in Alabama for recovery for vindictive or punitive damages for libel, as he has conceded in his Complaint that there was an **investigation by Helen Griffin**, but the investigation should have continued longer regarding the alleged defamatory statements.

92. In Mr. Scott's Complaint, he also **refers to Ms. Griffin as an investigative journalist but says nothing about the inherent privileges of such a title which defeat claims of defamation.**

93. **In Mr. Scott's Complaint**, there is no malice alleged or specifically described by Mr. Scott or Mr. Scott has himself negated that very element (malice) required for a defamation action by a celebrity or for punitive damages. See *Smith v. Huntsville Times Co., Inc.* cited above where failure to properly investigate is **not sufficient** to show or allege malice.

94. In addition to negating the element of recklessness, Mr. Scott does not allege in his Complaint that within five (5) days prior to the commencement of this lawsuit, that he made any **written demand** upon Ms. Griffin for any public retraction of the matter allegedly published, that Ms. Griffin has received such **written demand**, or that by Ms. Griffin's failed to properly publish a retraction after receiving such written demand, as prescribed under Alabama law.

95. In Alabama, if a retraction is published with 10 days of a publication, only actual damages may be recovered. A refusal to retract after receiving a **written demand** to do so, as prescribed under Alabama law, demonstrates malice.

96. Mr. Scott negates malice when he concedes that he has not served written notice for any retraction prior to filing this litigation, followed by a refusal.

97. Furthermore, **Mr. Scott negates his own claim by alleging or insinuating that a good faith effort was in fact made to investigate, but that the efforts were simply inadequate, according to Mr. Scott.... and he refers to Ms. Griffin as an investigative journalist.**

98. Mr. Scott is confused: Mr. Scott seems to be confuse hyperbolicism and hypotheticals with actual facts. Mr. Scott seems confuse gossip with statements or assertions of fact. Mr. Scott seems to confuse a healthy debate among a few individuals with actual asserted facts made in public. Mr. Scott seems to confuse opinion and assumptions with statements of fact.

99. Mr. Scott repeatedly alleges and concedes in his own Complaint that comments allegedly made about him were made using the word **“allegedly.”**

100. Mr. Scott has also acknowledged in his Complaint that that trolling also occurs on social media where someone may make comments pretending to be someone else, and Mr. Scott does not rule out common problems with counterfeit social media posts.

101. In Mr. Scott’s Complaint, Mr. Scott admits, explains and concedes that Maurice Scott is a common name, that those allegedly making comments against him did make an attempt to investigate, but in Mr. Scott’s opinion, those investigations were inadequate or grossly inadequate. Again, see *Smith v. Huntsville Times Co., Inc.*, where failure to properly investigate is **not sufficient** to show or allege malice. Malice is a required element against a public figure or celebrity.

102. Mr. Scott suggests and alleges that but for an inadequate investigation into the truth, the comments he alleges were **actually believed as possible**. That which is believed as possible is therefore not in serious doubt of the truth.

103. Accordingly, in *Smith v. Huntsville Times Co., Inc.*, 888 So.2d 492 (Ala. 2004), the courts determine what is a false statement.. . and what is malice: This standard is satisfied by proof that a **false statement** was made “with **knowledge** that it was false or with **reckless disregard** of whether it was false or not. ... A defendant acts with **“reckless disregard”** if, **at the time of publication, the defendant “entertained serious doubts as to the truth.**

104. Mr. Scott, who calls himself a celebrity, alleges negligence but has filed an action which requires actual malice against a public figure, and as for the alleged

false statement, Mr. Scott concedes that alleged information he calls defamatory was actually **believable and possible**.

105. Mr. Scott also negates his own complaint again by implying that the alleged comments were presented as hearsay made **subject** to further investigation.

106. Defamation Per Se cannot be alleged by mere innuendos. Mr. Scott therefore concedes by his own allegation that there is no malice in being merely inadequate, or engaged in hearsay. Mr. Scott has therefore foreclosed his own civil action.

107. Mr. Scott attempts to describe the alleged defamatory comments but is repeatedly unable to make or directly quote the comments, the origin, or the entire context of any alleged conversation.

108. Mr. Scott alleges that when someone spoke and used the pronoun “he” that they were speaking about him.

109. Mr. Scott alleges that if someone spoke the name, “Maurice,” they were speaking about him.

110. Much like the Streisand effect, Mr. Scott is claiming to be the “he” in every alleged conversation even when his name is not spoken.

111. Innuendos and insinuations are **not** false statements and will not support Slander or Libel Per Se. Such ambiguities, innuendos and insinuations are **not harmful on their face** and cannot support defamation per se and without defamation per se there cannot be any **presumptions** made that an alleged statement is harmful.

112. Mr. Scott’s entire Complaint (as amended) is based upon defamation per se.

113. Mr. Scott has therefore created his own public record and images where he is both claiming to be AND denying that he is the target of alleged criminal subject matter allegedly described by another.

114. However, Mr. Scott actually concedes within his own allegations that it was merely inferred (not asserted) that he had been engaged in criminal activity.

115. Mr. Scott does not allege that anyone has commented about **active** criminal activity but instead, that **someone** with a similar or the same name has criminal records, which even Mr. Scott admits is true.

116. Mr. Scott admits that Maurice Scott is a common name and does not deny there is a Maurice Scott with a criminal record.

117. Mr. Scott does not admit or deny that his character on the reality show has caused reasonable suspicion about his history and records.

118. The reality show has apparently filmed or covered its own characters who are actively fighting criminal charges.

119. Mr. Scott does not deny that criminal records are a valid public concern regarding any individual or celebrity.

120. Mr. Scott states that the comments he alleges were **sufficiently factual** to cause belief—negating both malice, negligence, knowingly and falsity elements.

121. Mr. Scott, who calls himself a celebrity, seeks damages, but does not allege any legal basis for damages as a public figure, and has alleged no actual damages, and has otherwise turned his own Amended Complaint against himself.

122. Mr. Scott appears very disconnected with the definition of libel and slander, and Mr. Scott cannot point to or isolate the damage he **has caused to himself** based on the character he plays on reality television, his voluntary waiver of privacy made in order to play a role on reality television, his own reposting or republishing the very material he alleges to be defamatory, his own history of complaints, his own bickering with bloggers or content creators, his own intrusion and trolling into private conversations, his own toggling back and forth from reality to fiction, or his own conduct.

123. Furthermore, Mr. Scott cannot isolate or distinguish which Defendant, Defendants, or fictitious parties have caused any specific damage, as he alleges.

124. The Streisand Effect is the self inflicted phenomenon which describes an attempt to suppress allegedly defamation statement by publishing the same statement alleged defamatory. Accordingly, Mr. Scott has posted, reposted, published, and has now filed the statements that he claims should not have been made available to the public. Mr. Scott can therefore only calculate and consider damages **inflicted upon himself**.

