

**IN THE STATE COURT OF DEKALB COUNTY
STATE OF GEORGIA**

Angelica Braatz,	*	
Individually and as Parent and Natural	*	JURY TRIAL DEMANDED
Guardian of Logan Braatz, a minor child,	*	
Deceased	*	
Plaintiffs,	*	
v.	*	Civil Action File No.: <u>17A67381</u>
LifeLine Animal Project, Inc.	*	
Defendant.	*	

COMPLAINT FOR DAMAGES

COME NOW Plaintiff Angelica Braatz, as Surviving Mother of Logan Braatz, a minor, and files this Complaint for Damages and Demand for Jury Trial, showing this Honorable Court as follows:

PARTIES, SERVICE AND JURISDICTION

1.

Plaintiff Angelica Braatz (hereinafter “Angelica” or “Plaintiff”) is the natural mother of Logan Braatz (hereinafter “Logan”), a minor, deceased. Logan did not leave a surviving spouse or child. Accordingly, pursuant to O.C.G.A. §19-7-1(c)(2)(B) Plaintiff Angelica is the proper party to bring an action for the wrongful death of her son, Logan.

2.

Plaintiff Angelica will be appointed as the Administrator of the Estate of Logan Braatz. Accordingly, pursuant to O.C.G.A. §51-4-5(b) she is the proper party to bring an action on behalf of the Estate of Logan Braatz.

3.

Defendant LifeLine Animal Project Inc. (hereinafter “LifeLine”) is a domestic corporation existing under the laws of the State of Georgia, with its principal office address at 129 Lake Street, Dekalb County, Avondale Estates, Georgia 30002. LifeLine may be served with a Summons and Complaint through its registered agent, Rebecca Guinn at 129 Lake Street, Dekalb County, Avondale Estates, GA 30002.

4.

Venue and jurisdiction is proper in this Court.

BACKGROUND & FACTS COMMON TO ALL CAUSES OF ACTION

A. THE ATTACK

5.

On January 17, 2017, Logan was 6 years old and a resident and citizen of Fulton County, Georgia.

6.

On January 17, 2017, Logan was walking from his home to his bus stop in his Southwest Atlanta neighborhood in order to attend Kindergarten. Logan was walking with a group of children and adult chaperones who lived nearby. While en route, the group was approached by a pack of dangerous and vicious dogs, who were roaming free and loose on the streets. This was the same pack of dangerous and vicious dogs that neighbors had seen roaming free and loose in this Southwest Atlanta neighborhood previously – including the day before, January 17, 2017.

7.

This pack of vicious dogs dangerously approached the group of which Logan was a part. Adults attempted to keep the dogs away using bats and sticks, while the children

ran for safety. Many of the children were able to relocate safely away from the dogs. Tragically, Logan was not able to escape. At least one of the dogs found Logan in the back of an abandoned house at 86 Cerro Street SW, Fulton County, Atlanta, Georgia. Logan was viciously attacked.

8.

Officers and EMS personnel were immediately dispatched to the scene. First responders found Logan lying on the ground in the back yard of the house. Logan had multiple bite wounds to his throat and face and was in cardiac arrest. According to an EMS report, Logan had been in cardiac arrest for several minutes by the time they arrived. Logan was consciously suffering, and in pain, from this mauling for many minutes during and after the attack.

9.

Paramedics attempted lifesaving measures on Logan, to include CPR, chest compressions, oxygen, various infusions, and an injection of epinephrine. They tried to establish an adequate airway. Logan was then carried to the ambulance for transport to Grady Hospital.

10.

Lifesaving attempts continued at Grady, where ER doctors performed trauma procedures. Logan was intubated and additional rounds of epinephrine were injected into his body. Tragically, none of these measures could save Logan and he was pronounced dead. Logan's cause of death was listed as "Transection of the Airway" and "Sharp and Blunt Force Injuries of the Neck".

B. FULTON COUNTY ANIMAL CONTROL AND LIFELINE

11.

On December 17, 2012, many years before the fatal attack on Logan, LifeLine submitted a Technical Proposal (hereinafter “Proposal”) to Fulton County’s Animal Services Department to “operate Fulton County Animal Services (FCAS)” and to be the organization charged with enforcing and carrying out the applicable Fulton County Code of Ordinances. The territory covered by the Proposal includes the Southwest Atlanta neighborhood where Logan’s family lives and the area where the attack at issue occurred.

12.

