

3. The amount in controversy in this action exceeds \$75,000.00; thus, this Court has jurisdiction of this action pursuant to 28 U.S.C. § 1332 based on diversity.

4. This District is the proper venue for this action pursuant to 28 U.S.C. §§ 1391 (a) and (b), as Jefferson County, Kentucky is the place in the United States of America where this claim arose.

STATEMENT OF FACTS

5. Plaintiff has been in the business of conducting education conferences at various colleges in the University of Oxford since 1989. Those who have attended such conferences are primarily professors, but others who have attended include former ambassadors, ministers of education, diplomats, college presidents, governors and elected officials, judges, business leaders, scientists, attorneys and physicians.
6. Upon information and belief, Defendant is a lecturer affiliated with the Wellcome Unit at the University of Oxford. Defendant has no relationship with the Plaintiff.

Defendant's Contact with Round Table Participants

7. In early 2007, Defendant, sent an unsolicited e-mail to an invitee of the Plaintiff, Dr. Anne George, who contracted with Plaintiff to attend one of the Round Table conferences. A copy of the e-mail from Dr. Sloan Mahone to Dr. Anne George is attached hereto as **Exhibit A**.
8. In the same unsolicited e-mail, Defendant states that the Oxford Round Table is a "complete fraud" and should be "shut down."
9. In the same unsolicited e-mail, Defendant warns Dr. George of a "danger" in participating in the Oxford Round Table.
10. In the same unsolicited e-mail, Defendant states that the Plaintiff is "a tourist venture, not a prestigious academic event."

11. In the same unsolicited e-mail, Defendant states that the Plaintiff “charges an outrageous \$3,000 fee plus expenses.”
12. In the same unsolicited e-mail, Defendant states that she sent the e-mail “out of the blue”.
13. In the same unsolicited e-mail, Defendant states that she had conducted a “basic web search on the Oxford Round Table” to find the names of participants who had contracted with Plaintiff to attend an Oxford Round Table, Inc. session.
14. In the same unsolicited e-mail, Defendant states that she has been engaged in a broader Internet campaign to disparage the Oxford Round Table, Inc. on a forum located at <http://chronicle.com/forums/index.php?topic=30869.msg417974> (hereinafter the “Chronicle Forum”).

Defendant’s Internet Campaign

15. Between December 2006 and May 2007, Defendant, going by the name of “ukprof,” has been engaged in an Internet campaign on the Chronicle Forum. A Copy of Defendant’s Chronicle Forum correspondence is attached hereto as **Exhibit B**.
16. The Chronicle Forum website accesses a primary audience that the Plaintiff’s business serves and upon which Plaintiff depends for participation at the conferences.
17. On or about December 13, 2006, Defendant posted a message on the Chronicle Forum asserting that the Plaintiff’s business of holding educational conferences was “a scam”.

18. On or about December 14, 2006, Defendant posted a message on the Chronicle Forum stating that it would be “a disaster” for a professor seeking tenure to include participation in Plaintiff’s conference in his/her portfolio.
19. On or about December 18, 2006, Defendant posted a message on the Chronicle Forum stating that “one would hope” that Plaintiff’s “misrepresentation as a prestigious academic conference is nearing an end.”

Defendant’s Contact with the Oxford Colleges

20. In 2006, Defendant, unsolicited and without invitation, contacted the “Principal of one of the (Oxford) Colleges” (Harris Manchester College) with whom Plaintiff has an agreement and a special working relationship to disparage the Plaintiff’s business and to interfere with the contract between said college and the Plaintiff.
21. Following Defendant’s unsolicited e-mails and blogging campaign, Plaintiff experienced a substantial decline in enrollment and revenue at the spring 2007 sessions of the Oxford Round Table, Inc.
22. Participation during the said sessions, compared to the previous two years, declined 40%.
23. Gross revenues for the said sessions were down substantially, compared to the previous two years.
24. On or about March 23, 2007, Plaintiff sent a letter to Defendant demanding that the Defendant cease and desist interfering with Plaintiff’s business. A copy of the letter dated March 23, 2007 is attached hereto as **Exhibit C**.
25. On or about May 7, 2007, Defendant continued her Internet campaign to disparage the Plaintiff’s business on the Chronicle Forum. See Ex. B.

