

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

DANTE R. SATTERFIELD,)
)
)
Plaintiff,)
)
)
vs.)
)
)
	Case No. _____
)
)
	JURY DEMANDED
TAJAE SHARPE and)
SEBASTIAN TRETOLA,)
)
)
)
Defendants.)
)
)

COMPLAINT

COMES NOW the Plaintiff, Dante R. Satterfield, the victim, and for his Complaint in this cause of action respectfully states as follows:

PARTIES

1. At all relevant times, Plaintiff, Dante R. Satterfield, was a resident of Nashville, Davidson County, Tennessee. Plaintiff is 5'9" tall and weighs 180 pounds.
2. Upon information and belief, Defendant, Tajae Sharpe, ("Defendant Sharpe"), at all relevant times, is a resident of Newark, New Jersey and a player for Tennessee Football, Inc. dba as the Tennessee Titans of the National Football League in Nashville, Davidson County, Tennessee ("Tennessee Titans"). Upon information and belief, Defendant Sharpe is 6'4" tall and weighs 201 pounds.

3. Upon information and belief, Defendant, Sebastian Tretola, (“Defendant Tretola”), at all relevant times, is a resident of San Bernardino, California and a player for the Tennessee Titans. Upon information and belief, Defendant Tretola is 6’4” tall and weighs 314 pounds.

4. Plaintiff alleges herein that Defendants’ intentional and negligent actions proximately caused his physical, mental, and emotional injuries.

5. Plaintiff brings this lawsuit to recover damages on account of his injuries and continued distress caused by Defendants assaulting him around midnight on the evening of Thursday, April 27, 2017 into the early morning hours of Friday, April 28, 2017.

JURISDICTION AND VENUE

6. Plaintiff incorporates paragraphs 1 through 5 as if restated here verbatim.

7. This Court has subject matter jurisdiction of this matter based on 28 U.S.C. § 1332, diversity of citizenship of the Plaintiff and the Defendants.

8. This is an action for damages in excess of \$75,000.00, exclusive of interest and costs.

9. Venue in this Court is appropriate, pursuant to 28 U.S.C. § 1391, because the attack on the Plaintiff occurred in the Middle District of Tennessee.

JURY DEMAND

10. Plaintiff incorporates paragraphs 1 through 9 as if restated here verbatim.

11. Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiff demands a trial by jury on all issues.

... continued ...

FACTS

12. Plaintiff incorporates paragraphs 1 through 11 as if restated here verbatim.

13. The National Football League, Inc. (“NFL”) owns and operates a football league in the United States and internationally. The NFL consists of 32 teams. Founded in 1920, in addition to the United States, the NFL has operations in Canada, China, France, Japan, Mexico, and the United Kingdom. Each year, the NFL season consists of four preseason games (“NFL Preseason”) and 16 regular season games (“NFL Season”).

14. One of the NFL’s 32 teams is the Tennessee Titans (“Titans”). The Titans are based and play their homes games in Nashville, Tennessee.

15. On Thursday, April 28, 2016, the NFL held its 81st annual meeting of NFL franchises to select newly eligible football players in Chicago, Illinois (“2016 NFL Draft”).

16. In the 2016 NFL Draft, the Titans selected Defendant Tajaе Sharpe, a wide receiver from the University of Massachusetts, in the fifth round (140th overall).

17. In the 2016 NFL Draft, the Titans selected Sebastian Tretola, an offensive guard from the University of Arkansas, in the sixth round (193th overall).

18. Defendants were named to the Titans’ roster and played for the Titans during the 2016 NFL season.

19. During the 2016 NFL Season, Defendant Sharpe played in all of the Titans 16 regular-season games.

20. For the 2016 NFL Season, Defendant Sharpe had 42 receptions for 522 yards and 2 touchdowns.

21. In the 2016 NFL Season, Defendant Tretola played in one regular-season game for

the Titans.

22. On Thursday, April 27, 2017, the NFL held its 82nd annual meeting of NFL franchises to select newly eligible football players in Philadelphia, Pennsylvania (“2017 NFL Draft”).

23. Upon information and belief, Titans Head Football Coach Mike Mularkey (“Coach Mularkey”) considered Defendant Sharpe’s performance during the 2016 season to be subpar.

24. Before the 2017 NFL Draft, Coach Mularkey stated, in a Tennessean article dated March 5, 2017, that Defendant Sharpe has to “prove himself all over again” after fading late in his rookie season.

25. In the 2017 NFL Draft, with its first pick (pick number five overall), the Titans selected Corey Davis (“Mr. Davis”), a wide receiver from Western Michigan University.

26. Upon information and belief, because the Titans drafted Mr. Davis with its first pick in the 2017 NFL Draft, Defendant Sharpe is likely to receive less playing time in the 2017 NFL Season and his job may be in jeopardy.

27. Upon information and belief, Defendant Sharpe was very upset by the Titans’ selection of Mr. Davis.

28. At or about 11:30 p.m. on April 27, 2017, Plaintiff was with Defendants at Tin Roof Nashville, which is a restaurant and bar located at 1516 Demonbreun Street, Nashville, Tennessee 37203 (“Tin Roof”).

29. Plaintiff and Defendants had a conversation about the 2017 NFL Draft and the Titans’ selection of Mr. Davis in the First Round.

30. Around 11:45 p.m., this conversation between Plaintiff and Defendants became heated.

31. At the air, Plaintiff made remarks about the 2017 NFL Draft and the effect of the Titans' selection of Mr. Davis would have on Defendant Sharpe.

