

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

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Mercutio Terrell Southall, Sr.)	
Carlos Montez Chaverst, Jr.)	
Plaintiffs,)	
v.)	Civil Action No:
)	
Birmingham Jefferson Convention Complex,)	
President of the United States, Donald J.)	
Trump, Donald J. Trump for President, Inc.)	
Fictitious Defendants 1-15)	
Defendants.)	

COMPLAINT

COME NOW, Mercutio Terrell Southall, Sr. (“Southall”) and Carlos Montez Chaverst, Jr. (“Chaverst”), (hereinafter, collectively, referred to as “Plaintiffs”) by and through their undersigned attorney, Richard A. Rice, complaining of the Birmingham Jefferson Convention Complex (“BJCC”), President of the United States of America, Donald J. Trump (“Trump”), Donald J. Trump for President, Inc. (“Trump Campaign”), and Fictitious Defendants 1-15, (hereinafter, collectively, referred to as “Defendants”), would respectfully show unto the Court the following:

1. The Plaintiff, Mercutio Terrell Southall, is a citizen of the State of Alabama, residing in Jefferson County and within the jurisdiction of this Court.
2. The Plaintiff, Carlos Montez Chaverst, Jr., is a citizen of the State of Alabama, residing at Jefferson County and within the jurisdiction of this Court.
3. The Defendant, Birmingham Jefferson Convention Complex, is a corporation incorporated under the laws of the State of Alabama and has its principal place of business in the jurisdiction of this Court. The BJCC is owned, in part, by the Defendant City of Birmingham.
4. The Defendant, Donald J. Trump for President, Inc., is a foreign corporate entity and has, at all times relevant to this action, operated in the jurisdiction of this Court and contracted with the Birmingham Jefferson Convention Complex and the City of Birmingham, and was allowed to conduct a campaign rally at the Convention Complex as discussed below.
5. The Defendant, Donald J. Trump, is a natural person, and a citizen of the State of New York. Defendant Trump is the current President of the United States of America, and a temporary resident of Washington, District of Columbia. Defendant Trump committed the

- tortious acts described below at the BJCC in Jefferson County, Alabama.
6. The Fictitious Defendants 1-15 are not now known to the Plaintiffs and will be identified upon further investigation and discovery. Fictitious Defendants 1-15 committed the tortious acts described below at the BJCC in Jefferson County, Alabama.
 7. The jurisdiction and venue of this Court attaches as the underlying action is based upon tortious acts committed against Plaintiffs in Jefferson County, Alabama.
 8. Plaintiffs bring this suit to recover for injuries sustained by the Plaintiffs as a result of the tortious acts of the Defendants, all of them. Plaintiffs' hereby file claims for premises liability negligence, battery, assault, incitement to riot, negligence, and breach of contract.
 9. That there exists video and audio footage of the incident made the basis of this suit evidencing the assertions hereby presented. Said footage has been shared worldwide via social media as a representation of the behavior and political discourse that is present here in Birmingham, Alabama.¹

¹ <https://www.youtube.com/watch?v=OeYTpzz6pxs>

10. The city of Birmingham has had a painful and ugly history in terms of its treatment of black people. This fact is well documented and still evident given the stringent racial and economic segregation that exists to this very day.²
11. For the purposes of demonstrating the emotional and psychological impact of the heinous actions and omissions alleged herein, the undersigned will briefly highlight portions of this historical treatment of black people. Though not limited by the past, we must face it with an objective lens to move forward and achieve social cohesion, and become a world leader in our collective defense of human rights.
12. It is well documented that Birmingham was referred to as “Bombingham” because of the large number of homes and churches owned by blacks that were bombed for the purpose of maintaining racial segregation in the provision of housing and to suppress any dissent.³
13. The 1963 bombing of the 16th Street Baptist Church galvanized the nation and showed the world the brutality which black people were

² <http://viz.edbuild.org/maps/2016/fault-lines/>

³ <http://www.npr.org/sections/codeswitch/2013/09/18/221790880/50-years-later-birmingham-is-still-subtly-divided>