26. In a message posted on the Chronicle Forum dated May 7, 2007, Defendant asserts that she plans to continue her campaign of defamation against the Plaintiff.

The e-mail states as follows:

“word of warning...I posted earlier on the Oxford Roundtable and have referred to this as a tourist venture and not a 'prestigious Oxford event' and the Roundtable is now threatening me with a lawsuit for defamation. Honestly, I had lost interest, but I suppose this changes things.”

CAUSES OF ACTION

Count I

Tortious Interference with Existing Contractual Relationships

27. Plaintiff hereby incorporates by reference the averments contained in Paragraphs 1 through 26 of this Complaint.
28. In early 2007, Defendant, in an unsolicited e-mail to an invitee of the Plaintiff, Dr. Anne George, who contracted with Plaintiff to attend one of the Round Table conferences, intentionally, knowingly and “out of the blue” set out to “shut down” the Plaintiff’s business by stating that it was a “complete fraud” and a “danger” to attend.
29. In that same e-mail, Defendant admitted that as part of her effort to “shut down” the Plaintiff’s business, she had conducted a “basic web search on the Oxford Round Table” to find the names of participants who had contracted with Plaintiff to attend an Oxford Round Table, Inc. session.
30. Defendant, in the same unsolicited e-mail, stated that she has been engaged in a broader Internet campaign on the *Chronicle of Higher Education’s* website, located at <http://chronicle.com/forums/index.php?topic=30869.msg417974>, to disparage the Oxford Round Table, Inc.

31. Defendant intentionally and with malice conveyed false and defamatory information to a contracting participant of the Plaintiff and a broader audience upon which the Plaintiff's business depends.
32. Defendant furthermore contacted the Principal of Harris Manchester College in the University of Oxford to disparage the Plaintiff's business and to interfere with the contractual relationship between said college and the Plaintiff.
33. Defendant's false and defamatory statements constituted a deliberate and malicious scheme to harm Plaintiff's good standing and its reputation in the academic community.
34. Defendant's intentional interference has harmed Plaintiff's reputation with both contracting participants and with individual colleges in the University of Oxford with which contracts are essential to the viability of Plaintiff's business.
35. Defendant intentionally interfered with Plaintiff's agreements and contracts without justification and invaded its business relations by engaging in significantly wrongful conduct via e-mail and the Internet.
36. As a direct and proximate result of Defendant's unsolicited e-mail and Internet activities, Plaintiff experienced a substantial decline in enrollment at Plaintiff's conference sessions.
37. As a direct and proximate result of Defendant's unsolicited e-mail and admitted Internet postings, Plaintiff experienced a substantial decline in revenue at Plaintiff's conference sessions.
38. Notwithstanding its receipt of a cease and desist letter from Plaintiff, Defendant continues to disparage Plaintiff's reputation on the Chronicle Forum.

Count II
Tortious Interference with a Prospective Contractual Advantage

39. Plaintiff hereby incorporates by reference the averments contained in Paragraphs 1 through 38 of this Complaint.
40. In early 2007, Defendant, in an unsolicited e-mail to an invitee of the Plaintiff, Dr. Anne George, who contracted with Plaintiff to attend one of the Round Table conferences, intentionally, knowingly and “out of the blue” set out to “shut down” the Plaintiff’s business by stating that it was a “complete fraud” and a “danger” to attend.
41. Defendant also has been engaged in a broader Internet campaign to disparage the Plaintiff’s business on the *Chronicle of Higher Education’s* website, <http://chronicle.com/forums/index.php?topic=30869.msg417974>.
42. The Internet campaign consists of several e-mails and postings written by Defendant between December 2006 and May 2007 disparaging the Oxford Round Table, Inc.
43. Defendant furthermore contacted the Principal of Harris Manchester College in the University of Oxford to disparage the Plaintiff’s business and to interfere with the agreement and special relationship between said college and the Plaintiff.
44. Defendant, with malice, interfered with the business of the Plaintiff with the intent to “shut down” Plaintiff’s business.
45. Defendant damaged Plaintiff’s business interest and interfered with its prospective business advantage by maliciously communicating false and libelous information about Plaintiff’s business.