125. Mr. Scott alleges there has been a publication, but that Ms. Griffin has had only 412 subscribers on Youtube as of December 14, 2023 and 395 total views until she began covering information related to Love & Marriage: Huntsville. Mr. Scott has not alleged how 412 subscribers or any such small group of private followers (compared to the public as a whole) amounts to a publication to **the public**.

126. Mr. Scott does not allege exactly where and exactly on what date any such posts can be found (published and republished) which he alleges to form a basis of his lawsuit.

127. Mr. Scott does not state the exact origin of any such posts or from what platform each of the posts originated, or how such posts have been authenticated.

128. Mr. Scott also alleged that Ms. Griffin's comments were in response to others, but names no such individuals or the full context of any such alleged conversations.

129. Mr. Scott does not allege that any posts or comments in question still exist or the number of times Mr. Scott has published, shared, or republish them himself or made them available to the public—the Streisand Effect.

130. Mr. Scott does not allege that he has served any detailed **written letter** to Ms. Griffin describing in detail the alleged defamatory comment(s), and then demanding a retraction for any alleged defamatory comment(s), as prescribed under Alabama law.

131. In Alabama, if there is a belief that a defamatory statement has occurred, the first remedy available is a **written demand** for retraction. Mr. Scott, a reality show actor, chose drama instead.

132. Mr. Scott had no photo or video shots attached to his original Complaint filed on 12/22/23. Instead, Mr. Scott has made an irrelevant video of himself (a photo opportunity) and filed the video image as an exhibit to his amended Complaint (lawsuit) filed two months later on 2/26/24.

133. Mr. Scott's other exhibits concerning alleged defamatory statements are blurred or non-legible in each exhibit. The only completely legible exhibit item is Mr. Scott's billboard like photo exhibit of his own face.

134. Mr. Scott has apparently made a self gratifying, undated, unauthenticated video of himself allegedly giving warning to the **three female African American viewers** named in this lawsuit. **The video serves no legal purpose.**

135. Mr. Scott's ransom style video depicts his himself as if an emperor, blown up, and looking close into a camera with aggressive body language and facial expression.

136. Mr. Scott's self made video was crafted to appear as if Mr. Scott is looking with his **eyes focused** directly upon three female African American viewers named in his lawsuit.

137. Said video appears scripted, made for television, made for gossip, self soothing, self serving, rehearsed, theatric, calculated, threatening, and revengeful. Mr. Scott's video however serves no **legal purpose other than to harass, threaten, and intimidate.**

138. Things once again take a turn for the worse. Mr. Scott's video of himself is unsettling, and a signal that Mr. Scott, who calls himself a celebrity, could potentially use unlimited resources to bring about harm, seek his own justice, or impose great inconvenience to the three female African American viewers which have become his unhealthy obsession.

139. Mr. Scott's baseless demand for a public apology suggests that Mr. Scott has intended and still intends to force the three African American viewers to speak and make a public apology, to say the words that he wants to hear and in the tone and manner in which he wants to hear them.

140. Mr. Scott has cited absolutely no legal entitlement for forcing three female African American viewers to hang their heads down in public and speak words that Mr. Scott needs to hear in order to lift his scorn and to release these three African American women from **his mind.**

141. Mr. Scott implies that the apology is a ticket to their freedom.

142. Mr. Scott, who calls himself a celebrity from the Oprah Winfrey Network show, Love & Marriage: Huntsville, is particularly fixated with one of the three female African American viewers by the name of Helen Griffin.

143. In Mr. Scott's Complaint, Mr. Scott seemingly scoffs at Ms. Griffin as Mr. Scott minimizes what he calls her promotions of literary work, her work as an African American author and educator, the donations she receives, her likes and shares on social media, her audience on social media, and **he refers to her an investigative journalist.**

144. Mr. Scott seems hungry for celebrity recognition, intimidated by the popularity of his own television viewers, and is particularly grieved by the voices of three female confident African American viewers he names and describes in his lawsuit.

145. Mr. Scott although a self acclaimed celebrity himself, seeks to bind, minimize, gag, humiliate, and to silence these three female African American women, and is very intimidated by **their success** and popularity. Mr. Scott seems to treat them as pests or confined to a vision of servitude and poverty---never successful.

146. Mr. Scott seeks to gag and reprimand these three female African American viewers to sooth his own apparent, deep, inner conflict with women's rights, freedom of speech among African American women, African American women in journalism, and their worth.

147. Mr. Scott has an apparent disturbing visual image of and fixation with each of these three African American women performing a public apology at his command.

148. Mr. Scott's fixation with these three female African American viewers is disturbing. Mr. Scott's fixation with himself is disturbing. Mr. Scott's video (attached to his amended Complaint) of himself is disturbing.

149. Mr. Scott is seen in a video essentially threatening to take their money if he does not receive a pubic apology and making threats that a fool and his money are soon departed.

150. Mr. Scott's apparently obsession with making three African America women viewers complacent to his commands is troubling.

151. Mr. Scott's apparent fixation and vanity with himself being both popular and a celebrity has **reached a point of public concern.**

152. Mr. Scott's conduct is frightening to his viewers, especially to Helen Griffin, and **for good reason.**

153. Accordingly, Mr. Scott has taken his wrath to a new level by filing a lawsuit. Mr. Scott has filed a lawsuit against three African American women.

154. Before serving the lawsuit upon Ms. Griffin and the other Defendants, Mr. Scott filed in the Madison County Courthouse, in this case, Notices of Intent to service Subpoena Duces Tecum were filed to obtain data from several of the largest holders of personal data in the world: PayPal, Inc., Meta Platforms, Inc., and Google,LLC. Mr. Scott aggressively sought the data concerning Helen Griffin and the other Africam American women named.

155. Without question, a download of unscreened data from these moguls is the equivalence of a complete confiscation and capture of person's identity their very existence. It is hard to fathom **how** Mr. Scott would acquire this power and control over another.

156. For purposes of describing **fraud with particularity** as required by law in a civil action, Mr. Scott has methodically and apparently committed fraudulent and/or deceptive acts designed to unlawfully take personal and private data and

information from the three female African American viewers named in this lawsuit without their knowledge, consent, or objection—namely Helen Griffin. This is also better known and defined in courts as an **identity theft** for which civil causes of action and remedies also apply as shown herein.

157. Mr. Scott also claims use of his attorney credentials (with access to Alacourt) in addition to a reality television celebrity status. Apparently, these roles are blended or overlapping at times.

158. These acts as an attorney credentialled, reality show cast member (Mr. Scott) were nevertheless methodically carried out as Mr. Scott filed certificates of service authenticating verifying (under Rule 11 of Alabama Rules of Civil Procedure) that Helen Griffin and her attorney on record (neither of which have appeared or been made parties) had been served notice of the Notice of Intent to serve the Subpoenas. **The only way the subpoenas could legally be issued was to first give notice to all parties in the lawsuit.** Mr. Scott filed his lawsuit on 12/22/23 and proceeded with apparently falsifying notices for the subpoenas as early as 12/28/23 with full knowledge that none of the Defendants, including Helen Griffin, had been served to even be in his lawsuit.

