

5. Mr. Moore denies the allegations contained in paragraph five and demands strict proof thereof.
6. Mr. Moore denies the allegations contained in paragraph six and demands strict proof thereof.
7. Mr. Moore denies the allegations contained in paragraph seven and demands strict proof thereof.
8. Mr. Moore denies the allegations contained in paragraph eight and demands strict proof thereof.
9. Mr. Moore denies the allegations contained in paragraph nine and demands strict proof thereof.
10. Mr. Moore denies the allegations contained in paragraph ten and demands strict proof thereof.
11. Mr. Moore admits that the Washington Post published an article containing the false allegations made by Leigh Corfman.
12. Mr. Moore admits that three other women were named in the article and denies the remainder of the paragraph.
13. Mr. Moore denies the allegations contained in paragraph thirteen and demands strict proof thereof.
14. Mr. Moore denies the allegations contained in paragraph fourteen and admits that the allegations are false and constituted a desperate political attack.
15. Mr. Moore denies the allegations contained in paragraph fifteen and demands strict proof thereof.

16. Mr. Moore denies the allegations contained in paragraph sixteen and admits that he defended himself by reaffirming that the allegations were completely false, malicious, politically motivated and that such false allegations reflected the poor morality of our time, and that there was not one ounce of truth in the accusations.
17. Mr. Moore denies the allegations contained in paragraph seventeen and admits to filing a lawsuit.
18. Mr. Moore denies the allegations contained in paragraph eighteen but admits that the result of the polygraph demonstrated his truthfulness.
19. Mr. Moore admits the allegations contained in paragraph nineteen.
20. Mr. Moore admits the allegations contained in paragraph twenty.
21. Mr. Moore admits the allegations contained in paragraph twenty-one.
22. Mr. Moore denies the allegations contained in paragraph twenty-two and demands strict proof thereof.
23. Mr. Moore denies the allegations contained in paragraph twenty-three and demands strict proof thereof.
24. Mr. Moore denies the allegations contained in paragraph twenty-four and demands strict proof thereof.
25. Mr. Moore denies the allegations contained in paragraph twenty-five and demands strict proof thereof.
26. Mr. Moore denies the allegations contained in paragraph twenty-six and demands strict proof thereof.

27. Mr. Moore denies the allegations contained in paragraph twenty-seven and demands strict proof of how Leigh Corfman suffered “emotional and economic harm.” Mr. Moore further alleges that Leigh Corfman injected herself into an existing public controversy; a high profile and hotly contested senate race in which Mr. Moore was a candidate. In making allegations of sexual abuse, Leigh Corfman thrust herself into the vortex of the public controversy.
28. Mr. Moore cannot confirm or deny the allegations as listed herein, as Ms. Corfman subjected herself to public criticism by speaking with the Washington Post. Mr. Moore has no control over the public’s perception of a woman who thirty days before a high profile election made allegations of an incident that supposedly happened over 40 years ago.
29. Mr. Moore denies the allegations contained in paragraph twenty-nine and demands strict proof thereof.
30. Mr. Moore denies the allegations contained in paragraph thirty and demands strict proof thereof.
31. Mr. Moore denies the allegations contained in paragraph thirty-one and demands strict proof thereof.
32. Mr. Moore denies the allegations contained in paragraph thirty-two and demands strict proof thereof.
33. Mr. Moore admits the allegations in paragraph thirty-three.
34. Mr. Moore admits the allegations contained in paragraph thirty-four.
35. Mr. Moore admits that the Moore Campaign Committee was established under federal election law but avers that the Committee’s mailing address is P.O. Box

9, Gallant, AL in Etowah County. The Committee was inactive at the time of the filing of this suit.

