

STATE OF NORTH CAROLINA

File No.

18CVS 6516

FORSYTH

County FILED

In The General Court Of Justice
District Superior Court Division

Name And Address Of Plaintiff 1

STEVEN HEWETT
C/O SNYDER LAW
210 W. FRIENDLY AVE. STE 204
GREENSBORO

2018 DEC 20 P 3: 58

FORSYTH 27401, C.S.C.

GENERAL

CIVIL ACTION COVER SHEET

INITIAL FILING SUBSEQUENT FILING

Rule 5(b), General Rules of Practice For Superior and District Courts

Name And Address Of Plaintiff 2

BY LO

Name And Address Of Attorney Or Party, If Not Represented (complete for initial appearance or change of address)

BARRY SNYDER
210 W. FRIENDLY AVE. STE 204
GREENSBORO, NC 27401

VERSUS

Name Of Defendant 1

CLIFTON J. KILBY, JR.

Telephone No.

3365743303

Cellular Telephone No.

3364567860

NC Attorney Bar No.

52406

Attorney E-Mail Address

GABRIEL@SNYDERLAW.ORG

Summons Submitted

Yes No

Initial Appearance in Case

Change of Address

Name Of Defendant 2

Name Of Firm

SNYDER LAW

FAX No.

3365742324

Summons Submitted

Yes No

Counsel for

All Plaintiffs All Defendants Only (list party(ies) represented)

Jury Demanded In Pleading

Complex Litigation

Amount in controversy does not exceed \$15,000

Stipulate to arbitration

TYPE OF PLEADING

(check all that apply)

- Amend (AMND)
Amended Answer/Reply (AMND-Response)
Amended Complaint (AMND)
Assess Costs (COST)
Answer/Reply (ANSW-Response) (see Note)
Change Venue (CHVN)
Complaint (COMP)
Confession Of Judgment (CNJF)
Consent Order (CONS)
Consolidate (CNSL)
Contempt (CNTP)
Continue (CNTN)
Compel (CMPL)
Counterclaim (CTCL) Assess Court Costs
Crossclaim (list on back) (CRSS) Assess Court Costs
Dismiss (DISM) Assess Court Costs
Exempt/Waive Mediation (EXMD)
Extend Statute Of Limitations, Rule 9 (ESOL)
Extend Time For Complaint (EXCO)
Failure To Join Necessary Party (FJNP)

(check all that apply)

- Failure To State A Claim (FASC)
Implementation Of Wage Withholding In Non-IV-D Cases (OTHR)
Improper Venue/Division (IMVN)
Including Attorney's Fees (ATTY)
Intervene (INTR)
Interplead (OTHR)
Lack Of Jurisdiction (Person) (LJPN)
Lack Of Jurisdiction (Subject Matter) (LJSM)
Modification Of Child Support In IV-D Actions (MSUP)
Notice Of Dismissal With Or Without Prejudice (VOLD)
Petition To Sue As Indigent (OTHR)
Rule 12 Motion In Lieu Of Answer (MDLA)
Sanctions (SANC)
Set Aside (OTHR)
Show Cause (SHOW)
Transfer (TRFR)
Third Party Complaint (list Third Party Defendants on back) (TPCL)
Vacate/Modify Judgment (VCMD)
Withdraw As Counsel (WDCN)
Other (specify and list each separately)

NOTE: All filings in civil actions shall include as the first page of the filing a cover sheet summarizing the critical elements of the filing in a format prescribed by the Administrative Office of the Courts, and the Clerk of Superior Court shall require a party to refile a filing which does not include the required cover sheet.