In their Proposal, LifeLine represented that they would “create a model of modern animal control” and would effectively carry out tasks such as responding to requests for service in the field in an effective and timely manner and enforce leash and dangerous animal laws.

13.

Among other things, LifeLine’s projected Scope of Work included meeting all enforcement and service response requirements in order to enforce the Fulton County Animal Ordinances and a promise to dispatch animal control officers to necessary calls.

14.

LifeLine’s proposal was submitted so that the company could receive a lucrative contract paid by Fulton County and its taxpayers. Such contract would, however, give LifeLine the responsibility to provide Animal Control Services for the purpose of protecting residents and citizens of Fulton County, including Logan.

C. LIFELINE'S CONTRACT WITH FULTON COUNTY

15.

Based on LifeLine's representations and assurances to Fulton County in their Proposal, Fulton County entered into an agreement with LifeLine to provide "Fulton County Animal Services" (hereinafter "Contract") to the County and its citizens on or around March 15, 2013. This Contract included renewal terms and was in full effect and force on January 17, 2017. This Contract had been in effect for nearly four years at the time of the attack on Logan.

16.

Exhibit C of the Contract outlines LifeLine's Scope of Work. Section 3.3.1 of Exhibit C, entitled 'Enforcement and Service Response,' outlines some of LifeLine's responsibilities, including, but not limited to:

- (a) LifeLine's Animal Service Officer's (hereinafter "ASO") shall respond to requests for service called into the dispatcher at Animal Control Center;
- (b) LifeLine shall partol areas of Fulton County on a scheduled basis and to impound stray dogs that are subject to impoundment;
- (c) LifeLine shall enforce the regulations governing dangerous animals and to provide services in accordance with the State of Georgia and Fulton County Animal Control Ordinances;
- (d) LifeLine ASO's shall generally assist the citizens of Fulton County who have requested help with domestic animal problems in a professional manner;
- (e) LifeLine shall maintain the capability to receive calls from the public on a twenty-four (24) hours, seven (7) days per week basis and accept and record requests for service and provide information to the public;

(f) LifeLine shall provide an answering service or other method to respond to emergency calls twenty-four (24) hours, seven (7) days per week.

17.

Section 3.3.1.1 of Exhibit C entitled 'Response to Service Requests' outline additional responsibilities of the LifeLine ASO's. These include, but are not limited to:

- (a) LifeLine ASO's shall be dispatched so as to handle requests for service in a timely manner;
- (b) A standard for which scheduled dispatch of ASO's shall be available to the public – including having radio contact and answering service capabilities when dispatch is not scheduled.

Section 3.3.9 of Exhibit C outlines the performance standards by which Fulton County was to assess LifeLine's performance of the above including LifeLine's timeliness and responsiveness to requests for service by Fulton County citizens, like Logan and his neighbors.

18.

Section 3.3.6 of Exhibit C, entitled 'Customer Service,' outlines LifeLine's obligations to the public in terms of their twenty-four (24) hours per day and three hundred sixty five (365) days per year responsibilities to the citizens of Fulton County, like Logan, and the accessibility of the Animal Control Facility and customer service recorded telephone messages.

19.

Section 3.3.7 of Exhibit C entitled 'Public Relations/Public Education' outlines and underscores LifeLine's responsibilities to Fulton County citizens, like Logan, in

terms of how to reduce the number of dog bites and to generally present information regarding animal control issues.

20.

Section 3.3.12 of Exhibit C entitled 'Vehicles' outlines how LifeLine was required to utilize County owned vehicles in carrying out the stated Scope of Work.

21.

Section 3.3.14 of Exhibit C entitled 'Personnel' requires LifeLine to employ a certain minimum amount of designated personnel to properly carry out the stated Scope of Work.

22.

Section 13.14.4 of Exhibit C entitled 'Training' emphasizes the need for, and outlines the types of, staff training plans that LifeLine must provide and develop in order to properly carry out the stated Scope of Work.

23.

Based on the above Sections, as well as others in the Contract, at all times pertinent herein, LifeLine was responsible for Animal Control Services for the entirety of Fulton County and its citizens. This responsibility included Logan's Southwest Atlanta neighborhood and the area of the attack at issue. It was LifeLine's responsibility and duty to protect Southwest Atlanta citizens, like Logan, from loose animals and dogs and roaming vicious and dangerous dogs. It was LifeLine's responsibility to create a safe environment with respect by animal control within Fulton County, by enforcing the above ordinances, properly and timely respond to calls of loose dogs, and complying with the terms of the Contract. It was LifeLine's responsibility to employ the proper amount of staff to respond to service calls and establish 24/7 contact capabilities. It was

LifeLine's responsibility to use its resources in a fashion to serve all of Fulton County. It was LifeLine's responsibility to instill confidence in the community, through their actions, that they would properly respond to reports of roaming vicious and dangerous dogs.