46. Defendant had no relationship with the Plaintiff nor with the Plaintiff's contractual relationships and had no legitimate reason to interfere with and harm the Plaintiff's prospective business interests.
47. As clearly evidenced by the train of e-mails between December 2006 and May 2007, the Defendant acted in "bad faith" and with an "improper purpose".
48. The proximity of the Defendant's conduct was direct and constituted immediate injurious effect on the business prospects and relationships of the Plaintiff.

Count III - Defamation

49. Plaintiff hereby incorporates by reference the averments contained in Paragraph 1 through 48 of this Complaint.
50. Defendant made false and libelous statements regarding the Plaintiff to a third party in an e-mail communication.
51. Defendant's libelous e-mail informed a third party that the Plaintiff's business was a "fraud" and "a danger" and should be "shut down".
52. Defendant also made false and libelous statements to hundreds, perhaps thousands, of visitors to the *Chronicle of Higher Education's* website, a primary audience that the Plaintiff's business serves and upon which it depends for participation.
53. Defendant, unsolicited and without invitation, contacted the Principal of Harris Manchester College in the University of Oxford, with whom Plaintiff has an agreement and a special contractual relationship, to disparage the Plaintiff's business and to interfere with the contract between said college and the Plaintiff.

54. Defendant's false and libelous statements were intentional and were calculated to cause harm and disrepute to the Plaintiff.

55. Defendant's false and libelous statements have harmed Plaintiff's reputation, denigrated its integrity, and caused a material reduction in participation and revenues.

WHEREFORE, Plaintiff sues the Defendant for monetary damages in an amount to be determined at trial in excess of the jurisdictional threshold of \$75,000.00, plus pre-judgment interest and court costs.

PRAYER FOR RELIEF

PREMISES CONSIDERED, Plaintiff prays:

- A. That proper process issued and be served upon the Defendant requiring the Defendant to answer this Complaint within the time and in the manner required by law;
- B. That upon the hearing of this cause, this Court grant Plaintiff a judgment against Defendant in an amount to be determined at trial in excess of the jurisdictional threshold of \$75,000.00, plus pre-judgment interest and court costs;
- C. That upon the hearing of this cause, this Court grant Plaintiff injunctive relief, enjoining Defendant from commenting by any media regarding the Oxford Round Table, Inc. henceforth and forever;
- D. That upon the hearing of this cause, this Court grant Plaintiff pre-judgment and post-judgment interest and court costs;
- E. There is no just reason for delay in the entry of an Order for Judgment, Judgment, and Decree, or in the issuance of any execution by the Court in furtherance of Plaintiff's Complaint, herein, and such execution and other relief as the Court may deem just and

equitable should be issued immediately upon entry by the Court of an Order for Judgment, Judgment, and Decree;

- F. That this Court grant Plaintiff such other and further legal and equitable relief to which it deems the Plaintiff is entitled;

Dated this the 25th day of June, 2007.

Respectfully submitted,

/s/ James C. Bradshaw III
James C. Bradshaw III (#85633)
Klint W. Alexander (#88343)
WYATT, TARRANT & COMBS, LLP
2525 West End Avenue, Suite 1500
Nashville, Tennessee 37203
(615) 244-0020
Counsel for Plaintiff
Oxford Round Table, Inc.