36. Based upon information and belief, Mr. Moore admits that Leigh Corfman was approximately 14 years of age in 1979, and Mr. Moore was approximately 32 years of age.
37. Mr. Moore denies the allegations contained in paragraph thirty-seven and demands strict proof thereof.
38. Mr. Moore denies the allegations contained in paragraph thirty-eight and demands strict proof thereof.
39. Mr. Moore denies the allegations contained in paragraph thirty nine and demands strict proof thereof.
40. Mr. Moore denies the allegations contained in paragraph forty and demands strict proof thereof.
41. Mr. Moore denies the allegations contained in paragraph forty-one and demands strict proof thereof.
42. Mr. Moore denies the allegations contained in paragraph forty-two and demands strict proof thereof.
43. Mr. Moore denies the allegations contained in paragraph forty-three and demands strict proof thereof.
44. Mr. Moore denies the allegations contained in paragraph forty-four and demands strict proof thereof.
45. Mr. Moore admits the allegations contained in paragraph forty-five but denies knowledge of any rebroadcast.

46. Mr. Moore denies the allegations contained in paragraph forty-six and demands strict proof thereof.
47. Mr. Moore admits the allegations contained in paragraph forty-seven.
48. Mr. Moore denies the allegations contained in paragraph forty-eight and demands strict proof thereof.
49. Mr. Moore denies the allegations contained in paragraph forty-nine but admits making statement in defense of himself and questioning the timing and context of the allegations.
50. Mr. Moore admits the allegations contained in paragraph fifty.
51. Mr. Moore admits the allegations contained in paragraph fifty-one.
52. Mr. Moore admits the allegations contained in paragraph fifty-two.
53. Mr. Moore denies the allegations contained in paragraph fifty-three. Mr. Moore admits to making statements about the article published in the Washington Post and again defending himself against the false allegations.
54. Mr. Moore has no recollection of speaking with AL.com and while the statements are true, he denies calling Leigh Corfman a “liar.”
55. Mr. Moore admits the allegations contained in paragraph fifty-five.
56. Mr. Moore admits the allegations contained in paragraph fifty-six.
57. Mr. Moore admits the allegations contained in paragraph fifty-seven.
58. Mr. Moore admits the allegations contained in paragraph fifty-eight and admits denying knowledge of any woman who alleged sexual abuse.
59. Mr. Moore admits the allegations contained in paragraph fifty-nine.

60. Mr. Moore admits to speaking with Bill Britt but denies the context of the quoted statements as alleged in paragraph sixty.
61. Mr. Moore admits the allegations contained in paragraph sixty-one and admits to denying knowledge of any woman who made allegations of sexual misconduct or abuse.
62. Mr. Moore admits the allegations contained in paragraph sixty-two.
63. Mr. Moore denies the allegations contained in paragraph sixty-three and demands strict proof thereof.
64. Mr. Moore denies the allegations contained in paragraph sixty-four and demands strict proof thereof.
65. Mr. Moore denies the allegations contained in paragraph sixty-five but admits that Ms. Corfman's request cannot be fulfilled as the request asks him to lie.
66. Mr. Moore denies making false statements in any affidavit and denies the allegations contained in paragraph sixty-six.
67. Mr. Moore admits the allegations contained in paragraph sixty-seven, wherein Mr. Moore was listed as a Plaintiff in an action seeking to enjoin the certification of Doug Jones's election to the United States Senate on the basis of election fraud. He denies the Committee had any part in the lawsuit.
68. Mr. Moore admits to filing an affidavit wherein he successfully completed a polygraph examination confirming that the representations of misconduct made against him during the campaign were false. Mr. Moore denies that the allegations have no relevance to the relief sought for purported "election fraud" and avers that the allegations are directly relevant.