- experiencing.⁴ It is shocking to see that at a rally at the BJCC, a publicly funded facility, black residents were brutally attacked by a white mob for the purpose of suppressing political dissent.
14. Today, Birmingham is a 74% black city with a poverty rate of over 30% for all households and that number approaches 50% for single parent households.⁵
15. To be clear, both bombings and poverty are varying forms of violence committed by humans against the human race.
16. On the date in question, Trump held a campaign rally at the BJCC, located in the heart of Birmingham's newly developed "Uptown" district. Plaintiffs exercised their right to attend that campaign rally and were assaulted and beaten by angry Trump supporters as a result. At the time of this attack, such conduct had become a normal occurrence at Trump campaign rallies and events. Trump, on video, has repeatedly incited his supporters to violence and has even offered to pay attorney's fees in their defense.⁶
17. The footage of the attack is a reflection of Birmingham's ugly racist past. A past where blacks were routinely set upon and beaten by angry

⁴ <http://www.history.com/topics/black-history/civil-rights-movement/videos/bombing-of-the-16th-street-baptist-church>

⁵ <http://www.census.gov/quickfacts/table/PST045215/0107000>

⁶ <http://www.nytimes.com/politics/first-draft/2016/03/13/donald-trump-says-he-may-pay-legal-fees-of-accused-attacker/?r=0>

mobs as a tried and true measure of intimidation and domestic terrorism.

18. On one hand, the Trump campaign designated and publicized a formal mantra for the Republican National Committee and their followers, “Make America Great Again.” On the other hand, Donald J. Trump, and the Trump Campaign, created a spirit that promoted physical violence and hate (and still continues to do so as President) represented in campaign statements by Trump as listed below. To be certain, the undersigned has intentionally listed the respective Trump quotes with the overall campaign mantra immediately following as well.⁷

a. “Knock the crap out of him, would you? Seriously.”

i. Make America Great Again.

b. [Trump in reference to a demonstrator] “Get em out, Get them out of here.”

i. Make America Great Again.

c. “In the good old days, this doesn’t happen. Because they used to treat them very very rough, because when they protested once they wouldn’t do it again so easily.”

⁷ <http://www.dailynewsbin.com/news/secret-service-had-to-protect-msnbcs-katytur-after-donald-trump-incited-crowd-against-her/25605/>

- i. Make America Great Again.
 - d. [Trump in reference to a demonstrator] “I’d like to punch them in the face, I tell you.”
 - i. Make America Great Again
 - e. “I love the old days. Do you know what they used to do to guys like that in a place like this? They’d be carried out on a stretcher, folks.”
 - i. Make America Great Again.
 - f. “In the good old days, they’d rip him out of that seat so fast.”
 - i. Make America Great Again.
 - g. “In the good old days, law enforcement acted a lot quicker than this. A lot quicker.”
 - i. Make America Great Again.
 - h. “I am the law and order candidate.”
 - i. Make America Great Again.
19. Prior to the events complained of herein, the Defendants, Trump and the Trump Campaign presented conduct and speech known to incite hate and violence at previous rallies and events to include:
- a. “[T]hat will never happen with me. I do not know if I will do the fighting or if other people will but you can believe me that

[protesting/stating opposing viewpoints at my event] will never happen to Trump.” (Excerpt from an August 2015 campaign rally where Defendant Trump referenced footage he had viewed of Black Lives Matters protestors during a Bernie Sanders campaign)

- b. In September 2015, a group of human rights activists of Mexican descent were violently attacked by Defendant Trump security guards whilst protesting a Trump campaign event.
- c. Another man was spat on during a Trump rally.
- d. A Boston homeless man was beaten by self-identified Trump supporters.
- e. Another man was violently dragged out of a Trump campaign event.

20. The Defendants, The City, BJCC, Trump, and the Trump Campaign, must be held responsible for failing to provide the required leadership and security necessary for the rally since they knew or should have known that attacks and assaults were becoming a commonplace occurrence at other Trump related events. Moreover, Trump and the Trump Campaign’s intentional acts of inciting violence should not go unpunished and should be discouraged in every way possible.