CLAIMS FOR RELIEF

- | | | |
|--|--|---|
| <input type="checkbox"/> Administrative Appeal (ADMA) | <input type="checkbox"/> Limited Driving Privilege - Out-Of-State Convictions (PLDP) | <input type="checkbox"/> Product Liability (PROD) |
| <input type="checkbox"/> Appointment Of Receiver (APRC) | <input type="checkbox"/> Medical Malpractice (MDML) | <input type="checkbox"/> Real Property (RLPR) |
| <input type="checkbox"/> Attachment/Garnishment (ATTC) | <input type="checkbox"/> Minor Settlement (MSTL) | <input type="checkbox"/> Specific Performance (SPPR) |
| <input type="checkbox"/> Claim And Delivery (CLMD) | <input type="checkbox"/> Money Owed (MNYO) | <input checked="" type="checkbox"/> Other (<i>specify and list each separately</i>) |
| <input type="checkbox"/> Collection On Account (ACCT) | <input type="checkbox"/> Negligence - Motor Vehicle (MVNG) | ABUSE OF PROCESS |
| <input type="checkbox"/> Condemnation (CNDM) | <input type="checkbox"/> Negligence - Other (NEGO) | MALICIOUS PROSECUTION |
| <input type="checkbox"/> Contract (CNTR) | <input type="checkbox"/> Motor Vehicle Lien G.S. 44A (MVLN) | |
| <input type="checkbox"/> Discovery Scheduling Order (DSCH) | <input type="checkbox"/> Possession Of Personal Property (POPP) | |
| <input type="checkbox"/> Injunction (INJU) | | |

Date	Signature Of Attorney/Party
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FEES IN G.S. 7A-308 APPLY

Assert Right Of Access (ARAS)
 Substitution Of Trustee (Judicial Foreclosure) (RSOT)
 Supplemental Procedures (SUPR)

PRO HAC VICE FEES APPLY

Motion For Out-Of-State Attorney To Appear In NC Courts In A Civil Or Criminal Matter (Out-Of-State Attorney/Pro Hac Vice Fee)

No.	<input type="checkbox"/> Additional Plaintiff(s)		Summons Submitted
			<input type="checkbox"/> Yes <input type="checkbox"/> No
			<input type="checkbox"/> Yes <input type="checkbox"/> No
			<input type="checkbox"/> Yes <input type="checkbox"/> No
			<input type="checkbox"/> Yes <input type="checkbox"/> No
			<input type="checkbox"/> Yes <input type="checkbox"/> No

Plaintiff(s) Against Whom Counterclaim Asserted

Defendant(s) Against Whom Crossclaim Asserted

STATE OF NORTH CAROLINA

File No.

18CVS 65-16

FORSYTH County

In The General Court Of Justice
District Superior Court Division

Name Of Plaintiff
STEVEN HEWETT

Address
C/O SNYDER LAW 210 W. FRIENDLY AVE. STE 204

City, State, Zip
GREENSBORO, NC 27401

CIVIL SUMMONS

ALIAS AND PLURIES SUMMONS (ASSESS FEE)

G.S. 1A-1, Rules 3 and 4

VERSUS

Name Of Defendant(s)
CLIFTON J. KILBY, JR.

Date Original Summons Issued

Date(s) Subsequent Summons(es) Issued

To Each Of The Defendant(s) Named Below:

Name And Address Of Defendant 1
CLIFTON J. KILBY, JR.
3183 MOUNTAIN BROOK TRAIL
WINSTON-SALEM, NC 27105

Name And Address Of Defendant 2



IMPORTANT! You have been sued! These papers are legal documents, DO NOT throw these papers out! You have to respond within 30 days. You may want to talk with a lawyer about your case as soon as possible, and, if needed, speak with someone who reads English and can translate these papers!
¡IMPORTANTE! ¡Se ha entablado un proceso civil en su contra! Estos papeles son documentos legales. ¡NO TIRE estos papeles!
Tiene que contestar a más tardar en 30 días. ¡Puede querer consultar con un abogado lo antes posible acerca de su caso y, de ser necesario, hablar con alguien que lea inglés y que pueda traducir estos documentos!

A Civil Action Has Been Commenced Against You!