D. THE PROBLEM WITH DANGEROUS DOGS IN LOGAN'S NEIGHBORHOOD PRIOR TO JANUARY 17, 2017

24.

Prior to January 17, 2017, there was a reoccurring problem with dangerous and vicious dogs in and around the streets of Logan's Southwest Atlanta, Fulton County, neighborhood. These dogs had either escaped from their residences, or had no residences at all, and were roaming loose and free. These dangerous and vicious dogs roamed the streets and posed a threat to the residents and community.

25.

Prior to January 17, 2017, these dangerous and vicious dogs roaming free in this Southwest Atlanta neighborhood created a dangerous situation and ongoing nuisance for the residents of Logan's neighborhood. Prior to January 17, 2017, other residents and community members had been attacked by these dogs roaming free. Prior to January 17, 2017, property had been damaged by these dogs roaming free in Logan's neighborhood. Prior to January 17, 2017, other animals had been injured by these dogs roaming free in Logan's neighborhood.

26.

Prior to January 17, 2017, residents of Fulton County and Logan's Southwest Atlanta neighborhood repeatedly telephoned Fulton County Animal Control, controlled, managed, and run by LifeLine, in order to report this nuisance and the existence of

dangerous and vicious dogs roaming their streets. These neighbors called because they were afraid for their safety, concerned about the threats posed to their neighborhood, and impacted by the ongoing nuisance of dangerous dogs roaming free. These neighbors called Fulton County Animal Services based on instructions provided to them at <http://www.fultonanimalservices.com/field-enforcement> for assistance with Loose Animals.

27.

Prior to January 17, 2017, residents of Logan's Southwest Atlanta neighborhood also reported this nuisance and the existence of dangerous and vicious dogs roaming loose and free to Fulton County Animal Services via other modalities, such as e-mail, social media, and a Fulton2Go app.

28.

LifeLine, by and through its officers, agents, and employees, including, but not limited to its Enforcement Supervisors, Animal Control Officers, ASO's, and Dispatchers, knew or should have known of the nuisance and continuing problem of dangerous and vicious dogs roaming loose on the streets of Logan's Southwest Atlanta neighborhood.

29.

LifeLine, by and through its officers, agents, and employees, including, but not limited to its Enforcement Supervisors, Animal Control Officers, ASO's, and Dispatchers, knew or should have known that the continuing problem of dangerous and vicious dogs roaming the streets of Logan's Southwest Atlanta neighborhood could lead to a dog attacking a resident of this neighborhood.

E. LIFELINE'S LACK OF RESPONSE TO THE PRE-EXISTING PROBLEM OF UNCONTROLLED AND ROAMING DANGEROUS DOGS

30.

Despite the knowledge set forth above, LifeLine failed to take reasonable steps to uphold their duties to take reasonable measures to keep Logan's Southwest Atlanta neighborhood safe and free of roaming dangerous and vicious dogs. LifeLine failed to properly respond to the notices provided to them by the citizens of Fulton County, generally, and in Logan's Southwest Atlanta neighborhood, specifically. LifeLine failed to carry out the terms of its Contract with Fulton County and breached duties to Logan Braatz, resulting in foreseeable harm.

31.

Therefore, based on all of the foregoing facts, Defendant LifeLine is liable to Plaintiff for all damages recoverable including but not limited to: all compensatory, special, economic, consequential, general, punitive, and all other damages permissible under Georgia Law.

COUNT I – COMMON LAW NEGLIGENCE OF LIFELINE

32.

Plaintiff realleges and incorporates herein the allegations contained in the prior paragraphs as if fully restated.

33.

At all times pertinent herein, LifeLine was responsible for Animal Control Services in Fulton County and the Southwest Atlanta neighborhood where Logan was killed.

34.

At all times pertinent herein, LifeLine undertook a duty to provide Animal Control Services to the residents and citizens of Fulton County and to provide enforcement of the local Ordinances related to Animal Control as outlined in the Contract.

35.