Dear Andy,

attachment[1]

Thank you for your email. I really enjoyed our conversation at dinner. I am really glad I mentioned this to you. I am forwarding you the email I got from Dr. Mahone. Please let me know how this pans out.

Anne

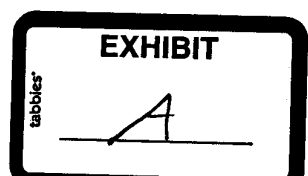
Dear Dr George,
Please pardon this email out of the blue. Your university's recent press release came up when I was doing a basic web search on the Oxford Roundtable. I was wondering if you are aware that the Oxford Roundtable is not, in any way, affiliated with the University of Oxford, other than renting rooms when the University is out of session. This is a tourist venture, not a prestigious academic event. The group sends mass mailings several times a year (not 'invitations') and charges an outrageous \$3000 fee plus expenses. Prompted by a number of US based colleagues who have received these mailings, there is now some impetus underway to force the Roundtable to be much more upfront in their advertisements...one danger being, of course, that junior academics might include a paper given at 'Oxford University' within their tenure portfolio. A recent thread in the forums of the Chronicle of Higher Education also remark upon this event as a scam.
<http://chronicle.com/forums/index.php?topic=30869.msg417974>

Personally, I believe the group ought to be shut down as a complete fraud. I'm sorry if this news is unwelcome.

Kind regards,
Sloan Mahone

--

Dr. Sloan Mahone
University Lecturer in the History of Medicine
Acting Director, Wellcome Unit for the History of Medicine
Oxford University



ukprof

New member



Posts: 5



Re: Oxford Round Table

« Reply #9 on: December 13, 2006, 08:09:46 AM »

I'm really glad to see someone has posted on this.



I teach at Oxford and was recently contacted by two colleagues from the US who were 'invited speakers' for the Oxford Roundtable and wanted to know about its history, quality, etc. After some checking, it became clear that this is essentially a tourist group that rents space from the University when classes are out of term. The pricetag to attend is about \$4000 total. I don't know what their written materials look like, but their website does indeed make it look like this is an Oxford University sponsored conference. If you look harder, there is a link to a disclaimer which means they can't be sanctioned legally (I suppose) but in my view they are clearly misleading people, and yes, I would call it a scam.

ukprof

New member



Posts: 5



Re: Oxford Round Table

« Reply #12 on: December 14, 2006, 04:01:22 AM »



To be fair, I don't think the University knows much about this, and doubt they have reviewed the materials being sent out. The colleges rent their facilities during breaks, and I imagine this group looked like any other. After looking at some of the various academic press releases online (from participants' universities) it does appear that people genuinely believe they have been invited by Oxford University and this makes me wonder if some have included this in their tenure portfolio. That could be a disaster.

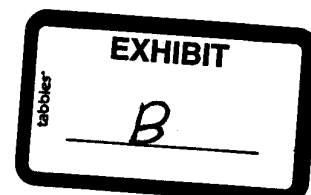
ukprof


New member



Re: Oxford Round Table

« Reply #16 on: December 18, 2006, 10:24:14 AM »



Posts: 5  There is something the University can do, and it would appear that this is in the works. I have heard back from the Principal of one of the Colleges the group uses and he has contacted the Roundtable to tell them to amend their website (beyond the vague disclaimer) and has appointed a small committee to look at this in-house. Obviously, the group can use 'Oxford' as a name, in that they run a tourist conference in the city of Oxford, but one would hope that their misrepresentation as a prestigious academic conference is nearing an end.

ukprof


New member

Posts: 5

Re: Oxford Round Table

« Reply #54 on: Today at 05:28:17 AM »

5/8/07

 word of warning...I posted earlier on the Oxford Roundtable and have referred to this as a tourist venture and not a 'prestigious Oxford event' and the Roundtable is now threatening me with a lawsuit for defamation. Honestly, I had lost interest, but I suppose this changes things. Interestingly, they have changed their website to state 'with offices at' Harris Manchester College, although I'm not sure what real difference that makes.