You are notified to appear and answer the complaint of the plaintiff as follows:

- 1. Serve a copy of your written answer to the complaint upon the plaintiff or plaintiff's attorney within thirty (30) days after you have been served. You may serve your answer by delivering a copy to the plaintiff or by mailing it to the plaintiff's last known address, and
2. File the original of the written answer with the Clerk of Superior Court of the county named above.

If you fail to answer the complaint, the plaintiff will apply to the Court for the relief demanded in the complaint.

Name And Address Of Plaintiff's Attorney (if none, Address Of Plaintiff)
BARRY SNYDER
210 W. FRIENDLY AVE. STE. 204
GREENSBORO, NC 27401

Date Issued 12-20-10 Time 3:51 AM PM

Signature [Handwritten Signature]
Deputy CSC Assistant CSC Clerk Of Superior Court

ENDORSEMENT (ASSESS FEE)
This Summons was originally issued on the date indicated above and returned not served. At the request of the plaintiff, the time within which this Summons must be served is extended sixty (60) days.

Date Of Endorsement Time AM PM

Signature
Deputy CSC Assistant CSC Clerk Of Superior Court

NOTE TO PARTIES: Many counties have MANDATORY ARBITRATION programs in which most cases where the amount in controversy is \$25,000 or less are heard by an arbitrator before a trial. The parties will be notified if this case is assigned for mandatory arbitration, and, if so, what procedure is to be followed.

(Over)

RETURN OF SERVICE

I certify that this Summons and a copy of the complaint were received and served as follows:

DEFENDANT 1

<i>Date Served</i>	<i>Time Served</i> <input type="checkbox"/> AM <input type="checkbox"/> PM	<i>Name Of Defendant</i>
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- By delivering to the defendant named above a copy of the summons and complaint.
- By leaving a copy of the summons and complaint at the dwelling house or usual place of abode of the defendant named above with a person of suitable age and discretion then residing therein.
- As the defendant is a corporation, service was effected by delivering a copy of the summons and complaint to the person named below.

Name And Address Of Person With Whom Copies Left (if corporation, give title of person copies left with)

Other manner of service (specify)

Defendant WAS NOT served for the following reason:

DEFENDANT 2

<i>Date Served</i>	<i>Time Served</i> <input type="checkbox"/> AM <input type="checkbox"/> PM	<i>Name Of Defendant</i>
--------------------	---	--------------------------

- By delivering to the defendant named above a copy of the summons and complaint.
- By leaving a copy of the summons and complaint at the dwelling house or usual place of abode of the defendant named above with a person of suitable age and discretion then residing therein.
- As the defendant is a corporation, service was effected by delivering a copy of the summons and complaint to the person named below.

Name And Address Of Person With Whom Copies Left (if corporation, give title of person copies left with)

Other manner of service (specify)

Defendant WAS NOT served for the following reason:

Service Fee Paid
\$

Signature Of Deputy Sheriff Making Return

Date Received

Name Of Sheriff (type or print)

Date Of Return

County Of Sheriff

STATE OF NORTH CAROLINA
COUNTY OF FORSYTH

FILED IN THE GENERAL COURT OF JUSTICE
DISTRICT COURT DIVISION
FILE No. 18 CVS 6516

2018 DEC 20 P 3: 58

STEVEN HEWETT

FORSYTH CO., C.S.C.

BY W
Plaintiff,)

v.)

COMPLAINT

CLIFTON J. KILBY, JR.,)

Defendant.)

Plaintiff complaining of the Defendant alleges and says:

PARTIES

1. Steven Hewett (hereinafter "Plaintiff") is a natural person and resident of Stokes County, North Carolina.
2. Upon information and belief, CLIFTON J. KILBY, JR., (hereinafter "Defendant") is a natural person and resident of Forsyth County, North Carolina.

JURISDICTION AND VENUE

3. This Court has jurisdiction over the subject matter of Plaintiff's claims pursuant to N.C. Gen. Stat. §§ 7A-240 and 7A-243.
4. Venue is proper in Forsyth County, North Carolina pursuant to N.C. Gen. Stat. § 1-82 since Defendant resides in Forsyth County.