69. Mr. Moore denies and disagree with the assertion that the statements made in his affidavit were “isolated” and “out of context.”
70. Mr. Moore admits the allegations contained in paragraph seventy.
71. Mr. Moore admits the allegations contained in paragraph seventy-one.
72. Mr. Moore admits that the affidavit contained the results of the lie detector test which demonstrated his innocence against the women who accused him of sexual abuse; Leigh Corfman, Beverly Nelson and Tina Johnson.
73. Mr. Moore denies the allegations contained in paragraph seventy-three except as to say that the allegations are false and malicious, and demands strict proof thereof.
74. Mr. Moore denies the allegations contained in paragraph seventy-four and demands strict proof thereof.
75. Mr. Moore denies that he has made any falsehoods to this Court and denies all allegations contained in paragraph seventy-five.
76. Mr. Moore denies the allegations contained in paragraph seventy-six and demands strict proof thereof.
77. Mr. Moore denies the allegations contained in paragraph seventy-seven and demands strict proof thereof.
78. Mr. Moore denies making defamatory statements as alleged in paragraph seventy-eight and demands strict proof thereof.
79. Mr. Moore denies the allegations contained in paragraph seventy-nine and asserts that the Committee was only a financial committee and had absolutely

no control, supervisory authority or power over any individual or statements made by any individual during or after the campaign.

80. Mr. Moore denies the allegations contained in paragraph eighty and demands strict proof thereof.
81. Mr. Moore denies the allegations contained in paragraph eighty-one and demands strict proof thereof.
82. Mr. Moore denies the allegations contained in paragraph eighty-two and demands strict proof thereof.
83. Mr. Moore denies the allegations contained in paragraph eighty-three and demands strict proof thereof.
84. Mr. Moore denies the allegations contained in paragraph eighty-four and demands strict proof thereof.
85. Mr. Moore denies the allegations contained in paragraph eighty-five and demands strict proof thereof. Again, the Moore Campaign Committee's function was purely financial in nature.
86. Mr. Moore denies the allegations contained in paragraph eighty-six and subparts (a) through (e) and demands strict proof thereof.
87. Mr. Moore denies the allegations contained in paragraph eighty-seven and demands strict proof thereof.
88. Mr. Moore denies the allegations contained in paragraph eighty-eight and demands strict proof thereof.
89. Mr. Moore denies the allegations contained in paragraph eighty-nine and demands strict proof thereof.

90. Mr. Moore denies the allegations contained in paragraph ninety and demands strict proof thereof.
91. Mr. Moore cannot admit or deny the content of the statement made by Ms. Porter.
92. Mr. Moore denies the allegations contained in paragraph ninety-two and states that he has no knowledge of the alleged statements or of the context in which they were made.
93. Mr. Moore denies the allegations contained in paragraph ninety-three and states that he has no knowledge of the alleged statements or of the context in which they were made.
94. Mr. Moore denies the allegations contained in paragraph ninety-four and demands strict proof thereof.
95. Mr. Moore denies the allegations contained in paragraph ninety-five and demands strict proof thereof.
96. Mr. Moore denies the allegations contained in paragraph ninety-six and demands strict proof thereof.
97. Mr. Moore denies that the remarks listed in paragraph ninety-seven were directed towards Leigh Corfman as a result of any false statement that he made. Mr. Moore has no control or authority over statements made on social media and he denies the allegations made in paragraph ninety-seven and all subparts (a) through (h).

98. Mr. Moore cannot confirm or deny the allegations contained in paragraph ninety-eight, and avers that such allegations are common when injecting oneself a public controversy.
99. Mr. Moore denies the allegations contained in paragraph ninety-nine and demands strict proof thereof.
100. Mr. Moore repeats and realleges each and every answer to the paragraphs as if set forth fully herein and avers that Leigh Corfman has failed to properly plead and/or request relief for which can be granted.
101. Mr. Moore denies the allegations contained in paragraph one hundred one and demands strict proof thereof.
102. Mr. Moore partially admits the allegations contained in paragraph one hundred two, that he at times explicitly or implicitly identified Leigh Corfman. Mr. Moore denies that the Committee was responsible for any statements made.
103. Mr. Moore denies the allegations contained in paragraph one hundred three, and demands strict proof thereof.
104. Mr. Moore denies the allegations contained in paragraph one hundred four and demands strict proof thereof.
105. Mr. Moore denies the allegations contained in paragraph one hundred five and demands strict proof thereof.
106. Mr. Moore denies the allegations contained in paragraph one hundred six and demands strict proof thereof.
107. Mr. Moore denies the allegations contained in paragraph one hundred seven and demands strict proof thereof.

108. Mr. Moore denies the allegations contained in paragraph one hundred eight and demands strict proof thereof.

AFFIRMATIVE DEFENSES

Mr. Moore strongly denies all accusations of sexual abuse and sexual misconduct and further states that charges of crimes involving the sexual abuse of a child, as abhorrent as such crimes are, can only be brought within a time frame allowed by law. Leigh Corfman knew that she would be subjected to public scrutiny for waiting until long after the statute of limitations had run.

Mr. Moore pleads absolute privilege, qualified privilege, assumption of the risk, statute of limitations, repose, self-defense, truth of statement, unclean hands, unconscionability and denies that Leigh Corfman has, or will be able to prove, that she suffered defamation by Mr. Moore. He further avers that the Court has no jurisdiction to order him to retract the honest and truthful statements made by him, nor does the Court have the authority or jurisdiction to order him to publicly apologize to Leigh Corfman and refrain from further statements in defense of himself. Mr. Moore alleges that Leigh Corfman's request for costs and expenses of this action is inappropriate and should be denied.

WHEREFORE, premises considered, Mr. Moore avers that Leigh Corfman is not entitled to any of the relief requested.

COUNTERCLAIM for DEFAMATION

1. Leigh Corfman is over the age of nineteen and is a citizen of Etowah County, Alabama.
2. Mr. Moore is over the age of nineteen and is a citizen of Etowah County, Alabama.
3. Prior to November 7, 2017, Judge Roy Moore had won a run-off election against Luther Strange and obtained the Republican nomination for the Senate seat vacated by Jeff Sessions.
4. Prior to Leigh Corfman making statements to the Washington Post and prior to the article published by the Washington Post, Mr. Moore was approximately 11 points ahead of his Democratic rival, Doug Jones, in various election polls.
5. The race for the Senate seat was hotly contested, and the public controversy that existed drew national and even worldwide media coverage.
6. Prior to November 9, 2017, Leigh Corfman met with and made statements to a reporter and/or agent of the Washington Post regarding an alleged incident between her and Mr. Moore.
7. At the time Leigh Corfman spoke with reporters and/or agents of the Washington Post, the Senate race had drawn national and worldwide attention. Leigh Corfman knew, or should have known, that making statements to the Washington Post would garner public attention.
8. The statements made by Leigh Corfman were slanderous, libelous and were of such magnitude as to amount to defamation of Mr. Moore. No evidence other than the

self serving testimony of Leigh Corfman exists to support her contention that she was sexually abused or pursued romantically by Mr. Moore when she was fourteen years of age.

9. The statements made by Leigh Corfman accused Roy Moore, in his capacity as Deputy District Attorney, of sexually abusing her when she was 14 years of age. These statements were made despite no physical evidence of abuse, no documentary evidence of abuse, no corroborating police reports indicating that Leigh Corfman was abused, no corroborating court documents indicating Leigh Corfman was abused, and, in fact, no corroborating proof other than her allegation that she “vaguely” told a friend.

10. Leigh Corfman was a deeply troubled child whose behavior was so intolerable and uncontrollable, that her mother felt it necessary to transfer custody of her to her Father when she was fourteen years of age.

11. Leigh Corfman was a child who lacked discipline and structure and whose behavior was so worrisome to her parents that the parents agreed that it was best that she no longer reside with her mother.

12. After Leigh Corfman’s behavior was beyond what her mother could control, her parents entered into an agreement, which did not require a court appearance by her, wherein physical custody was transferred from her mother to her father.

13. Leigh Corfman was not required to attend any hearing when custody was transferred from her mother to her father.

14. Prior to the article published in the Washington Post, Leigh Corfman had no direct or indirect contact with Mr. Roy Moore at any time as a child or as an adult.