Shenette McCandless
Coordinator
Oxford Round Table, Inc.
150 East Pacific Coast Highway,
Suite 200, Long Beach CA 90804
Phone: (562) 346-3261
Fax: (562) 346-3215
shenette@oxfordroundtable.com

March 23, 2007

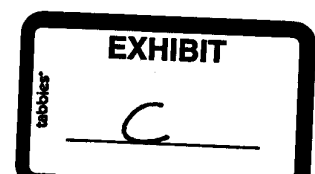
Dr. Sloan Mahone
University Lecturer in History of Medicine
Acting Director, Wellcome Unit for the History of Medicine
Oxford University
45-47 Banbury Road
Oxford OX 26 PE
sloan.mahone@wuhmo.ox.ac.uk

Dear Dr. Mahone:

We have in hand a copy of an email in which you defamed the Oxford Round Table, Inc. and interfered with its contractual obligations. The Oxford Round Table, Inc. is a corporation of the United States.

Your email indicates that you conducted "basic web research on the Oxford Round Table" to identify persons who had been invited to the Oxford Round Table, Inc., and then of your own volition, with malice, interceded with these invited persons to inform them that "the group (Oxford Round Table) should be shut down as a complete fraud." We understand that you have not only perpetrated this unlawful undertaking, but, that, in addition, you are also responsible for a string of blogs that likewise libel the Oxford Round Table, Inc.

The Oxford Round Table, Inc. has conducted conferences in Oxford Colleges for eighteen years and has had longstanding contractual agreements with several Oxford colleges that have been mutual, beneficial and cordial in every respect. As you may know, these colleges are also



chartered educational corporations with the statutory authority to make contracts and promulgate agreements with other corporate entities. You are a third party with no interest, whatsoever, in these contracts and agreements.

Not only do you have no legal attachment to the Oxford Round Table, Inc., or in any of its contracts with Oxford colleges, you are devoid of knowledge regarding the purposes for which the entity exists. The Oxford Round Table, Inc. was chartered as a "marketplace of ideas" wherein academics, governmental and business leaders could exchange ideas regarding public education policy. I am sure that in your campaign to destroy the Round Table that you have not taken the trouble to discover that Roy Jenkins, now deceased, but then Chancellor of the University, advised us and helped us launch the Round Table initially and was the keynote speaker at one of our first sessions. Nor have you found it necessary to learn that earlier Vice Chancellor Southwood was very helpful in our beginning years and that Vice-Chancellor North and other leaders of the University community have been very considerate in contributing to the success of Round Table sessions. If you had been interested in truth and facts about the Round Table you would have been aware that Sir Anthony Kenny and other faculty members of the University have attended our sessions and have served as primary presenters. Further, if you had been concerned about truth and facts, rather than calumny, you could have easily found that Michael Beloff, Q.C., President of Trinity College (retired) and Sir Christopher Ball, formerly head of Keble, had contributed to Round Table publications. In short, your scurrilous attacks that have materially harmed the reputation, economic interests, and viability of the Round Table have been undertaken without fact, truth or foundation.

We have consulted legal counsel, in the U.K. and in the U.S., and it is our understanding that you, personally, may be liable in damages to the Oxford Round Table, Inc., and, perhaps, to college entities, as contracting parties, in at least the following ways.

First. Each of your conveyances of defamatory information by itself is a separate tort offense. The internet constitutes publication and every repetition is a fresh publication that gives rise to a separate cause of action against you, as defendant. See: *Truth (NZ) Ltd. v. P.N. Holloway* (1960) 1 WLR 997. The internet service provider that you have misused may also, be liable for

damages. See: *Godfrey v. Demon Internet* (1999) 4 All ER 342. Venue for litigation is in both or either the U.K. and/or the U.S.

Second. Your conveyance of the allegations regarding the Oxford Round Table, