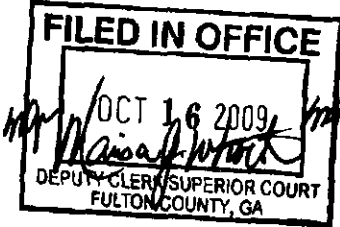


IN THE SUPERIOR COURT OF FULTON COUNTY  
STATE OF GEORGIA



CARLTON FIELDS, P.A., a Florida professional association, )  
)  
)  
Plaintiff, )  
)  
vs. )  
)  
LUDACRIS FOUNDATION, INC. and )  
CHRISTOPHER B. BRIDGES, )  
)  
Defendants. )

Civil Action File No. 2009CV176511

**COMPLAINT**

Plaintiff Carlton Fields, P.A. ("Carlton Fields") hereby sues Defendants Ludacris Foundation, Inc. (the "Foundation") and Christopher B. Bridges ("Bridges") (collectively, "Defendants") and in support thereof states as follows:

**JURISDICTION AND VENUE**

1. This is an action for damages in excess of \$15,000.00, exclusive of interest, costs, and attorneys' fees.
2. Carlton Fields is a Florida professional association with its principal place of business located at 1200 W. Peachtree Street, Suite 3000, Atlanta, Georgia 30309.
3. Ludacris Foundation, Inc. is a Delaware non-profit corporation with its principal place of business located at P.O. Box 768511, Roswell, Georgia 30076. The Foundation may be served with process on its registered agent at 2585 Almont Way, Roswell, Georgia 30076.
4. Upon information and belief, Christopher B. Bridges is a resident of Fulton County, Georgia.

5. This cause of action arises from Defendants' retention of Carlton Fields to represent them in litigation filed against defendants in the Superior Court of Fulton County. Venue is, therefore, proper in this Court, as the cause of action accrued in this jurisdiction.

**GENERAL ALLEGATIONS**

6. This is an action to collect attorneys' fees and costs due for legal services rendered to Defendants in connection with a litigation matter in the Superior Court of Fulton County, styled *Lawrence A. Hyde v. Roberta J. Shields, Christopher B. Bridges and Ludacris Foundation, Inc.*, Civil Action File No. 2007CV141333.

7. In March 2008, Defendants engaged Carlton Fields to represent them in the above-referenced personal injury/negligence action.

8. In addition to the legal services provided under the engagement letters signed by Defendants, Carlton Fields advanced to Defendants certain out-of-pocket expenses in connection with its representation of Defendants in that action.

9. The outstanding balance owed to Carlton Fields for services rendered and costs incurred is \$61,860.20. Defendants have refused to pay the outstanding balance due to Carlton Fields.

10. Having received no payment from Defendants, Carlton Fields' representation of the Defendants effectively ceased in April of 2009.

11. All conditions precedent to the filing of this lawsuit have either occurred or been waived.

**COUNT I: Breach of Contract**

12. Carlton Fields hereby incorporates by reference the allegations contained in paragraphs 1 through 11 above as though fully set forth herein.

13. Defendants are obligated to pay, but have breached their agreement by failing to pay, Carlton Fields the amount of \$61,860.20 for legal services provided and for costs incurred on their behalf.

14. Under the terms of their agreement, Defendants are liable to Carlton Fields for the amount due and owing for services rendered.

15. Carlton Fields has suffered damages in the amount of \$61,860.20, exclusive of pre-judgment interest as a result of Defendants' breach of the parties' agreement.

**COUNT II: Suit on Account**

16. Carlton Fields hereby incorporates by reference the allegations contained in paragraphs 1 through 15 above as though fully set forth herein.

17. Carlton Fields had a relationship with Defendants whereby Carlton Fields agreed to render legal services to Defendants in exchange for payment from Defendants.

18. Defendants maintained an account with Carlton Fields from March 2008 through April 2009 for the above-described services.

19. Defendants were made aware of the amounts due and owing on their account via monthly invoices.

20. Defendants did not render any objection to the invoices upon receipt or within a reasonable time thereafter.

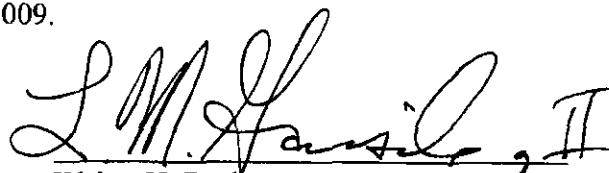
21. Defendants failed to pay \$61,860.20 due and owing on their account.

22. Defendants are liable to Carlton Fields in the amount of \$61,860.20 for legal services rendered and for costs incurred on their behalf.

WHEREFORE, Carlton Fields requests that this Court enter judgment against Defendants  
for:

- (a) \$61,860.20 in unpaid legal services and out of pocket costs;
- (b) pre-judgment and post judgment interest; and
- (c) any further relief that the Court deems just and proper.

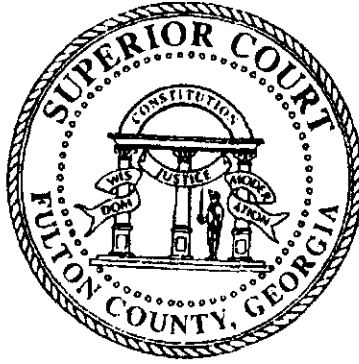
Submitted this 16<sup>th</sup> day of October, 2009.



Walter H. Bush  
Georgia Bar No. 098825  
Leonard M. Garside, II  
Georgia Bar No. 286822

CARLTON FILEDS, P.A.  
One Atlantic Center  
1201 West Peachtree Street  
Suite 3000  
Atlanta, GA 30309  
Tel: (404) 815-3400  
Fax: (404) 815-3415

*Attorneys for Carlton Fields, P.A.*



IN THE SUPERIOR COURT OF FULTON COUNTY, GEORGIA  
136 PRYOR STREET, ROOM C-103, ATLANTA, GEORGIA 30303

SUMMONS

CARLTON FIELDS, P.A.,

Plaintiff,

v.

LUDACRIS FOUNDATION, INC. and  
CHRISTOPHER B. BRIDGES,

Defendant.

Civil Action No. \_\_\_\_\_

TO THE ABOVE NAMED DEFENDANT:

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

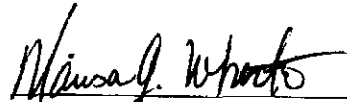
Walter H. Bush  
Carlton Fields, P.A.  
One Atlantic Center  
1201 West Peachtree Street, Suite 3000  
Atlanta, GA 30309  
Telephone: 404.815.3400

An answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. **IF YOU FAIL TO DO SO, JUDGMENT BY DEFAULT WILL BE TAKEN AGAINST YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT.**

This 16<sup>th</sup> day of October, 2009.

Honorable Cathelene "Tina" Robinson  
Clerk of Superior Court

By

  
Deputy Clerk