21. Plaintiffs' attendance at the rally was an exercise of their rights under the US Constitution and did not justify the ensuing violence against them.
22. Plaintiffs are seeking a judgment that orders Defendants, all of them, to pay for damages, for Defendants The City, BJCC, Trump and the Trump Campaign to institute new procedures for security at future politically and racially charged events, and for Defendants, all of them, to issue a public apology to Plaintiffs.
23. Publicly funded institutions, such as the BJCC, and the boards that oversee their activities should adhere to a standard of care that promotes equity and demands that everyone is treated fairly and with respect.
24. The Plaintiffs assert that one should not be brutally attacked while attending events at BJCC. On May 2, 1963, teen-agers and children, some as young as six, marched in Birmingham to protest segregation.⁸
25. Plaintiffs' as members of a group organized by Mark Myles, a well-known regional-organizer for livable wages, obtained tickets from an online vendor to attend a political rally organized by the Donald F.

⁸ **"The Birmingham Children's Crusade of 1963"**

<http://www.biography.com/news/black-history-birmingham-childrens-crusade-1963-video>

Trump for President, Inc. and hosted by the Birmingham Jefferson County Convention Center.

26. Mark Myles, and Plaintiff Southall, arrived at the event early and waited in line to enter the BJCC.

27. Shortly after their arrival, there was an extended line of other attendees.

28. Plaintiff Southall, and Mark Myles spoke with a reporter who asked them if they were uncomfortable due to some of the hate speech and racially charged commentary.

29. Prior to entering the BJCC, Mark Myles left the event, and Alecha Irby, a Miles College student and local activist, entered a security area with Plaintiff Southall.

30. As Irby, and Plaintiff Southall, entered the BJCC they noticed several Birmingham Police Department Police Officers who appeared to recognize Southall and/or Irby.

31. Plaintiff Southall and Irby, moved through the crowd, talking to a few people, trying to get closer to the stage prior to the political rally starting.

32. Shortly after this time, now-President Donald Trump, then-Republican Nominee for the office of President of the United States of America walked out onto the stage.
33. At this time, Plaintiff Chaverst, an employee of the City of Birmingham and local activist, entered the BJCC and made contact with Irby and Plaintiff Southall.
34. Plaintiff Chaverst, held his cellular phone up over the crowd in order to record video footage of the event while speaking in a conversational tone with a non-threatening and non-animated manner. Plaintiff Chaverst, while recording, stated “we’re at the Donald Trump rally, here in Birmingham Alabama, and we want to inform Donald Trump he’s not welcome here. We need to dump the Trump” and his hate speech and divisive rhetoric.
35. Immediately at this time and without provocation, a white male, 6’1”, 220-230, balding, red hair, with freckles- part of Fictitious Defendants 1-15- slaps the phone out of Plaintiff Chaverst’s hand.
36. Plaintiff Chaverst, responded by saying, “Do not touch my phone.”
37. The unidentified man, part of Fictitious Defendants 1-15, described above responded with obscenities and referred to Plaintiff Chaverst as

“boy” and stated he could do whatever he wished to someone like Plaintiff Chaverst.

38. At this time, Plaintiff Southall, a former City of Birmingham police academy cadet and professional security guard, approached Plaintiff Chaverst and the unidentified man and protectively pushed Plaintiff Chaverst away from what Southall perceived to be an immediate threat of harm and further assault to Plaintiff Chaverst.

39. Plaintiff Southall then grabbed the back of Plaintiff Chaverst’s belt, took Irby’s hand, and began to attempt to safely move “his group” through the menacing crowd chanting “Black Lives Matter” in response to the crowd’s aggression and chants of “All Lives Matter”.

40. At this time, Fictitious Defendants 1-15, obvious Trump supporters, started shoving and becoming more aggressive toward Plaintiffs. There was kicking, pushing and yelling of racial slurs and other obscenities. The Fictitious Defendants 1-15, obvious supporters of Trump and his divisive and hateful rhetoric, responded increasingly with more aggression with racial slurs and hateful insults.

41. During this exchange, Plaintiff Chaverst was jostled violently and aggressively by the crowd and couldn’t continue to move forward.

Plaintiff Chaverst and Irby were forcefully separated from Plaintiff Southall.

42. At this time, Plaintiff Southall moved to the front of “his group” and protectively placed Plaintiff Chaverst, and Irby behind him.

43. Meanwhile, a female Trump supporter, part of Fictitious Defendants 1-15, approached Plaintiffs, and began sarcastically shouting “Excuse me” but made no effort to physically move her body from blocking Plaintiffs’ exit to a more secure location. The unidentified female Trump supporter, part of Fictitious Defendants 1-15, repeatedly repositioned herself to stand directly in the pathway of Plaintiffs and blocked their way, intentionally moving each time they tried to avoid her.