159. Repeated subpoenas followed for months while Mr. Griffin had not yet been served any lawsuit, had not appeared on the record, and no attorney appearing on this case on Ms. Griffin's behalf. Mr. Scott knew that Helen Griffin was unrepresented and had not been served with any lawsuit, or with any notice of intent to serve any subpoena.

160. Mr. Scott apparently made sure that Helen Griffin was named in the original complaint, but **without any listed address** (address unknown) so that there would be no possibility whatsoever that Helen Griffin would be served or put on legal notice this lawsuit **before** Mr. Scott could confiscate her private information from the large, global, data collecting giants, namely PayPal, Inc., Meta Platforms, Inc., and Google,LLC.

161. Things have again turned for the worse. Mr. Scott used apparent deceptive methods described herein to seek and/or obtain Ms. Griffin's personal identifier information, her PayPal data, her name, address, and date of birth, phone number, email addresses and all bank account and other described information.

162. It is well known that Google and other data is often stored which tracks an individual's every movement and location including everything sent, received,

every browsing history, all metadata, every photo, every online purchase or payment, and every interaction, and key stroke entered on a private computer. It has been said that Google knows more about us than our mothers. This is a dangerous tool in the wrong hands.

163. Ms. Scott is also aware that within such data are likely to be privileged information to and from Helen Griffin's attorneys, doctors, regarding minor children, and other data statutorily protected against disclosure. **Privileged correspondence with the undersigned attorney is very likely within such information.**

164. Mr. Scott does not represent Ms. Griffin and has no right or standing to waive those statutory privileges on her behalf or by deception **to the court.** Mr. Scott's actions, as a celebrity, reality show cast member of Love & Marriage: Huntsville, are therefore reprehensible and **clearly actionable.**

164. Mr. Scott has filed notices and has served subpoenas without serving notice to Helen Griffin that Mr. Scott has commenced a civil action against her and before Ms. Griffin could answer the civil action or otherwise appear in this civil action.

165. Mr. Scott acting with attorney credentials should know of Rule 45 of the Alabama Rules of Civil Procedure (ARCP) and the notice requirement under Rule 45 of ARCP which is printed on the back of every Alabama civil subpoena (Form C-13). Rule 45 is printed conspicuously on the back of or on the second page of every such subpoena which states in no uncertain words that all parties in the lawsuit have the right to be present for the production and inspection of the requested documents or information set forth in the subpoena pursuant to Rule 45(c)(2)(B) of ARCP.

166. The second page of said subpoena form defines "**servicing**" as **mailing** a copy to the party of the attorney and **that if any objection is made, the party serving the subpoena may not be entitled to inspect and copy the requested materials except pursuant to the order of the court** by which the subpoena was issued. . . Under timely motion by a party, the Court may quash the subpoena if the subpoena requires disclosure of privileged or other protected matter. See Rule 45 Sections (c) and (d). . . Rule 45 allows a party to make a claim of privilege or protection requiring the receiving party to promptly return, sequester, or destroy the specified information and any copies made and may be required to take steps to retrieve all information so disclosed to others.

167. Furthermore, Rule 45 (a)(3)(A) demands that Notice of Intent to Serve Subpoena for Production or Inspection (with the proposed subpoena attached) shall be served on **every other party** allowing 15 days for any objection **before** said subpoena is issued.

168. The safety net built into Rule 45 is the strict mandate that such notice may be served freely without leave of court **ONLY** after 45 days after service of the summons and complaint (the lawsuit) upon any such defendant. Following said 45 days, should any Notice of Intent to Serve Subpoena be filed, the Clerk shall issue a subpoena **only** if there are no objections after 15 days from the time the Defendant party has notice of the Intent to Serve the Subpoena.

169. Apparently, **what Mr. Scott needed most was time**. Mr. Scott knew that Helen Griffin would not know that Mr. Scott had submitted a certificate of service falsely stating that he had served her and her non existing attorney with a Notice of Intent to Serve Subpoena.

170. Furthermore, Mr. Scott knew that he had prepared a Complaint Summons at the commencement of this lawsuit stating that the **address of Helen Griffin was unknown** and the court record reflected the same.

171. Mr. Scott knew that there was no attorney of record for Ms. Griffin. Mr. Scott then caused the issuance of another Complaint Summons stating that Helen Griffin lived at an address in Madison, Alabama. Mr. Scott's Complaint also states falsely that Helen Griffin is a resident of the State of Alabama.

172. Mr. Scott spent many additional days attempting to serve Ms. Griffin at the Madison, Alabama address but the **return** revealed that Ms. Griffin did not live at the Madison address.

173. Meanwhile, Mr. Scott was apparently and methodically seeking to obtain Ms. Griffin's **most private and privileged data**, bank account information, and identity data **no person would want stolen, obtained unlawfully, or without notice**.

174. Not only did Mr. Scott apparently file certificates of service stating falsely that he had served Ms. Griffin and her attorney, Mr. Scott entered dates and times on each subpoena to suggest that there is either a scheduled court date or deposition or some other date associated with **no** lawful activity or court proceeding. Mr. Scott continued to unlawfully cause issuance of subpoenas through about March 11, 2024.

175. **Apparently, what Mr. Scott needed most was time.** On 2/26/24, Mr. Scott filed an Amended Complaint.

176. Notably, Mr. Scott's original Complaint had no exhibits, but his Amended Complaint contained a large still photo of Mr. Scott looking in close range to a camera directed towards the three named female African American viewers, including Ms. Griffin.

177. The video appears to be ransom like in nature in **that by 2/26/24 Mr. Scott was likely holding some, all, or potentially a large compilation of their most personal, privileged, and private data which would be more than enough completely steal their identities, cause a lifetime of grief and worry, and/or cause extreme chaos in the lives of the three female African American viewers, namely Helen Griffin. Mr. Scott's photo reasonably suggested that he demanded an apology in lieu of using damaging data he had likely collected without proper authorization.**

178. Mr. Scott added to his Amended Complaint, for no legal purpose, his own photo showing his anger, body language, and his eyes that seemed to be fixed upon his intended three recipients, namely Helen Griffin.

179. While potentially holding personal, privileged, and the most and sensitive private information clearly, boldly, and likely held at Mr. Scott free disposal, disbursement, and use, **Mr. Scott posts his video picture of himself warning three African American women that he DEMANDS their public apology—**an apparent **ultimatum** given new meaning when the private data of these three women could now be used to completely stalk, spy, terrorize, and embarrass, harass, or steal their identities at Mr. Scott's command or permission.

180. This type of damage is almost immeasurable and similar to the loss of life. Ms. Helen Griffin stands punished, publicly humiliated, damaged and violated by Mr. Scott, who is not a judge or an emperor.