FACTS

5. Plaintiff is widely known in his community as the plaintiff in Hewett v. City of King where on November 2, 2012, the Plaintiff challenged the constitutionality of certain monuments and symbols erected by the City of King, North Carolina. Specifically, Plaintiff challenged the flying a Christian flag in the City's Central Park at the Veterans memorial; erecting and maintaining a statue depicting a soldier kneeling in front of a

cross in the City's Central Park at the Veterans Memorial; and hosting invocations, benedictions, and other alleged Christian practices at memorial events held at the Veterans Memorial.

6. The American Legion and American Legion Post 290 ("Post 290") intervened in *Hewett v. City of King* to support the display of the kneeling soldier monument.
7. The Defendant was an active member of the American Legion during *Hewett v. City of King*. July 10, 2017 Defendant became the Commander of Post 290.
8. Plaintiff and the City of King settled the suit for \$500,001 (Plaintiff received \$1, and \$500,000 was given in attorneys fees). The City of King also removed the flag and statue as part of the settlement.
9. Upon information and belief, Defendant and other members of Post 290 came to resent the Plaintiff for his success in having the Christian symbols removed.
10. Plaintiff maintained his political activity in the community and protested candidate Trump by peaceably distributing flyers and holding a political sign at a polling station located at Post 290 on November 8, 2016.
11. A group of legionnaires from Post 290 were upset by Plaintiff's displaying a political sign opposing candidate Trump. On November 08, 2016 at the polling place located at Post 290, Ronald Shouse, one of the legionnaire members, drove his truck into Plaintiff striking Plaintiff's leg.
12. On November 08, 2016, Ronald Shouse was charged with assaulting Plaintiff with deadly weapon and careless and reckless driving.
13. Legionnaire members responded to the charge against Ronald Shouse. They wrote statements to the King Police Department stating that Plaintiff had been disorderly at the polling place. Legionnaires themselves took out a criminal summons against Plaintiff in retaliation for King Police charging Ronald Shouse. Plaintiff was eventually charged with disorderly conduct, but the charges were later dismissed.
14. Upon information and belief, Defendant remained active in the plot with the legionnaires to achieve revenge against Plaintiff. They sought revenge against Plaintiff for his stance that Veterans should not vote for Candidate Trump and his successful lawsuit that removed the Christian symbols.
15. On March 13, 2017, Post 290 unanimously voted that Plaintiff be expelled from membership and expelled from being physically present at Post 290.

16. Defendant was appointed by Post 290 to investigate the accusations, made by Post 290 member Jimmie Rosamon, lodged against Plaintiff. Defendant swore to an affidavit in support of Plaintiff's expulsion from Post 290 both from membership and physical presence.
17. Once Plaintiff was banned from Post 290, concerns grew as to the legality of Post 290 remaining a polling place.
18. On July 11, 2017, Defendant wrote to Jason Perry, informing the Stokes County Board of Elections that Plaintiff was banned from the property. Defendant sought to keep the polling place at Post 290 despite the fact Plaintiff was banned from the premises.
19. Upon information and belief, Defendant had knowledge that Plaintiff sought public office to the City of King's City Council, but still sought to Post 290 remain a polling place as a political tactic to harm Plaintiff's run for city council.
20. On August 17, 2017, Kim Westbrook Strach, Executive Director of the State Board of Ethics and Elections Enforcement, stated by letter that effective immediately the polling place was to be moved. That Post 290, as a polling place, was in violation of State law. That a polling place cannot remain at a property where persons are banned.
21. Despite this letter from the Executive Director, on August 22, 2017 Defendant openly dissented from Kim Westbrook Strach's opinion by publicly speaking in opposition at the Stokes County Board of Elections meeting where a vote was held whether to move the polling place from Post 290, to another location.
22. Defendant, a Forsyth County resident, was unsuccessful in his appeal to the Stokes County Board of Elections. The Board moved the polling place from Post 290 to a local library.
23. Defendant, as early as May 17, 2017, openly ran for Sheriff of Forsyth County, his home county in North Carolina.
24. Plaintiff opposed Defendant's run for Sheriff by making the public aware of Defendant's activities in the community, including the negative experiences Plaintiff had with Defendant.
25. Plaintiff created a Facebook page and website to share his opposition to Defendant becoming a sheriff. Plaintiff electronically communicated to Defendant several times expressing his opposition to Defendant's political run.
26. On January 12, 2018, Defendant went before a magistrate in Forsyth County. There, he wrote in an affidavit that Plaintiff had "...made posts that he fired his 10/22 rifle which is