15. Leigh Corfman spoke with a reporter and/or agent from the Washington Post with the intention of telling the Washington Post that she was sexually abused by Mr. Moore.

16. Leigh Corfman knowingly, willingly and voluntarily made statements to the Washington Post regarding her alleged sexual abuse by Mr. Moore that she knew to be false.

17. Leigh Corfman knowingly, willingly and maliciously made statements she knew to be false to the Washington Post with the intention and knowledge that such statements would damage the reputation of Mr. Moore.

18. Leigh Corfman reported to the Washington Post that at the age of fourteen she attended a “child custody” proceeding where she was sitting outside the courtroom with her mother. Leigh Corfman stated that Mr. Moore approached her and her mother, and offered to “watch her” while her mother participated in the child custody hearing. Leigh Corfman further stated that Mr. Moore struck up a conversation wherein he asked her what school she went to and ultimately obtained her telephone number.

19. Leigh Corfman further falsely told a reporter and/or agent for the Washington Post that Mr. Moore picked her up on two occasions, drove her to his home, gave her alcohol, and sexually abused her.

20. Leigh Corfman falsely reported to the Washington Post that Mr. Moore took her to his home, laid a blanket and pillow on the floor, and removed her clothes. She further falsely reported to the Washington Post that Mr. Moore touched her over her bra and panties and “guided” her hand towards his penis.

21. Leigh Corfman stated that after her alleged encounter with Roy Moore her life began “spiraling downward.” This statement had the effect of placing blame on Mr. Moore for the numerous poor life decisions and lapses in judgment made by Leigh Corfman over the span of her lifetime which includes multiple failed marriages, multiple bankruptcy filings, inability to maintain stable employment, and associations with known drug traffickers and criminals.

22. Leigh Corfman failed to disclose to any media outlet that her life had been “spiraling downward” prior to her supposedly meeting Mr. Moore. In fact, Leigh Corfman was, by admission of her own parents, a “discipline and behavioral” problem such that her mother could no longer control her. Her status as a “disturbed” individual is documented in court records and has nothing to do with Mr. Moore.

23. The statements made by Leigh Corfman to the Washington Post were fabricated and malicious and made with the sole intent of defaming Mr. Moore so as to damage his reputation in the community, state, and nation and prevented his election to the U.S. Senate.

24. After Leigh Corfman made false and accusatory statements to a reporter and/or agent of the Washington Post, the Washington Post thereafter published an article titled *Woman says Roy Moore initiated sexual encounter when she was 14, he was 32*. The article was based upon the false allegations of Leigh Corfman.

25. After the article was published in the Washington Post Mr. Moore denied the allegations and accusations made by Leigh Corfman.

26. Leigh Corfman should have expected that Mr. Moore would publicly deny the allegations, which she made against him to the Washington Post, its reporters and/or its agents.

27. Leigh Corfman knew or should have known that the statements made to a national news medium would damage the reputation of Mr. Moore.

28. Leigh Corfman knew or should have known that any false statement regarding Mr. Moore's sexual abuse of a minor child would cause irrevocable damage to his reputation.

29. Leigh Corfman made statements damaging to Mr. Moore's reputation in an attempt to tarnish his reputation with the general public.

30. Leigh Corfman knew or should have known that her statements made to the Washington Post, its reporters and/or agents, would be disseminated, repeated and republished in other national forums as well as within the State of Alabama.

31. Leigh Corfman voluntarily injected herself into the vortex of the public controversy, which was the hotly contested U.S. Senate race, and by doing so, she became subject to public scrutiny and commentary.

32. The statements, comments and stories told by Leigh Corfman did indeed damage the reputation of Mr. Moore and caused damage to his campaign for U.S. Senate.

33. Beyond speaking with reporters and/or agents for the Washington Post, Leigh Corfman appeared and spoke with other local and national media outlets regarding the comments, statements and stories that she made to the Washington Post regarding her alleged interaction with Mr. Moore.