181. Mr. Scott has no plausible immunity for his actions carried out to take Ms. Griffin's information through improper and deceptive methods described herein.

182. Any legal privilege ever existing for Mr. Scott has been waived.

183. Legal privilege does not extend to actions or communications made or received for a dishonest purpose, to assist a person in committing an offense.

184. **After** Mr. Scott caused subpoenas to issue based upon his own untruths certified in a court record, Mr. Scott **traced and tracked Ms. Griffin** to the State of Georgia, and then published her address into this lawsuit and to the public.

185. Mr. Scott's actions were unwise. Mr. Scott's violation of Ms. Griffin's right to her confidentiality concerning attorney-client privilege, doctor-patient privilege, information concerning minor, information concerning any medical records or disability, and any other information **completely irrelevant** to a defamation case, **does not** come with any litigation privilege or protection or protection from a **private cause of action** based upon such unauthorized confiscation of **statutorily protected information**.

186. **Circumventing** the requirements of Rule 45 of ARCP to obtain and subpoena and to confiscate information by deception are **not acts covered by litigation privilege**. Such acts are **not associated with any litigation process**.

187. No attorney or individual has litigation privilege when it is clearly foreseeable of the harm caused by such conduct.

188. No such acts are accepted standards of legal practice.

189. The litigation privilege will not cover acts with no **legitimate** goal or purpose.

190. Acts committed **maliciously** are not covered by litigation privilege. To commit any such acts effectively waives any existing litigation privilege.

191. Ms. Griffin has never waived any of her privileges and Mr. Scott has no standing to waive them for her and then receive any litigation immunity from his actions.

192. Litigation privilege is therefore, and for good reason, **not** always outweighed by competing interest, as it does not override any statutory right to confidentiality.

193. Mr. Scott, for example, will never be immune from confiscating information protected by **attorney-client privilege**. Rule 502(d) of Ala. R. Evid. protects the attorney-client privilege and there is no lawful and legitimate civil proceeding that tramples that privilege.

194. In addition, there is no litigation existing which allows for such conduct or would make such conduct **relevant** to any litigation proceeding.

195. Litigation privileges are defeated when they are abused or when a party has acted maliciously. Accordingly, Litigation privilege will never be honored for a party that has made use of the legal process in an improper manner or to accomplish a purpose for which the privilege/protection was not designed. . . . or where a party has attempted to **deprive** another party of statutory rights that are the foundation of civil litigation.

196. Mr. Scott, therefore, has no claim to litigation privilege based upon his conduct described herein and above.

COUNT ONE

(AGAINST MAURICE J. SCOTT, JR. AND

OPRAH WINFREY NETWORK)

(individually, jointly, and severally liable)

INVASION OF PRIVACY

197. Plaintiff adopts by reference paragraphs One (1) through One Hundred Ninety Six (196) above and fully adopts and incorporates them herein.

198. Based upon conduct by Maurice J. Scott, Jr. (Maurice Scott) and the adoption, ratification, control over Maurice Scott, the airway provided by Oprah Winfrey Network, LLC (OWN) bringing content to its viewing audience, Helen Griffin has been subjected to conduct that is (1) intruding into the her physical solitude or seclusion; (2) giving publicity to private information about the her that violates ordinary decency; (3) putting her in a false, but not necessarily defamatory, position in the public eye; or (4) appropriating some element of her personality for a commercial use."...

199. As a direct and proximate cause of conduct described herein of Maurice Scott and/ or Oprah Winfrey Network, Helen Griffin has been damages and therefore seeks compensative, monetary, emotional, actual, punitive and all other damages allowed by law which include medical bills, loss of income, travel, inconvenience, attorney fees, costs, all relevant losses, all relevant damages, and amount no less than **\$5,000.000.00** and/or any similar or higher amount determined by a jury, and in addition to awards payable due to other counts herein.

COUNT TWO

(AGAINST MAURICE J. SCOTT, JR. AND

OPRAH WINFREY NETWORK)

(individually, jointly, and severally liable)

Invasion of Privacy consistent with a violation of the Computer Fraud and Abuse Act under 18 U.S.C Section 1030.

200. Plaintiff adopts by reference paragraphs One (1) through One Hundred Ninety Six (196) above and fully adopts and incorporates them herein.

201. Based upon conduct by Maurice J. Scott, Jr. (Maurice Scott) and the adoption, ratification, control over Maurice Scott, the airway provided by Oprah Winfrey Network, LLC (OWN) bringing content to its viewing audience, Helen Griffin has been subjected to conduct supporting a civil action which includes but is not limited to that which prohibits intrusion or trespasses into computer data with lack of proper authorization or by exceeding authorized access, which includes data storage facilities or communications facilities and described computers including computers that manage website data, and includes access to protected passwords, and includes implied threats to hold or handle such data in exchange for something.

202. As a direct and proximate cause of conduct described herein of Maurice Scott and/ or Oprah Winfrey Network, Helen Griffin has been damaged and therefore seeks compensative, emotional, monetary, actual, punitive and all other damages allowed by law which include medical bills, loss of income, travel, inconvenience, attorney fees, costs, all relevant losses, all relevant damages, and amount no less than **\$5,000.000.00** and/or any similar or higher amount determined by a jury, and in addition to awards payable due to other counts herein.

COUNT THREE

(AGAINST MAURICE J. SCOTT, JR. AND

OPRAH WINFREY NETWORK)

(individually, jointly, and severally liable)

Invasion of Privacy consistent with violating 18 U.S. Code Section 2701 Unlawful
Access to Stored Communications

203. Plaintiff adopts by reference paragraphs One (1) through One Hundred Ninety Six (196) above and fully adopts and incorporates them herein.

204. Based upon conduct by Maurice J. Scott, Jr. (Maurice Scott) and the adoption, ratification, control over Maurice Scott, the airway provided by Oprah Winfrey Network, LLC (OWN) bringing content to its viewing audience, Helen Griffin has been subjected to conduct supporting a civil action which forbids intentionally accessing electronically stored information.

205. As a direct and proximate cause of conduct described herein of Maurice Scott and/ or Oprah Winfrey Network, Helen Griffin has been damages and therefore seeks compensative, emotional, monetary, actual, punitive and all other damages allowed by law which include medical bills, loss of income, travel, inconvenience, attorney fees, costs, all relevant losses, all relevant damages,, and amount no less than **\$5,000.000.00** and/or any similar or higher amount determined by a jury, and in addition to awards payable due to other counts herein.

COUNT FOUR

(AGAINST MAURICE J. SCOTT, JR. AND

OPRAH WINFREY NETWORK)

(individually, jointly, and severally liable)

Invasion of Privacy through Cyber stalking

206. Plaintiff adopts by reference paragraphs One (1) through One Hundred Ninety Six (196) above and fully adopts and incorporates them herein.