At all times pertinent herein, LifeLine undertook a duty to provide ASO's to respond to requests for service called into the dispatcher at the Animal Control Center by members of the public for the benefit of the citizens of Fulton County.

36.

At all times pertinent herein, LifeLine undertook a duty to patrol Fulton County including the Southwest Atlanta neighborhood where Logan was killed, in a scheduled and systematic way, and to impound stray dogs that were subject to impoundment.

37.

At all times pertinent herein, LifeLine undertook a duty to enforce the regulations governing dangerous and loose animals and to enforce the Fulton County Animal Control Ordinances for the benefit and safety of the citizens of Fulton County.

38.

At all times pertinent herein, LifeLine undertook a duty to protect the citizens of Fulton County, such as Logan, from domestic animal problems in their neighborhood.

39.

At all times pertinent herein, LifeLine undertook a duty to maintain the capability to receive calls from the public on a twenty-four (24) hours, seven (7) days per week basis and accept and record requests for service.

40.

At all times pertinent herein, LifeLine undertook a duty to provide an answering service or other method to respond to emergency calls twenty-four (24) hours, seven (7) days per week.

41.

At all times pertinent herein, LifeLine undertook a duty to dispatch ASO's to handle requests for service in a timely manner.

42.

At all times pertinent herein, LifeLine undertook a duty to employ a certain amount of designated personnel to properly carry out the Contract's stated Scope of Work for the benefit of, and safety of, the citizens of Fulton County.

43.

Among other ways, LifeLine was negligent in carrying out the above duties by:

- (a) failing to answer calls or otherwise not responding to requests for service from the public calling to report dangerous conditions created by loose dogs who were roaming free on the streets of Fulton County, and specifically the Southwest Atlanta neighborhood where Logan was attacked and killed;
- (b) failing to appropriately and timely respond to service calls from certain zip codes and neighborhoods on the 'South Side of Atlanta', including in the Southwest Atlanta neighborhood where Logan was attacked and killed;
- (c) improperly allocating their efforts, resources, and attention in favor of the north side of Fulton County, to the detriment of the citizens of the south side of Fulton County, like Logan;
- (d) not properly patrolling the streets of Fulton County, specifically the Southwest Atlanta neighborhood where Logan was attacked and killed;
- (e) not having properly working answering services or other methods to respond to calls from the public seeking to report dangerous conditions created by loose dogs roaming the streets of Fulton County, and specifically the Southwest Atlanta neighborhood where Logan was attacked and killed;
- (f) not timely returning, or not returning at all, voice messages from calls from the public reporting dangerous conditions created by loose dogs roaming the streets of Fulton County, and specifically the Southwest Atlanta neighborhood where Logan was attacked and killed;
- (g) not having consistent policies for handling after hours service calls;
- (h) not enforcing any policies for handling after hour service calls;
- (i) not timely sending ASO's to respond to service calls within the time periods mandated by the Contract; and,

(j) not demonstrating to Fulton County residents that LifeLine would properly respond to calls from concerned residents and not properly demonstrating that LifeLine had the ability to carry out Animal Control as required by the Contract, which in turn created an environment where citizens of Fulton County, specifically in the Southwest Atlanta neighborhood where Logan was attacked and killed, felt that calling LifeLine to report dangerous, loose, and roaming dogs was a useless endeavor.

44.

LifeLine was negligent in carrying out the duties outlined in the Contract and breached their duties to Plaintiff and Logan by failing to exercise that degree of care which would be exercised by an ordinarily prudent person under the same or similar circumstances, pursuant to O.C.G.A. §51-1-2; by failing to exercise ordinary care, failing to provide proper Animal Control services around Fulton County and the Southwest Atlanta neighborhood where Logan was killed; and, by failing to take reasonable measures to protect the citizens of Fulton County as mandated by their Contract.

45.

Prior to January 17, 2017, Defendant LifeLine negligently serviced and provided Animal Control to the Southwest Atlanta neighborhood where Logan was killed. Prior to January 17, 2017, LifeLine ignored or otherwise failed to respond to reports of dangerous and vicious dogs roaming loose and free as reported (or as attempted to be reported) to them by Fulton County citizens. LifeLine had knowledge, both actual and constructive, of the need to better maintain, respond, service, secure, inspect, patrol and manage this Southwest Atlanta neighborhood, but failed to do so.

46.