34. On November 20, 2017, Leigh Corfman gave an “exclusive interview” with the nationally televised *Today Show*, in which she stated that “a weight had been lifted” despite her claims of personal and financial damage. Leigh Corfman further characterized the alleged sexual abuse as a “seduction” and stated: “Um, I met him around the corner from my house, my mother did not know, and he took me to his home. Um, after arriving at his home, um, on the second occasion, that I went with him, he basically laid out some blankets on the floor and proceed to, um seduce me, I guess you would say, and during the course of that, he removed my clothing. Ah, he left the room and came back in wearing his white underwear and. Uh. He touched me over my clothing, what was left of it, and he, um, tried to get me to touch him as well. Um. And at that point I pulled back and said that I was not comfortable and I got dressed and he took me home.”¹

35. Leigh Corfman knew or should have known that recorded statements made during the nationally televised show, *The Today Show*, would be rebroadcasted, re-televised and redistributed to the detriment of Mr. Moore’s reputation and good standing with people of Alabama and nationwide.

36. Leigh Corfman’s expenses incurred pursuant to the nationally televised interview were paid on her behalf, and she received a paid-in-full trip to New York City.

37. Savannah Guthrie’s interview with Leigh Corfman was distributed and rebroadcast through several other media outlets, further disseminating the information Mr. Moore asserts as false to the general public and people of Alabama.

¹ See Today Exclusive, “Roy Moore Accuser Speaks Out” (Nov. 20th, 2017) <https://www.today.com/news/roy-moore-accuser-leigh-corfman-shares-why-she-went-public-t119062>. (last visited April 8th, 2017).

38. On November 28, 2017, AL.com, a far-reaching online media outlet based in Alabama, published an online article titled; “Exclusive: Accuser to Roy Moore, ‘Where does your immorality end?’²

39. Leigh Corfman hand delivered, in person, an “exclusive letter” to AL.com, wherein she denied being compensated for her story, denied being “rewarded” from Mr. Moore’s political opponents and indicated that she did not respond to Mr. Moore’s statements and statements from his campaign after the release of the Washington Post article as she deemed them to be “petty.”

40. On more than one occasion and with the intent to change the public’s perception of Mr. Moore, Leigh Corfman made statements to national and local media outlets disparaging the character, morality and overall decency of Mr. Moore.

41. After the publication and dissemination of her false statements, Leigh Corfman continued to make further false and defamatory statements and encouraged others to do so as well.

42. The false and malicious statements made by Leigh Corfman have been repeated by members of the general public, friends of Leigh Corfman, acquaintances of Leigh Corfman, and those who are politically adverse to Mr. Moore.

43. Mr. Moore avers that but for Leigh Corfman making false and malicious statements to members of national and local media, his reputation would not have suffered irrevocable damage that affected the outcome of the Senate election in December 2017.

² See AL.com, “Exclusive: Accuser to Roy Moore, ‘Where does your immorality end?’ (Nov. 28th, 2017), http://www.al.com/news/index.ssf/2017/11/roy_moore_leigh_corfman_accuse.html. (last visited April 8th, 2017).

44. Mr. Moore alleges that Leigh Corfman has long standing and well established personal relationships with individuals within the Democratic Party who have voiced their hatred and disdain for Roy Moore.

45. The statements made by Leigh Corfman were negligent, careless and made without due care and attention to their truthfulness or the effects that the statements had on Mr. Moore, Mr. Moore's campaign or his family.

46. The statements made by Leigh Corfman projected such hatred upon Mr. Moore and were made with the intention of ruining his reputation and lowering his good standing with the people of Alabama as well with the nation and beyond.

47. The statements made by Leigh Corfman were made with such reckless disregard of whether the statements were false or not, and the statements were of such injury to the reputation of Mr. Moore as to amount to defamation.

48. Leigh Corfman became a public figure, even if for a limited purpose, as she injected herself into a public controversy, voluntarily and knowingly, by the nature and extent of her participation. This voluntary injection into the public controversy gave rise to the critical statements about her from the general public, both locally and nationwide.

49. Leigh Corfman became a limited public figure by voluntarily injecting herself into the public debate about the qualifications and character of Mr. Moore to be elected to the U.S. Senate.

50. To date, Leigh Corfman has not retracted any of her statements which damaged the reputation of Mr. Moore, despite her knowledge that the statements were false.

51. Mr. Moore suffered irreparable harm and damages which are capable of being measured in money in an amount to be proved at trial.

52. The allegations of sexual abuse made by Leigh Corfman to media outlets in the context of a hotly contested Senate election constituted deliberate participation in a public controversy.

53. Without the assistance of this Court, Leigh Corfman will continue to make false statements which will only further damage Mr. Moore and cause him and his family substantial hardship personally, professionally and socially.

54. Leigh Corfman's action for defamation was brought without substantial justification. She should be responsible for all fees and costs associated with the defending of this action pursuant to the Alabama Litigation Accountability Act as detailed in 12-19-270, Ala. Code 1975.

55. Mr. Moore has suffered emotional, economic and occupational damage as a result of Leigh Corfman's defamatory statements.

56. As a natural result of Leigh Corfman's allegations that Mr. Moore engaged in an inappropriate sexual relationship with a minor, Mr. Moore was forced to defend himself, under a national spotlight, a mere 30 days before an election, leading to the loss of the Senate race. Mr. Moore avers that he will be able to calculate the damages during the trial in this matter.

57. Mr. Moore avers that the defamatory statements made by Leigh Corfman lowered his esteem in the community and is directly responsible for impairing his social association with others.

58. Mr. Moore avers that he should be awarded such other, further or different relief to which he may be entitled.

Wherefore, premises considered, Mr. Moore prays that upon a final hearing in this matter that he be awarded the following relief:

1. Find Leigh Corfman has intentionally, negligently, willfully, wantonly and maliciously defamed Mr. Moore resulting in damage to his reputation, occupation and social standing;
2. That Roy Moore suffered damages to his reputation and suffered loss of social standing within the community;
3. That this action was brought by Leigh Corfman without substantial justification, and that the action is frivolous and groundless in fact and that she be found liable for bringing such an action and ordered to pay all costs and fees associated with this suit;
4. Leigh Corfman should be held responsible and pay for all damages suffered by Mr. Moore as well as to pay the reasonable expenses and costs associated with defending against her allegations and the reasonable expenses and costs associated with his claims against her.
5. Award such other, further or different relief to which Mr. Moore may be entitled.

ROY MOORE DEMANDS A TRIAL BY JURY OF ANY AND ALL ISSUES BEFORE THE COURT AND TRIABLE BY A JURY.

Respectfully submitted on this the 9th day of April, 2018.

/s/Melissa L. Isaak
 Melissa L. Isaak (ISA 007)
 Attorney for Mr. Moore and the Committee
 The Isaak Law Firm
 PO Box 4894
 Montgomery, AL 36103
 334-262-8200 tel
 334-819-4072 fax

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of April, 2018, I electronically filed a copy of the foregoing document through the ALAFILE electronic filing service which will send notification of such filing to the following registered persons, and those persons not registered with the ALAFILE system were served by email:

Harlan I. Prater IV, Esq.
hprater@lightfootlaw.com
Melody H. Eagan, Esq.
meagan@lightfootlaw.com
Jeffrey P. Doss, Esq.
jdoss@lightfootlaw.com
Lightfoot, Franklin & White, LLC
400 20th Street North
Birmingham, AL 35203

Neil K. Roman, Esq.
nroman@cov.com
Clara J. Shin, Esq.
cshin@cov.com
Megan L. Rodgers, Esq.
mrodgers@cov.com
Covington & Burling LLP
The New York Times Building
620 Eight Avenue
New York, NY 10018

/s/Melissa L. Isaak
Of Counsel