44. The violent melee and racial commentary ensued. Fictitious Defendants 1-15 was pushing, shoving and intentionally blocking Plaintiffs’ pathway. Trump began to use incendiary language that further incited the crowd, namely Fictitious Defendants 1-15, to acts of violence and use of racially charged hate speech towards Plaintiffs.

45. Plaintiff Southall, turned to look over his right shoulder and then his left, to check the status of “his group” and he did not see Plaintiff Chaverst, nor did he see Alecha Irby due to the size of the crowd and

the level of violence of the Trump led melee by Fictitious Defendants 1-15 - pushing, shoving, and yelling of racial slurs and insults.

46. The melee was in full force at this time and Plaintiff Southall was violently pushed against a chair and almost knocked over by Fictitious Defendants 1-15. At this time, Plaintiff Southall, was alone in the violent crowd of Fictitious Defendants 1-15 incited to violence by Trump against Plaintiffs. Plaintiff Southall unsuccessfully attempted to defend himself and was forcefully shoved to the ground by Fictitious Defendants 1-15. Plaintiff Southall, was then kicked, choked, shoved, punched, scratched and insulted with racial epithets by Fictitious Defendants 1-15. Plaintiff Southall again attempted to defend himself from Fictitious Defendants 1-15 by pushing them back but was substantially outnumbered by them. Each time Plaintiff Southall attempted to extricate himself from the assault and onslaught of physical violence, Fictitious Defendants 1-15 would overwhelm Plaintiff Southall and knock him back onto the ground.

47. Another unidentified woman, part of Fictitious Defendants 1-15, kicked Plaintiff Southall in the chest.

48. An unidentified man, part of Fictitious Defendants 1-15, kicked Plaintiff Southall, in the abdomen and stomach.

49. Another unidentified person, part of Fictitious Defendants 1-15, violently grabbed Plaintiff Southall by the neck and choked him while another unidentified person, part of Fictitious Defendants 1-15, twisted Plaintiff Southall's ankle.
50. Eventually, a police officer with the Birmingham Police Department began to attempt to stop the melee. At all times during the attack, Trump continuously yelled "get him the hell out of here" and made other incendiary statements further inciting the violent melee to continue against Plaintiffs.
51. These events, occurring on or about November 21, 2015 in Birmingham, Alabama were documented on video and shared across the globe. Moreover, the events represent a larger pattern of violence and hateful rhetoric occurring at Trump events across the nation during his campaign and at present.
52. This case was not the first, and has not been the last instance of physical and verbal violence against protesters of Trump and the Trump Campaign by Trump supporters. This conduct has occurred in the exact or similar manner at campaign rallies in Iowa, Nevada, Michigan, Missouri, Arizona, Wisconsin, North Carolina, and most

notably Kentucky where active litigation against Trump, his Campaign, and supporters is in process.

53. Michelle Fields, a Breitbart reporter, was grabbed and thrown to the ground at a Trump press conference by Trump's Campaign Manager, who was subsequently arrested for the attack. Notable because of Trump's affiliation with Breitbart founder and former White House Chief Strategist and Campaign employee, Stephen K. Bannon.

FIRST CLAIM - NEGLIGENCE – PREMISES LIABILITY

54. All paragraphs of this complaint are incorporated herein as if fully restated.

55. At the time of the Trump Campaign rally, Plaintiffs Southall and Chaverst, were invitees on Defendants the City of Birmingham's and BJCC's property as exercisers of their constitutionally protected right to free speech, assembly, and associated.

56. Defendants the City of Birmingham's and BJCC's knew, or in the exercise of ordinary care, should have known of the unreasonably dangerous conditions created by Trump, the Trump Campaign, and Trump supporters, namely Fictitious Defendants 1-15, and neither corrected nor warned the Plaintiffs of such conditions. Plaintiffs did not have any prior knowledge of the dangerous conditions and could

not reasonably have been expected to discover them. Plaintiffs reasonably believed there would be adequate security provided during the event. Defendants the City of Birmingham's and BJCC's failure to correct the condition or to warn Plaintiffs constituted negligence, and such negligence was a proximate cause of the injuries sustained by the Plaintiffs. Plaintiffs' conduct at the time in question was at all times reasonable and prudent, and nothing about Plaintiffs' conduct caused or contributed to this incident.