made to harass and inimate, me, my family and close personal associates, he has also offer a reward for information.”

27. On January 12, 2018, Magistrate W.J. Glascoff found probable cause existed to issue a criminal summons. That there was probable cause to believe Plaintiff cyber stalked Defendant. Specifically, that Plaintiff sent electronic communication to Defendant threatening to inflict bodily harm on Defendant.
28. Four days later, January 16, 2018, Defendant filed a “Complaint for No-Contact Order for Stalking or Nonconsensual Sexual Conduct.” In Defendant’s Complaint, he again referred to a “10/22 rifle” owned by the Plaintiff and that Plaintiff made statements to threaten, torment and terrorize Defendant and Defendant’s family and close associates.
29. Defendant in his Complaint specifically requested that Plaintiff be ordered to not attend any “political meetings in Forsyth County.”
30. On January 16, 2018 an ex parte hearing was held on whether a temporary civil no-contact order should be entered. Based on the evidence before the Court, the Judge entered a civil no-contact order. The order specifically set forth that Plaintiff not to be present at the Forsyth County Democratic Headquarters, among other prohibitions.
31. The civil no-contact hearing and the cyberstalking criminal charges came to trial on June 07, 2018.
32. On June 07, 2018, Judge Bill Davis dismissed the civil no-contact order for Defendant’s failure to present evidence that he suffered emotional distress. Judge Davis also dismissed the criminal cyberstalking charges because Plaintiff’s speech was protected by the First Amendment of the United States Constitution.

FIRST CLAIM FOR RELIEF

MALICIOUS PROSECUTION – CIVIL PROCEEDING

33. Plaintiff incorporates paragraphs 1-32 as if fully set forth herein.
34. Defendant instituted a N.C. Gen. Stat. § 50C-2 civil proceeding against the Plaintiff for stalking.
35. Defendant instituted said proceeding without probable cause.
36. The civil proceeding lacked probable cause for the following reasons:
 - a. That Defendant never suffered emotional distress;
 - b. That Defendant instituted the proceeding knowing he had not suffered emotional distress;

- c. That because of Defendant's misleading representations about the 10/22 Rifle, the magistrate concluded probable cause existed based on false information;
 - d. That the facts as they existed at the time did not establish probable cause to believe that Plaintiff placed Defendant in fear of death, bodily injury, or continued torment or terror;
 - e. That a reasonable person under the same circumstances would not have believed probable cause existed to institute a N.C. Gen. Stat. § 50C-2 civil proceeding.
37. Defendant instituted the civil proceeding against the Plaintiff with malice.
38. Malice by Defendant is demonstrated by the following:
- f. Defendant, being a self-proclaimed Christian, sought revenge on Plaintiff for his success in having Christian memorials removed;
 - g. That Defendant intended to use the civil proceeding against the Plaintiff to prevent the Plaintiff from speaking negatively about Defendant's campaign for sheriff;
 - h. That Defendant sought revenge against the Plaintiff for the charges that resulted from legion member Ronald Shouse's assault with his truck that struck the Plaintiff.
39. The civil proceeding ended in Plaintiff's favor when Judge Bill Davis dismissed the civil proceeding for failure to prove that Defendant had suffered emotional distress.
40. As a result of the institution of the civil proceeding by Defendant, Plaintiff suffered special damages.
41. Plaintiff suffered special damages in that there occurred a substantial interference with Plaintiff's person because he was restrained for ten (10) days from being near Defendant and from the Forsyth County Democratic Headquarters. Plaintiff's person was restrained further when the temporary no-contact order was extended to February 9, 2018. At a hearing on February 9, 2018, Defendant then changed the criminal charges, extending the no-contact order until March 7, 2018 hearing date. The no-contact order was extended a third time when Judge Kazakos recused himself but kept the order in place. The fourth and final extension occurred when Defendant received an extension ex parte another ten days. In total, Plaintiff's person was restrained for fifty-three (53) days.