32. Defendant Sharpe took exception to the comments made by Plaintiff.

33. Around 11:55 p.m. or shortly after midnight on April 28, 2017, Defendants told Plaintiff to follow them outside. Plaintiff believed the group was headed outside for lawful purposes.

34. As a result, Plaintiff followed the Defendants out the back door of Tin Roof to an alley.

35. In that alley, Defendants brutally assaulted Plaintiff.

36. Defendant Sharpe repeatedly hit Plaintiff in the face causing severe injuries.

37. Upon information and belief, Defendant Tretola served as a lookout who provided protection to Defendant Sharpe while Defendant Sharpe beat Plaintiff with his fists.

38. Upon information and belief, Defendants continued their assault even after Plaintiff lay helpless on the ground, unconscious, striking and bruising his face.

39. Plaintiff was beaten unconscious in the attack.

40. After the brutal assault, Defendants left Plaintiff unconscious in the alley alongside Tin Roof.

41. A bystander found Plaintiff and called 911.

42. Unconscious and unresponsive, Plaintiff was transported by ambulance to a local Nashville hospital.

43. Plaintiff did not regain consciousness for more than twelve (12) hours.

44. As a result of the assault, Plaintiff suffered a concussion, broken bones in the face, massive facial bruising, a perforated eardrum, among other injuries.

45. Photographs of some of the injuries, taken the next day, are depicted in Exhibit 1 to this Complaint.

46. Plaintiff never consented to a physical altercation of any kind with Defendants. Through this brutal assault, Defendants caused Plaintiff to suffer physical trauma, emotional distress, humiliation, and further caused him to incur expenses in the form of time and money to treat his physical, mental, and emotional injuries.

CAUSES OF ACTION

COUNT I ASSAULT AND BATTERY

47. Plaintiff incorporates paragraphs 1 through 46 as if restated here verbatim.

48. Defendant Sharpe intentionally, willfully, unlawfully and without justification threatened and then struck Plaintiff causing severe injuries to the person of Plaintiff. This Defendant, much bigger, taller, and stronger than Plaintiff, beat Plaintiff with his fists, and continued his assault even after Plaintiff was helpless and on the ground, striking and bruising him.

49. Defendant Tretola intentionally, willfully, unlawfully and without justification assisted Defendant Sharpe in his efforts to threaten and strike Plaintiff causing severe injuries to the person of Plaintiff. This Defendant, much bigger, taller, and stronger than Plaintiff, functionally served as a lookout while Defendant Sharpe beat Plaintiff with his fists, and encouraged the assault even after Plaintiff was helpless and on the ground, striking and bruising him.

50. Plaintiff did not, expressly or impliedly, give consent to the actions of Defendants.

51. Defendants are guilty of assault and battery upon the person of Plaintiff.

52. The assault and battery of Plaintiff by these Defendants was a direct and proximate cause of injuries and damage to the Plaintiff.

COUNT II
INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS

53. Plaintiff incorporates paragraphs 1 through 52 as if restated here verbatim.
54. Defendants committed the acts described in paragraphs 1 through 52, causing severe injuries to the person of Plaintiff.
55. Defendants' intentional conduct was so outrageous that is not tolerated in civil society and is in fact the basis for several crimes, including Aggravated Assault.
56. Defendants' intentional conduct has caused Plaintiff to suffer serious mental and emotional injuries that impair his enjoyment of daily life.

COUNT III
CIVIL CONSPIRACY

57. Plaintiff incorporates paragraphs 1 through 56 as if restated here verbatim.
58. Defendants participated in a common design to accomplish the assault and battery of Plaintiff. More specifically, but without limitation, these individuals conspired to isolate Plaintiff while simultaneously and in concert inflicting serious physical harm to Plaintiff's person.

DAMAGES

59. Plaintiff incorporates paragraphs 1 through 58 as if restated here verbatim.
60. Defendants have inflicted physical and emotional injury upon Plaintiff and serious emotional trauma and injury upon him.
61. Plaintiff has incurred, and continues to incur, damages for which he is justly entitled to compensation, including medical expenses, and physical and emotional pain and suffering as well as lost wages and future wage-earning capacity.

PUNITIVE DAMAGES

62. Plaintiff incorporates paragraphs 1 through 61 as if restated here verbatim.

63. Plaintiff is further entitled, by virtue of the willful, wanton, reckless and intentional nature of the wrongs of Defendants, to an award of exemplary and punitive damages in an amount sufficient to punish the Defendants for their wrongdoing and to deter them and others like them from committing such acts again in the future.

64. Because of the physical, mental, and emotional injuries proximately caused by Defendant's intentional conduct, Plaintiff is entitled to reasonable and proper compensation for the following legal damages:

- (a) Past and future physical pain;
- (b) Past and future mental and emotional anguish;
- (c) Past and future medical expenses;
- (d) Past and future counseling expenses;
- (e) Past lost wages and future lost wage-earning capacity; and
- (f) Punitive damages.

WHEREFORE, Plaintiff demands a trial of this cause by a jury and prays for a determination of the following:

- (a) that Defendants committed the intentional assault and battery against Plaintiff;
- (b) that Defendants intentionally inflicted emotional distress upon Plaintiff;
- (c) that Plaintiff is entitled to all damages listed above in an amount not less than five hundred thousand dollars (\$500,000.00);
- (d) that Plaintiff be awarded Court costs, including discretionary costs; and
- (e) that Plaintiff be awarded such other and further relief as this Court deems necessary

to effectuate justice between the parties.

Dated this 10th day of May, 2017.

RESPECTFULLY SUBMITTED,

BONE MCALLESTER NORTON PLLC

s/ J. Alex Little

By:

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