57. As a result of the attacks described above, Plaintiff Southall, suffered severe personal injuries including lacerations to his face, head and neck, a concussion, bruises to his back and torso areas and emotional distress. Some of Plaintiff Southall's injuries are, in reasonable probability, permanent in nature. Plaintiff Southall has suffered great physical pain and mental anguish due to such injuries inflicted by Defendants, all of them, and, in reasonable probability, will continue to suffer such pain and anguish in the future.

58. As a result of the occurrence described above, Plaintiff Chaverst, suffered severe personal injuries including bruising and emotional distress. Some of the injuries Plaintiff Chaverst suffered are, in reasonable probability, permanent in nature. Plaintiff Chaverst has

suffered great physical pain and mental anguish due to such injuries inflicted by Defendants, and, in reasonable probability, will continue to suffer such pain and anguish in the future.

59. As a result of such injuries, the Plaintiffs have been physically and psychologically impaired and disfigured and, unfortunately, will continue to be so impaired and disfigured in the future.

60. As a further result of the injuries described above, Plaintiffs have incurred medical expenses and, in reasonable probability, will continue to incur such expenses in the future.

61. As a further result of the injuries described above, the Plaintiffs have suffered a loss of earning and earning capacity and, in reasonable probability, will continue to suffer such losses in the future.

62. As a result of the personal injuries and economic damages set out in the foregoing paragraphs, the Plaintiffs, have each been damaged in the sum of at least One Million and No/1000 Dollars (\$1,000,000).

SECOND CLAIM - BREACH OF CONTRACT

63. All paragraphs of this complaint are incorporated herein as if fully restated.

64. Defendants, all of them, are obligated by contract and common law to act in good faith and to deal fairly with each person in attendance for the campaign rally in question.

65. Defendants, all of them, repeatedly breached their duties by:

- a. Failing to comply with constitutionally protected rights and public safety regulations regarding crowd control
- b. Failing to properly supervise their agents and employees including, without limitation its security and crowd control policies and procedures.

66. Plaintiffs, in purchasing and or obtaining a ticket to attend the political rally in question, entered into a contractual agreement with Defendants the City of Birmingham, BJCC, Trump, and the Trump Campaign. These named Defendants had a contractual duty to Plaintiffs to provide a reasonably safe venue and should have foreseen the type of harm suffered by Plaintiffs. However, the acts and omissions of these named Defendants were made with conscious disregard of the health and safety of Plaintiffs thus entitling Plaintiffs to punitive damages in an amount appropriate to punish or set an example of these Defendants.

67. Plaintiffs' claim all damages allowed under law.

THIRD CLAIM – INCITEMENT TO RIOT

68. All paragraphs of this complaint are incorporated herein as if fully restated.

69. There is video and audio footage of the attacks by Fictitious Defendants 1-15, Trump, and the Trump Campaign against Plaintiffs.

70. Trump directed Fictitious Defendants 1-15 to eject Plaintiffs, peaceful protestors, using harmful physical force. Trump and the Trump Campaign intended to create a public disturbance involving the assembling of five or more persons which would result in violent, tumultuous conduct that created grave danger of damage and/or injury, and created such disturbance by inciting Fictitious Defendants 1-15 to act violently towards Plaintiffs.

71. The incendiary speech of Trump incited Fictitious Defendants 1-15 to riot against the Plaintiffs and the resulting attacks caused grave injuries to Plaintiffs.

72. The remarks by Trump and the Trump Campaign were followed by acts of violence and imminent lawless action by Fictitious Defendants 1-15.

73. That as a result of Trump and the Trump campaign's conduct, Fictitious Defendants 1-15 engaged in violence causing injuries to the Plaintiffs.
74. Trump's and the Trump Campaign's conduct explicitly and/or implicitly encouraged the use of violence and/or lawless action by Fictitious Defendants 1-15 against Plaintiffs resulting in injuries.
75. Trump and the Trump Campaign knew or should have known of the resulting violent and angry aggressions and attitudes exhibited towards the Plaintiffs, as both people of color and protestors of Trump's presence and campaign.
76. That as a result of Trump's and the Trump campaign's acts, negligence, and/or wantonness of its employees, agents, and/or servants, Plaintiffs suffered injuries as. Trump's and the Trump Campaign's tortious conduct was the proximate cause of the tortious actions of the Fictitious Defendants 1-15 against Plaintiffs', and therefore Trump, the Trump Campaign, and the Fictitious Defendants 1-15 are liable to Plaintiffs and owe them compensatory and punitive damages as to be assessed by a jury.
77. Plaintiffs' claims all damages allowed under law.