207. Based upon conduct by Maurice J. Scott, Jr. (Maurice Scott) and the adoption, ratification, control over Maurice Scott, the airway provided by Oprah Winfrey Network, LLC (OWN) bringing content to its viewing audience, Helen Griffin has been subjected to conduct supporting a civil action against Cyberstalking with involves the use of technology to make an individual fearful or concerned about his or her safety. Cyberstalkers generally employ the Internet through e-mails, blogs,

instant messages, video messages, chat rooms, social networks, or other websites, which intimidate, harass, and create fear in victims. Cyberstalking is harassing in nature and may include revealing private information; sending threatening messages through text messages or social media; calling or messaging repeatedly and constantly; posting derogatory posts on social media; and sending unwanted and inappropriate photographs or videos.

208. As a direct and proximate cause of conduct described herein of Maurice Scott and/ or Oprah Winfrey Network, Helen Griffin has been damages and therefore seeks compensative, monetary, emotional, actual, punitive and all other damages allowed by law which include medical bills, loss of income, travel, inconvenience, attorney fees, all relevant loss, all relevant damages, and amount no less than **\$5,000.000.00** and/or any similar or higher amount determined by a jury, and in addition to awards payable due to other counts herein.

COUNT FIVE

(AGAINST MAURICE J. SCOTT, JR. AND

OPRAH WINFREY NETWORK)

(individually, jointly, and severally liable)

Intentional Infliction of Emotion Distress through Cyberstalking

209. Plaintiff adopts by reference paragraphs One (1) through One Hundred Ninety Six (196) above and fully adopts and incorporates them herein.

210. Based upon conduct by Maurice J. Scott, Jr. (Maurice Scott) and the adoption, ratification, control over Maurice Scott, the airway provided by Oprah Winfrey Network, LLC (OWN) bringing content to its viewing audience, Helen Griffin has been subjected to conduct supporting a civil action against Cyberstalking with involves the use of technology to make an individual fearful or concerned about his or her safety. Cyberstalkers generally employ the Internet through e-mails, blogs, instant messages, video messages, chat rooms, social networks, or other websites, which intimidate, harass, and create fear in victims. Cyberstalking is harassing in nature and may include revealing private information; sending threatening messages through text messages or social media; calling or messaging repeatedly and constantly; posting derogatory posts on social media; and sending unwanted and inappropriate photographs or videos.

211. As a direct and proximate cause of conduct described herein of Maurice Scott and/ or Oprah Winfrey Network, Helen Griffin has been damages and therefore seeks compensative, monetary, emotional, actual, punitive and all other damages allowed by law which include medical bills, loss of income, travel, inconvenience, attorney fees, all relevant loss, all relevant damages, and amount no less than **\$5,000.000.00** and/or any similar or higher amount determined by a jury, and in addition to awards payable due to other counts herein.

COUNT SIX

(AGAINST MAURICE J. SCOTT, JR. AND
OPRAH WINFREY NETWORK)
(individually, jointly, and severally liable)

Intentional Infliction of Emotional Distress consistent with violation of the Computer Fraud and Abuse Act under 18 U.S.C Section 1030.

212. Plaintiff adopts by reference paragraphs One (1) through One Hundred Ninety Six (196) above and fully adopts and incorporates them herein.

213. Based upon conduct by Maurice J. Scott, Jr. (Maurice Scott) and the adoption, ratification, control over Maurice Scott, the airway provided by Oprah Winfrey Network, LLC (OWN) bringing content to its viewing audience, Helen Griffin has been subjected to conduct supporting a civil action which includes but is not limited to that which prohibits intrusion or trespasses into computer data with lack of proper authorization or by exceeding authorized access, which includes data storage facilities or communications facilities and described computers including computers that manage website data, and includes access to protected passwords, and includes implied threats to hold or handle such data in exchange for something.

214. As a direct and proximate cause of conduct described herein of Maurice Scott and/ or Oprah Winfrey Network, Helen Griffin has been damaged and therefore seeks compensative, monetary, emotional, actual, punitive and all other damages allowed by law which include medical bills, loss of income, travel, inconvenience, attorney fees, all relevant loss, all relevant damages, and amount no less than

\$5,000.000.00 and/or any similar or higher amount determined by a jury, and in addition to awards payable due to other counts herein.

COUNT SEVEN

(AGAINST MAURICE J. SCOTT, JR. AND

OPRAH WINFREY NETWORK)

(individually, jointly, and severally liable)

Intentional Infliction of Emotional Distress

215. Plaintiff adopts by reference paragraphs One (1) through One Hundred Ninety Six (196) above and fully adopts and incorporates them herein.

216. Based upon conduct by Maurice J. Scott, Jr. (Maurice Scott) and the adoption, ratification, control over Maurice Scott, the airway provided by Oprah Winfrey Network, LLC (OWN) bringing content to its viewing audience, Helen Griffin has been subjected to conduct supporting a civil action which includes but is not limited to that which prohibits intrusion or trespasses into computer data with lack of proper authorization or by exceeding authorized access, which includes data storage facilities or communications facilities and described computers including computers that manage website data, and includes access to protected passwords, and includes implied threats to hold or handle such data in exchange for something.

217. As a direct and proximate cause of conduct described herein of Maurice Scott and/ or Oprah Winfrey Network, Helen Griffin has been damaged and therefore seeks compensative, monetary, emotional, actual, punitive and all other damages allowed by law which include medical bills, loss of income, travel, inconvenience, attorney fees, all relevant loss, all relevant damages, and amount no less than **\$5,000.000.00** and/or any similar or higher amount determined by a jury, and in addition to awards payable due to other counts herein.

COUNT EIGHT

(AGAINST MAURICE J. SCOTT, JR. AND

OPRAH WINFREY NETWORK)

(individually, jointly, and severally liable)

Tort of Outrage

218. Plaintiff adopts by reference paragraphs One (1) through One Hundred Ninety Six (196) above and fully adopts and incorporates them herein.

219. Based upon conduct by Maurice J. Scott, Jr. (Maurice Scott) and the adoption, ratification, control over Maurice Scott, the airway provided by Oprah Winfrey Network, LLC (OWN) bringing content to its viewing audience, Helen Griffin has been subjected to conduct supporting a civil action providing that (1) [T]hat the actor intended to inflict emotional distress or that he knew or should have known that emotional distress was the likely result of his conduct ...; (2) that the conduct was 'extreme and outrageous,' ...; (3) that the actions of the defendant were the cause of the plaintiff's distress, ...; and (4) that the emotional distress sustained by the plaintiff was 'severe'...."...

220. As a direct and proximate cause of conduct described herein of Maurice Scott and/ or Oprah Winfrey Network, Helen Griffin has been damaged and therefore seeks compensative, monetary, emotional, actual, punitive and all other damages allowed by law which include medical bills, loss of income, travel, inconvenience, attorney fees, all relevant loss, all relevant damages, and amount no less than **\$5,000.000.00** and/or any similar or higher amount determined by a jury, and in addition to awards payable due to other counts herein.

