

Cause No. _____

Cree Melvin,
Plaintiff,

v.

Robert Rihmeek Williams p/k/a Meek
Mill,
Defendant.

§ IN THE DISTRICT COURT
§
§
§
§ OF HARRIS COUNTY, TEXAS
§
§
§
§ _____ JUDICIAL DISTRICT

**PLAINTIFF’S ORIGINAL PETITION AND REQUEST FOR
DISCLOSURE**

Plaintiff, Cree Melvin, files this original petition and request for disclosure against defendant, Robert Williams p/k/a/ Meek Mill, and alleges as follows:

DISCOVERY-CONTROL PLAN

1. Plaintiff intends to conduct discovery under Level 2 of Texas Rule of Civil Procedure 190.3 and affirmatively pleads that this suit is not governed by the expedited-actions process in Texas Rule of Civil Procedure 169.

CLAIM FOR RELIEF

2. Plaintiff seeks monetary relief of over \$200,000 but not more than \$1,000,000. Tex. R. Civ. P. 47(c)(4).

PARTIES

3. Plaintiff, Cree Melvin, is an individual who resides in Harris County, Texas.
4. Defendant, Robert Rihmeek Williams p/k/a Meek Mill (Inmate Number ND8400), an individual, is currently incarcerated in the Chester County Prison, 501 S Wawaset Rd, West Chester, Chester County, Pennsylvania 19382 and may be served with process by certified mail.

VENUE

5. Venue is proper in Harris County, Texas, because the actions at issue occurred in Harris County, Texas.

FACTS

6. On or about February 3, 2017 at about 3:30 a.m. at “Dreams Lounge” located at 3321 Dixie Drive, Houston, Harris County, Texas 77021, Defendant Robert Williams committed an assault and battery against Plaintiff Cree Melvin.
7. Prior to the assault and battery, Ms. Melvin was at Dream Lounge enjoying herself. She was seated on a railing behind Mr. Williams, an internationally-known entertainer. Mr. Williams became involved in an argument with the owner of Dream Lounge. Gesticulating wildly during the argument, Mr. Williams repeatedly bumped into and struck Ms. Melvin who was still seated behind Mr. Williams. To avoid contact with Mr. Williams, Ms. Melvin moved farther away from Mr. Williams.
8. When Ms. Melvin was unable to move any farther away, she tapped Mr. Williams on his shoulder to let him know he was hitting her. Whereupon Mr. Williams turned around, shouted “bitch move,” and struck Ms. Melvin in the face. Defendant then stated, “I’m a made n****,” the implication being that, due to his financial and celebrity status, Ms. Melvin had no place asking him to not strike and bump into her. Because of Mr. Williams’s actions, Ms. Melvin suffered or incurred bodily injury, past and future pain and suffering, past and future loss of income, past and future medical expenses, and permanent disfigurement.

COUNT 1 – ASSAULT AND BATTERY

9. Defendant Robert Williams intentionally, knowingly, or recklessly caused bodily injury to Plaintiff Cree Melvin; threatened Plaintiff Cree Melvin with imminent bodily injury; and caused physical contact with Plaintiff Cree Melvin when Defendant Robert Williams knew or should have reasonably believed that Plaintiff Cree Melvin would have regarded the contact as offensive or provocative.
10. Defendant’s actions proximately caused injury to Plaintiff, which resulted in the following damages: bodily injury, past and future pain and

suffering, past and future medical expenses, permanent disfigurement, and past and future loss of income.

11. Exemplary damages. Plaintiff's injury resulted from Defendant's malice or gross negligence, which entitles Plaintiff to exemplary damages under Texas Civil Practice & Remedies Code section 41.003(a)(2) and (3). Specifically, Defendant intended to harm Plaintiff because she was not of the same financial or celebrity status as he was.

JURY DEMAND

12. Plaintiff demands a jury trial and tenders the appropriate fee with this petition.

REQUEST FOR DISCLOSURE

13. Under Texas Rule of Civil Procedure 194, Plaintiff requests that Defendant disclose, within 50 days of the service of this request, the information or material described in Rule 194.2.

PRAYER

14. For these reasons, Plaintiff asks that the Court issue citation for Defendant to appear and answer, and that Plaintiffs be awarded a judgment against defendant for the following:
 - a. Actual damages.
 - b. Exemplary damages.
 - c. Prejudgment and postjudgment interest.
 - d. Court costs.
 - e. All other relief to which Plaintiff is entitled.

Respectfully submitted,

/s/ Leroy Scott
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ATTORNEYS FOR PLAINTIFF

Unofficial Copy Office of Chris Daniel District Clerk