SECOND CLAIM FOR RELIEF
MALICIOUS PROSECUTION – CRIMINAL PROCEEDING

42. Plaintiff incorporates paragraphs 1-41 as if fully set forth herein.
43. Defendant instituted a criminal proceeding against the Plaintiff.
44. Defendant instituted a criminal cyberstalking charge against Plaintiff by testifying before a magistrate.
45. Defendant instituted the criminal proceeding against Defendant without probable cause.
46. The institution of the criminal proceeding was without probable cause for the following reasons:
 - i. Defendant swore to an affidavit stating the Plaintiff fired a 10/22 Rifle which Plaintiff did to harass and intimidate Defendant, his family and close personal associates;
 - j. That while Defendant stated that to the magistrate, no facts then present would lead a reasonable person in the same situation as Defendant to believe that a 10/22 Rifle was being used to intimidate the Defendant, his family or close personal associates;
 - k. That this fact is evidence by Defendant's failure to present any evidence at trial that Plaintiff used or owned a 10/22 Rifle;
 - l. That these statements were false but relied upon by the magistrate in determining probable cause existed;
 - m. That no reasonable person in the same situation as the Defendant would reasonably believe probable cause existed to institute criminal proceedings for any other allegations found in Defendant's affidavit.
47. Defendant instituted the criminal proceeding against the Plaintiff with malice.
48. Defendant's primary goal in instituting the criminal proceedings was to accomplish the collateral purpose of:
 - n. Keeping Plaintiff from negatively impacting Defendant's campaign;
 - o. Revenge on Plaintiff for his success in having the Christian symbols removed in the Hewett v. City of King lawsuit;
 - p. Revenge on Plaintiff for the charges that resulted when Ronald Shouse struck Plaintiff with his truck;

- q. Revenge on Plaintiff for the removal of the polling place from Post 290 because Plaintiff was barred from being present there.
49. The criminal proceedings for cyberstalking ended in Plaintiff's favor through a finding of not guilty after a full trial on June 07, 2018.

THIRD CLAIM FOR RELIEF
ABUSE OF PROCESS – CIVIL PROCEEDING

50. Plaintiff incorporates paragraphs 1-49 as if fully set forth herein.
51. Process was invoked when Defendant instituted a civil proceeding through his complaint for a civil no-contact order and obtained a temporary restraining order or no-contact order.
52. The process invoked was done with an ulterior purpose. The ulterior purpose was separate from, collateral to, the normal and regular purpose of the process.
53. The ulterior purpose of the Defendant was as follows:
- r. To get revenge on the Plaintiff for his success in having the Christian memorials removed;
 - s. To get revenge on Plaintiff for successfully having the polling place moved from Post 290 to a local library;
 - t. Revenge on Plaintiff for the charges that resulted when Ronald Shouse struck Plaintiff with his truck;
 - u. To keep Plaintiff from speaking negatively about Defendant's campaign for sheriff of Forsyth County;
 - v. To keep Plaintiff away from the Forsyth County Democratic Headquarters so that Plaintiff would not harm Defendant's campaign; and
 - w. To use the process issued as a means to allow the polling place to remain at Post 290.
54. After process was issued, the Defendant intentionally used the process invoked against the Plaintiff to accomplish the Defendant's ulterior purpose of revenge; keeping Plaintiff silent to further Defendant's campaign, to keep Plaintiff away from the Forsyth County Democratic Headquarters, and to keep the polling location at Post 290 to further support Defendant's campaign.
55. After process was issued, Defendant intentionally used the process invoked against Plaintiff to gain advantage over Plaintiff in obtaining revenge.