COUNT NINE

(AGAINST MAURICE J. SCOTT, JR. AND

OPRAH WINFREY NETWORK)

(individually, jointly, and severally liable)

Negligence Per Se

221. Plaintiff adopts by reference paragraphs One (1) through One Hundred Ninety Six (196) above and fully adopts and incorporates them herein.

222. Based upon conduct by Maurice J. Scott, Jr. (Maurice Scott) and the adoption, ratification, control over Maurice Scott, the airway provided by Oprah Winfrey Network, LLC (OWN) bringing content to its viewing audience, Helen Griffin has been subjected to conduct supporting a civil action of negligence per se: (1) that the statute was enacted to protect a class of persons that includes the litigant seeking to assert the statute; (2) that the injury was of the type contemplated by the statute; (3) that the party charged with negligent conduct violated the statute; and (4) that the statutory violation proximately caused the injury.

223. As a direct and proximate cause of conduct described herein of Maurice Scott and/ or Oprah Winfrey Network, Helen Griffin has been damaged and therefore seeks compensative, monetary, emotional, actual, punitive and all other damages allowed by law which include medical bills, loss of income, travel, inconvenience, attorney fees, all relevant loss, all relevant damages, and amount no less than **\$5,000.000.00** and/or any similar or higher amount determined by a jury, and in addition to awards payable due to other counts herein.

COUNT TEN

(AGAINST MAURICE J. SCOTT, JR. AND

OPRAH WINFREY NETWORK)

(individually, jointly, and severally liable)

Conversion

224. Plaintiff adopts by reference paragraphs One (1) through One Hundred Ninety Six (196) above and fully adopts and incorporates them herein.

225. Based upon conduct by Maurice J. Scott, Jr. (Maurice Scott) and the adoption, ratification, control over Maurice Scott, the airway provided by Oprah Winfrey Network, LLC (OWN) bringing content to its viewing audience, Helen Griffin has been subjected to conduct supporting a civil where plaintiff can prove conversion by showing that "the defendant destroyed or exercised dominion over property to which, at the time of the [defendant's] destruction or exercise of dominion, the plaintiff had a general or specific title and of which the plaintiff was in actual possession or to which the plaintiff was entitled to immediate possession...

226. As a direct and proximate cause of conduct described herein of Maurice Scott and/ or Oprah Winfrey Network, Helen Griffin has been damaged and therefore seeks compensative, monetary, emotional, actual, punitive and all other damages allowed by law which include medical bills, loss of income, travel, inconvenience, attorney fees, all relevant loss, all relevant damages, and amount no less than **\$5,000.000.00** and/or any similar or higher amount determined by a jury, and in addition to awards payable due to other counts herein.

COUNT ELEVEN

(AGAINST MAURICE J. SCOTT, JR. AND

OPRAH WINFREY NETWORK)

(individually, jointly, and severally liable)

Fraud/Deception/Misrepresentation

227. Plaintiff adopts by reference paragraphs One (1) through One Hundred Ninety Six (196) above and fully adopts and incorporates them herein.

228. Based upon conduct by Maurice J. Scott, Jr. (Maurice Scott) and the adoption, ratification, control over Maurice Scott, the airway provided by Oprah Winfrey Network, LLC (OWN) bringing content to its viewing audience, Helen Griffin has been subjected to conduct supporting a civil action: Code 1975, §§ 6-5-101 and -103, and the awarding of punitive damages under these Code sections for reckless misrepresentations. The relevant portions of §§ 6-5-101 and -103 are: § 6-5-101, "Misrepresentations of a material fact made ... recklessly without knowledge ... constitute legal fraud," and § 6-5-103, "In all cases of deceit, knowledge of a falsehood constitutes an essential element. A ... reckless representation of facts as

true, which the party may not know to be false, if intended to deceive, is equivalent to a knowledge of the falsehood."...

229. As a direct and proximate cause of conduct described herein of Maurice Scott and/ or Oprah Winfrey Network, Helen Griffin has been damaged and therefore seeks compensative, monetary, emotional, actual, punitive and all other damages allowed by law which include medical bills, loss of income, travel, inconvenience, attorney fees, all relevant loss, all relevant damages, and amount no less than **\$5,000.000.00** and/or any similar or higher amount determined by a jury, and in addition to awards payable due to other counts herein.

COUNT TWELVE

(AGAINST MAURICE J. SCOTT, JR. AND

OPRAH WINFREY NETWORK)

(individually, jointly, and severally liable)

"§ 6-5-101. Fraud - Misrepresentations of material facts

230. Plaintiff adopts by reference paragraphs One (1) through One Hundred Ninety Six (196) above and fully adopts and incorporates them herein.

231. Based upon conduct by Maurice J. Scott, Jr. (Maurice Scott) and the adoption, ratification, control over Maurice Scott, the airway provided by Oprah Winfrey Network, LLC (OWN) bringing content to its viewing audience, Helen Griffin has been subjected to conduct supporting a civil action: Misrepresentations of a material fact made willfully to deceive, or recklessly without knowledge, and acted on by the opposite party, or if made by mistake and innocently and acted on by the opposite party, constitute legal fraud." Ala. Code 6-5-101 Fraud - Misrepresentations of material facts

232. As a direct and proximate cause of conduct described herein of Maurice Scott and/ or Oprah Winfrey Network, Helen Griffin has been damaged and therefore seeks compensative, monetary, emotional, actual, punitive and all other damages allowed by law which include medical bills, loss of income, travel, inconvenience, attorney fees, all relevant loss, all relevant damages, and amount no

less than **\$5,000.000.00** and/or any similar or higher amount determined by a jury, and in addition to awards payable due to other counts herein.

COUNT THIRTEEN

(AGAINST MAURICE J. SCOTT, JR. AND
OPRAH WINFREY NETWORK)

(individually, jointly, and severally liable)

"§ 6-5-102. Suppression of material facts

233. Plaintiff adopts by reference paragraphs One (1) through One Hundred Ninety Six (196) above and fully adopts and incorporates them herein.

234. Based upon conduct by Maurice J. Scott, Jr. (Maurice Scott) and the adoption, ratification, control over Maurice Scott, the airway provided by Oprah Winfrey Network, LLC (OWN) bringing content to its viewing audience, Helen Griffin has been subjected to conduct supporting a civil action: Suppression of a material fact which the party is under an obligation to communicate constitutes fraud. The obligation to communicate may arise from the confidential relations of the parties or from the particular circumstances of the case." Ala. Code 6-5-102 Suppression of material facts (Code Of Alabama (2024 Edition))

235. As a direct and proximate cause of conduct described herein of Maurice Scott and/ or Oprah Winfrey Network, Helen Griffin has been damaged and therefore seeks compensative, monetary, emotional, actual, punitive and all other damages allowed by law which include medical bills, loss of income, travel, inconvenience, attorney fees, all relevant loss, all relevant damages, and amount no less than **\$5,000.000.00** and/or any similar or higher amount determined by a jury, and in addition to awards payable due to other counts herein.