LifeLine had actual and constructive knowledge of the recurring problems with dangerous and vicious dogs roaming the streets loose in the Southwest Atlanta neighborhood where Logan was killed prior to this attack on him.

47.

LifeLine had actual and constructive knowledge of the recurring problems with dangerous and vicious dogs roaming the streets in the Southwest Atlanta neighborhood where Logan was killed prior to this attack on him, but failed to warn, educate, and protect Fulton County citizens.

48.

As a proximate and foreseeable result of the negligence of LifeLine, Logan was killed. Therefore, Plaintiff seeks all compensatory, special, economic, consequential, general, punitive, and all other damages permissible under Georgia Law.

COUNT II – VICARIOUS LIABILITY OF LIFELINE

49.

Plaintiff realleges and incorporates herein the allegations contained in the prior paragraphs above as if fully restated.

50.

At all times relevant to this action, the managers, assistant managers, agents, and employees, including but not limited to Enforcement Supervisors, Animal Control Officer's, ASO's and Dispatchers of LifeLine, and those legally obligated to carry out the Contract's Scope of Work and specifically take reasonable steps to secure, respond,

monitor and patrol the Southwest Atlanta neighborhood where Logan was killed, were acting within the course and scope of their employment.

51.

At all times relevant to this action, the managers, assistant managers, agents, and employees, including but not limited to Enforcement Supervisors, Animal Control Officer's, ASO's and Dispatchers of LifeLine, and those legally obligated to take carry out the Contract's Scope of Work and specifically take reasonable steps to secure, respond, monitor and patrol the Southwest Atlanta neighborhood where Logan was killed, failed to properly carry out their duties and Scope of Work as outlined in the Contract.

52.

Therefore, LifeLine is responsible for the negligence of the employees and agents under the doctrine of *respondeat superior*, agency, or apparent agency.

COUNT III – NEGLIGENT HIRING, TRAINING, AND SUPERVISION

53.

Plaintiff realleges and incorporate herein the allegations contained in the prior paragraphs above as if fully restated.

54.

LifeLine was negligent in hiring managers, assistant managers, agents, and employees, including but not limited to Enforcement Supervisors, Animal Control Officers and Dispatchers (hereinafter 'employees') and entrusting them to carry out the terms of the Contract.

55.

Section 13.14.4 of Exhibit C of the Contract, entitled 'Training,' emphasizes the need for, and outlines the types of, staff training plans that LifeLine must provide and develop in order to properly carry out the Contract's stated Scope of Work.

56.

LifeLine was negligent in general with respect to hiring, training, and supervising its employees and also negligent in particular with respect to carrying out Section 13.14.4 of Exhibit C of the Contract.

57.

LifeLine was negligent in failing to properly train its employees.

58.

LifeLine was negligent in failing to properly supervise its employees.

59.

LifeLine's negligence in hiring its employees and entrusting them to carrying out the terms of the Contract and failing to train and supervise them properly, was a proximate cause of the attack on Logan and his death.

COUNT IV – NUISANCE

60.

Plaintiff realleges and incorporates herein the allegations contained in the prior paragraphs as if fully restated.

61.

LifeLine was in sole control of Animal Control Services in Fulton County and was to provide these services to Fulton County citizens like Logan. LifeLine was in sole control of, and had sole responsibility for, responding to service calls and patrolling Fulton County neighborhoods for the purpose of providing proper animal services. LifeLine undertook a duty to keep the citizens of Fulton County safe from loose and dangerous dogs and was in sole control of the manners and methods of preventing any ongoing and continuous problems with dangerous dogs in Fulton County, generally and in Logan's Southwest Atlanta neighborhood, specifically.

62.

In the years leading up to this attack on Logan, there was a regular, repeated, and ongoing problem of dangerous and loose dogs roaming free in the Southwest Atlanta neighborhood where Logan was attacked. LifeLine knew of this problem, was in control of the modalities to prevent it, and was paid by Fulton County to do so. However, LifeLine failed to take reasonable steps to remedy, ameliorate, or solve the ongoing nuisance of dangerous roaming dogs in and around Logan's Fulton County neighborhood.

63.

LifeLine's failure to take reasonable steps in response to the ongoing problem of dangerous dogs roaming free in the Southwest Atlanta neighborhood where Logan was attacked was a proximate cause of the attack.

64.