56. After process was issued, Defendant gained advantage over Plaintiff by keeping Plaintiff silent. Plaintiff's silence allowed Defendant to campaign without any negative political advertising by Plaintiff. Plaintiff's silence benefited Defendant's campaign for sheriff and harmed Plaintiff's right to peacefully protest a candidate Plaintiff did not support.

FOURTH CAUSE OF ACTION
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

57. Plaintiff incorporates paragraphs 1-56 as if fully set forth herein.

58. Defendant engaged in extreme and outrageous conduct by making false representations to a magistrate in order that civil and criminal process would be initiated against Plaintiff and by the continued prosecution of civil and criminal process.

59. This extreme and outrageous conduct was intended to cause severe emotional distress to Plaintiff.

60. Defendant's conduct did in fact cause Plaintiff severe emotional distress.

61. As a result of the conduct of Defendant, Plaintiff suffered severe emotional distress that no reasonable person could be expected to endure in that:

- x. Rapid weight loss and gain,
- y. Loss of sleep,
- z. Anxiety,
- aa. Necessity for medication;
- bb. Depression; and
- cc. Irritability.

PUNITIVE DAMAGES

62. Plaintiff incorporates paragraphs 1-61 as if fully set forth herein.

63. There exists fraud, malice and willful or wanton conduct by Defendant in his actions against Plaintiff in instituting civil and criminal proceedings against Plaintiff.

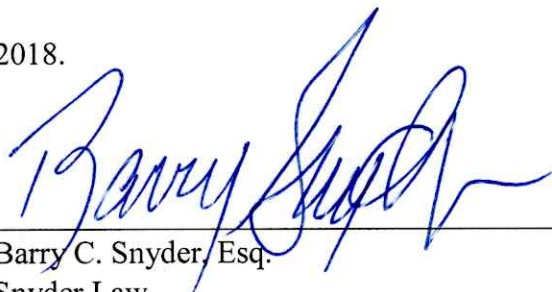
64. The fraud, malice and willful or wanton conduct was related to the injury to Plaintiff for which a jury will award relief on the previous claims of relief.

65. Defendant participated in the fraud, malice and willful or wanton conduct.

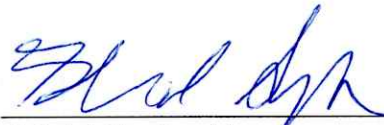
WHEREFORE, Plaintiff prays the Court that:

1. Plaintiff recover judgment against Defendant in an amount in excess of \$25,000;
2. Plaintiff recover punitive damages against Defendant;
3. Plaintiff recover the costs and expenses of this action from Defendant; and
4. Plaintiff recover and further relief that the Court deems appropriate.

This the 19 day of December, 2018.



Barry C. Snyder, Esq.
Snyder Law
Attorney for Plaintiff
Steven Hewett
210 W. Friendly Ave. Ste. 204
Greensboro, NC 27401
Tel.: (336) 574-3303
Fax: (336) 574-2324
E-Mail: Snyderlaw1@Att.net
North Carolina State Bar No. 10607
New York State Bar No. 1298538



Gabriel Snyder, Esq.
Snyder Law
Attorney for Plaintiff
Steven Hewett
210 West Friendly Avenue, Suite 204
Greensboro, North Carolina 27401
Tel. (336) 574-3303 Fax: (336) 574-2324
E-mail: gabegsnyder@gmail.com
North Carolina State Bar No. 52406