COUNT FOURTEEN

(AGAINST MAURICE J. SCOTT, JR. AND

OPRAH WINFREY NETWORK)

(individually, jointly, and severally liable)

§ 6-5-103. Deceit

236. Plaintiff adopts by reference paragraphs One (1) through One Hundred Ninety Six (196) above and fully adopts and incorporates them herein.

237. Based upon conduct by Maurice J. Scott, Jr. (Maurice Scott) and the adoption, ratification, control over Maurice Scott, the airway provided by Oprah Winfrey Network, LLC (OWN) bringing content to its viewing audience, Helen Griffin has been subjected to conduct supporting a civil action: **Willful misrepresentation of a material fact made to induce another to act, and upon which he does act to his injury, will give a right of action. Mere concealment of such a fact, unless done in such a manner as to deceive and mislead, will not support an action. In all cases of deceit, knowledge of a falsehood constitutes an essential element. A fraudulent or reckless representation of facts as true, which the party may not know to be false, if intended to deceive, is equivalent to a knowledge of the falsehood.**

238. As a direct and proximate cause of conduct described herein of Maurice Scott and/ or Oprah Winfrey Network, Helen Griffin has been damaged and therefore seeks compensative, monetary, emotional, actual, punitive and all other damages allowed by law which include medical bills, loss of income, travel, inconvenience, attorney fees, all relevant loss, all relevant damages, and amount no less than **\$5,000.000.00** and/or any similar or higher amount determined by a jury, and in addition to awards payable due to other counts herein.

"....

COUNT FIFTEEN

(AGAINST MAURICE J. SCOTT, JR. AND

OPRAH WINFREY NETWORK)

(individually, jointly, and severally liable)

§ 6-5-104. Deceit - Fraudulent deceit

239. Plaintiff adopts by reference paragraphs One (1) through One Hundred Ninety Six (196) above and fully adopts and incorporates them herein.

240. Based upon conduct by Maurice J. Scott, Jr. (Maurice Scott) and the adoption, ratification, control over Maurice Scott, the airway provided by Oprah Winfrey Network, LLC (OWN) bringing content to its viewing audience, Helen Griffin has been subjected to conduct supporting a civil action: **(a) One who willfully deceives another with intent to induce him to alter his position to his injury or risk is liable for any damage which he thereby suffers.(b) A deceit within the meaning of this section is either:(1) The suggestion as a fact of that which is not true by one who does not believe it to be true;(2) The assertion as a fact of that which is not true by one who has no reasonable ground for believing it to be true;(3) The suppression of a fact by one who is bound to disclose it or who gives information of other facts which are likely to mislead for want of communication of that fact; or (4) A promise made without any intention of performing it. Ala. Code 6-5-104 Deceit - Fraudulent deceit (Code Of Alabama (2024 Edition))**

241. As a direct and proximate cause of conduct described herein of Maurice Scott and/ or Oprah Winfrey Network, Helen Griffin has been damaged and therefore seeks compensative, monetary, emotional, actual, punitive and all other damages allowed by law which include medical bills, loss of income, travel, inconvenience, attorney fees, all relevant loss, all relevant damages, and amount no less than **\$5,000.000.00** and/or any similar or higher amount determined by a jury, and in addition to awards payable due to other counts herein.

COUNT SIXTEEN

(AGAINST MAURICE J. SCOTT, JR. AND

OPRAH WINFREY NETWORK)

(individually, jointly, and severally liable)

NEGLIGENT SUPERVISION/HIRING

242. Plaintiff adopts by reference paragraphs One (1) through One Hundred Ninety Six (196) above and fully adopts and incorporates them herein.

243. Based upon conduct by Maurice J. Scott, Jr. (Maurice Scott) and the adoption, ratification, control over Maurice Scott, the airway provided by Oprah Winfrey Network, LLC (OWN) bringing content to its viewing audience, Helen Griffin has been subjected to conduct supporting a civil action: That the employer knew, or in the exercise of ordinary care should have known, that its employee/agent was incompetent...."In the master and servant relationship, the master is held responsible for his servant's incompetency when notice or knowledge, either actual or presumed, of such unfitness has been brought to him. Liability depends upon its being established by affirmative proof that such incompetency was actually known by the master or that, had he exercised due and proper diligence, he would have learned that which would charge him in the law with such knowledge.

244. As a direct and proximate cause of conduct described herein of Maurice Scott and/ or Oprah Winfrey Network, Helen Griffin has been damaged and therefore seeks compensative, monetary, emotional, actual, punitive and all other damages allowed by law which include medical bills, loss of income, travel, inconvenience, attorney fees, all relevant loss, all relevant damages, and amount no less than **\$5,000.000.00** and/or any similar or higher amount determined by a jury, and in addition to awards payable due to other counts herein.

COUNT SEVENTEEN

(AGAINST MAURICE J. SCOTT, JR. AND
OPRAH WINFREY NETWORK)
(individually, jointly, and severally liable)

WANTONNESS

245 Plaintiff adopts by reference paragraphs One (1) through One Hundred Ninety Six (196) above and fully adopts and incorporates them herein.

246. Based upon conduct by Maurice J. Scott, Jr. (Maurice Scott) and the adoption, ratification, control over Maurice Scott, the airway provided by Oprah Winfrey Network, LLC (OWN) bringing content to its viewing audience, Helen Griffin has been subjected to conduct supporting a civil action: "[1] the conscious doing of some act or the conscious omission of some duty [2] with knowledge of the existing conditions and [3] while conscious that from the doing of that act or by the omission of that duty injury will likely or probably result.

247. As a direct and proximate cause of conduct described herein of Maurice Scott and/ or Oprah Winfrey Network, Helen Griffin has been damaged and therefore seeks compensative, monetary, emotional, actual, punitive and all other damages allowed by law which include medical bills, loss of income, travel, inconvenience, attorney fees, all relevant loss, all relevant damages, and amount no less than **\$5,000.000.00** and/or any similar or higher amount determined by a jury, and in addition to awards payable due to other counts herein.

COUNT EIGHTEEN

(AGAINST MAURICE J. SCOTT, JR. AND
OPRAH WINFREY NETWORK)

(individually, jointly, and severally liable)

Violation of Stored Communication Act, 18 U.S.C Chapter 121 et al.

248. Plaintiff adopts by reference paragraphs One (1) through One Hundred Ninety Six (196) above and fully adopts and incorporates them herein.