**FOURTH CLAIM – NEGLIGENCE, GROSS NEGLIGENCE,
AND RECKLESSNESS**

78. All paragraphs of this complaint are incorporated herein as if fully restated.

79. Defendants, Trump, the City of Birmingham, BJCC, and the Trump Campaign had a duty under Alabama common law to provide adequate security in order to ensure the safety, protection, and well-being of all rally attendees and the general public connected thereto.

80. Defendants Trump, the Trump Campaign, the City of Birmingham, and BJCC breached the duties required by Alabama law, through their negligent, grossly negligent, and/or reckless actions, as set forth in this Complaint.

81. Defendants Trump, the Trump Campaign, the City of Birmingham, and BJCC acted with willful or wanton conduct with reckless, malicious, or conscious disregard for the rights or safety of others, namely the Plaintiffs. Defendants Trump, the Trump Campaign, the City of Birmingham, and BJCC was so deliberate, outrageous, and callous as to display total indifference to the health and safety of the Plaintiffs.

82. Defendants Trump, the Trump Campaign, the City of Birmingham, and BJCC knew or should have known that by encouraging members of the audience, namely Fictitious Defendants 1-15, to “get [Plaintiffs] out of here,” and to insinuate that the Plaintiffs deserved to be “roughed up” and would have been “roughed up” in the “good old days”, that Trump supporters would physically attack the Plaintiffs.

83. Defendants Trump, the Trump Campaign, the City of Birmingham, and BJCC relied on the crowd of Trump supporters, namely Fictitious Defendants 1-15, to provide security, including making them responsible for ejecting Plaintiffs who were peaceful protesters. Defendants Trump, the Trump Campaign, the City of Birmingham, and BJCC knew or should have known that such reliance on Fictitious Defendants 1-15 was inadequate and entirely reckless, or at least grossly negligent.

84. The directive to eject the Plaintiffs, all of whom were Black Americans and peaceful protestors, in a city known for racially charged violence and murderous acts, was entirely reckless, or at the least grossly negligent and Defendants Trump and the Trump Campaign knew or should have known the results of such a directive.

85. As a direct and proximate result of Defendants Trump's, the Trump Campaign's, the City of Birmingham's, and BJCC's breach of their duties, Plaintiffs have suffered losses and Plaintiffs' claim all damages allowed under law.

FIFTH CLAIM – BATTERY

86. All paragraphs of this complaint are incorporated herein as if fully restated.

87. As previously detailed, Fictitious Defendants 1-15, without any privilege or provocation on the part of the Plaintiffs, intentionally, maliciously, wantonly, and recklessly touched Plaintiffs in a harmful and offensive manner that was also angry, violent, rude and/or insolent.

88. As a result of these harmful and offensive contacts, Plaintiffs' suffered injuries and claim all damages allowed under law.

SIXTH CLAIM – ASSAULT

89. All paragraphs of this complaint are incorporated herein as if fully restated.

90. As previously detailed, Trump, the Trump Campaign, and Fictitious Defendants 1-15, without any privilege or provocation on the part of the Plaintiffs, intentionally, unlawfully, wantonly, and recklessly

attempted to put Plaintiffs in fear of harmful and offensive contact that was also angry, violent, rude and/or insolent, and the Defendants had the apparent present ability to effectuate the attempts.

91. As a result of these harmful and offensive attempts, Plaintiffs' suffered injuries and claims all damages allowed under law.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray that the Defendants be cited to appear and answer herein and that upon a trial of this cause, Plaintiffs recover judgment against the Defendant for the sum of at least One Million and No/100 Dollars (\$1,000,000), for interest thereon at the legal rate until paid, prejudgment interest as allowed by law, costs of the Court and general relief.

Respectfully Submitted,

/s/ Richard A. Rice

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PLAINTIFFS DEMAND A TRIAL BY JURY

Dated: November 19, 2017