LifeLine's continued allowance of, and continued refusal to respond to or otherwise try to prevent, dangerous and vicious dogs roaming in Logan's Southwest

Atlanta neighborhood, constituted and constitutes a public and/or private nuisance within the meaning of O.C.G.A. §41-1-1 et seq., for which LifeLine is liable to Plaintiff.

65.

Logan was specifically injured by this nuisance allowed to remain in existence by LifeLine. Thus, Plaintiff has the right to proceed in her own name for this cause of action.

COUNT V – BREACH OF CONTRACT

66.

Plaintiff realleges and incorporates herein the allegations contained in the prior paragraphs as if fully restated.

67.

On or around March 15, 2013, LifeLine entered into a Contract with Fulton County to provide County Animal Services. This Contract included renewal terms and was in effect on January 17, 2017. This Contract had been in effect for nearly four years at the time of the attack on Logan. This Contract outlined payments due from Fulton County to LifeLine as consideration for the Animal Control Services that LifeLine was to perform. Payment for the Contract came from taxpayer funds and from the citizens of Fulton County like Logan's family.

68.

It is apparent from the language of the Contract that LifeLine and Fulton County intended to confer a direct benefit on all citizens of Fulton County, including Logan, for proper Animal Control Services that would include reasonable measures to protect them from the dangers posed by roaming and uncontrolled dogs.

69.

As a citizen of Fulton County, Logan was an intended third-party beneficiary of this Contract.

70.

LifeLine breached their duties under this Contract by failing to properly carry out its terms. LifeLine's breach was a proximate cause of Logan's death.

71.

As an injured party and as a third-party beneficiary under the Contract, Plaintiff may recover for LifeLine's failures, outlined above, which resulted in Logan's personal injuries and wrongful death.

COUNT VI – DAMAGES

72.

Plaintiff realleges and incorporates herein the allegations contained in the prior paragraphs as if fully restated.

73.

As a result of LifeLine's negligence, their breach of Contract, and the nuisance which they created, Logan suffered significant injuries and death.

74.

As a result of LifeLine's negligence, their breach of Contract, and the nuisance which they created, Plaintiff Angelica, as Administrator of the Estate of Logan Braatz, has a claim for, and seeks to recover for, Logan's medical expenses, funeral expenses, conscious pain and suffering, and punitive damages.

75.

As a result of LifeLine's negligence, their breach of Contract, and the nuisance which they created, Plaintiff Angelica Braatz, as Surviving Mother of Logan Braatz, has a claim for, and seeks to recover for, the full value of the life of Logan Braatz.

COUNT VII – PUNITIVE DAMAGES

76.

Plaintiff realleges and incorporates herein the allegations contained in the paragraphs above as if fully restated.

77.

LifeLine's conduct, as set forth in Counts I-V, above, was reckless and demonstrates a conscious indifference to the consequences of their actions. Accordingly, Plaintiff Angelica Braatz, as Administrator of the Estate of Logan Braatz, is entitled to punitive damages.

WHEREFORE, Plaintiff prays that they have a trial by jury on all issues so triable and judgment against LifeLine as follows:

- a. That Plaintiff Angelica Braatz, as Administrator of the Estate of Logan Braatz, recovers for Logan Braatz's medical expenses and funeral expenses in an amount to be proven at trial;
- b. That Plaintiff Angelica Braatz, as Administrator of the Estate of Logan Braatz, recovers for Logan Braatz's mental and physical pain and suffering in an amount to be determined by the enlightened conscience of a jury;

- c. That Plaintiff Angelica Braatz, as Administrator of the Estate of Logan Braatz, recovers punitive damages in an amount to be determined by the enlightened conscience of a jury;
- d. That Plaintiff Angelica Braatz, as Surviving Mother of Logan Braatz, recovers for the full value of the life of Logan Braatz in an amount to be determined by the enlightened conscience of a jury; and,
- e. That Plaintiffs recover such other and further relief as is just and proper.

This 19th Day of December, 2017.

Law Offices of Andrew E. Goldner, LLC

/s/ Andrew E. Goldner

Andrew E. Goldner
Georgia State Bar No. 297329

/s/ Joshua S. Stein

Joshua S. Stein
Georgia State Bar No. 141925

1050 Crown Pointe Parkway
Suite 340
Atlanta, GA 30338
(404)869-1580 Office
(404)393-1099 Fax
Andy@goldnerlegal.com
Josh@goldnerlegal.com

Attorneys for Plaintiff

STATE COURT OF
DEKALB COUNTY, GA.
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E-FILED
BY: Monica Gay