249. Based upon conduct by Maurice J. Scott, Jr. (Maurice Scott) and the adoption, ratification, control over Maurice Scott, the airway provided by Oprah Winfrey Network, LLC (OWN) bringing content to its viewing audience, Helen Griffin has been subjected to conduct supporting a civil action: Interference through fraud or any manipulation of a legal process that interferes with compelled disclosure of store wire and electronic communications and transactional records held by a third party. The Fourth Amendment to the U.S. Constitution protect a person's right to be secure in the persons, houses, paper, and effects against unreasonable searches and seizures.

250. As a direct and proximate cause of conduct described herein of Maurice Scott and/ or Oprah Winfrey Network, Helen Griffin has been damaged and therefore seeks compensative, monetary, emotional, actual, punitive and all other damages allowed by law which include medical bills, loss of income, travel, inconvenience, attorney fees, all relevant loss, all relevant damages, and amount no less than **\$5,000.000.00** and/or any similar or higher amount determined by a jury, and in addition to awards payable due to other counts herein.

COUNT NINETEEN

(AGAINST MAURICE J. SCOTT, JR. AND

OPRAH WINFREY NETWORK)

(individually, jointly, and severally liable)

**Violation of the First and Fourteenth Amendment of the United States
Constitution**

251. Plaintiff adopts by reference paragraphs One (1) through One Hundred Ninety Six (196) above and fully adopts and incorporates them herein.

252. Based upon conduct by Maurice J. Scott, Jr. (Maurice Scott) and the adoption, ratification, control over Maurice Scott, the airway provided by Oprah Winfrey Network, LLC (OWN) bringing content to its viewing audience, Helen Griffin has been subjected to conduct supporting a civil action: Violation of Freedom of speech and assembly.

253. As a direct and proximate cause of conduct described herein of Maurice Scott and/ or Oprah Winfrey Network, Helen Griffin has been damaged and therefore seeks compensative, monetary, emotional, actual, punitive and all other damages allowed by law which include medical bills, loss of income, travel, inconvenience, attorney fees, all relevant loss, all relevant damages, and amount no less than **\$5,000.000.00** and/or any similar or higher amount determined by a jury, and in addition to awards payable due to other counts herein.

COUNT TWENTY

(AGAINST MAURICE J. SCOTT, JR. AND

OPRAH WINFREY NETWORK)

(individually, jointly, and severally liable)

Violation of Section One of the Alabama Constitution

254. Plaintiff adopts by reference paragraphs One (1) through One Hundred Ninety Six (196) above and fully adopts and incorporates them herein.

255. Based upon conduct by Maurice J. Scott, Jr. (Maurice Scott) and the adoption, ratification, control over Maurice Scott, the airway provided by Oprah Winfrey Network, LLC (OWN) bringing content to its viewing audience, Helen Griffin has been subjected to conduct supporting a civil action for protection: **SECTION 1. Equality and rights of men.** That all men are equally free and independent; that they are endowed by their Creator with certain inalienable rights; that among these are life, liberty and the pursuit of happiness.

256. As a direct and proximate cause of conduct described herein of Maurice Scott and/ or Oprah Winfrey Network, Helen Griffin has been damaged and therefore

seeks compensative, monetary, emotional, actual, punitive and all other damages allowed by law which include medical bills, loss of income, travel, inconvenience, attorney fees, all relevant loss, all relevant damages, and amount no less than **\$5,000.000.00** and/or any similar or higher amount determined by a jury, and in addition to awards payable due to other counts herein.

COUNT TWENTY-ONE

(AGAINST MAURICE J. SCOTT, JR. AND

OPRAH WINFREY NETWORK)

(individually, jointly, and severally liable)

Injunctive Relief under Rule 65 of ARCP

RESTRAINING ORDER

257. Plaintiff adopts by reference paragraphs One (1) through One Hundred Ninety Six (196) above and fully adopts and incorporates them herein.

258. Based upon conduct by Maurice J. Scott, Jr. (Maurice Scott) and the adoption, ratification, control over Maurice Scott, the airway provided by Oprah Winfrey Network, LLC (OWN) bringing content to its viewing audience, Helen Griffin has been subjected to conduct supporting a civil action described in detail herein. Ms. Griffin seek injunctive relief and/or temporary or permanent restraining order which with stop Maurice Scott and/or OWN from violating Ms. Griffin's First Amendment activity and to enjoin civil harassment. d) Form and scope of injunction or restraining order. (1) Every order granting a restraining order shall describe in reasonable detail, and not by reference to the complaint or other document, the act or acts sought to be restrained; and is binding only upon the parties to the action, their officers, agents, servants, employees, and attorneys, and upon those persons in active concert or participation with them who receive actual notice of the order by personal service or otherwise.. . .

259. As a direct and proximate cause of conduct described herein of Maurice Scott and/ or Oprah Winfrey Network, Helen Griffin seeks injunctive relief which includes a restraining to protect immediately protect Helen Griffin from imminent irreparable harm against her, her family, associates, her personal affairs, her private, confidential, and privileged affairs, her property, her freedom, and rights

to be free from infringement, threat harassment and any other unlawful, wrongful, unconstitutional or actionable conduct, especially in light of her claims supporting that she has been damaged and also seeks compensative, monetary, emotional, actual, punitive and all other damages allowed by law which include medical bills, loss of income, travel, inconvenience, attorney fees, all relevant loss, attorney fees, costs, all relevant damages, and an amount no less than **\$5,000.000.00** for each count, and/or any similar or higher amount determined by a jury, and in addition to awards payable due to other counts herein.

PRAYER FOR RELIEF

WHEREFORE As included in each count above Helen Griffin has been damaged and otherwise damaged, and therefore seeks compensative, monetary, emotional, actual, punitive and all other damages allowed by law which include medical bills, loss of income, travel, inconvenience, attorney fees, all relevant loss, all relevant damages, attorney fees, costs, and amount no less than **\$5,000.000.00** for each count, and/or any similar or higher amount determined by a jury, and in addition to awards payable due to other counts herein.

/s/ Karen Humphrey

Attorney for Helen Griffin

101 Northside Square

Huntsville, AL 35801

256-536-0004 office

256-533-4116 fax

Humphrey155@bellsouth.net

CERTIFICATE OF SERVICE

I, Karen Humphrey, certify that on this the 3rd day of May, 2024 a copy of the above Complaint electronically by Alacourt upon Maurice J. Scott, Jr. and by prepaid first class US mail to Syreeta L.McNeal, 35610 Buttonwood Drive, Ste 200, Columbia, MO 65201.

/s/ Karen Humphrey

Attorney for Helen Griffin

101 Northside Square

Huntsville, AL 35801

256-536-0004 office

256-533-4116 fax

Humphrey155@bellsouth.net

ATTN CLERK: SUMMONS AND COMPLAINT shall be issued and served by the Clerk by certified mail to and upon Oprah Winfrey Network, LLC to its registered agent as follows:

Oprah Winfrey Network, LLC

Registered Agent: 1505 Corporation, CT Corporate System

1041 N. Formosa Avenue

West Hollywood, CA 90046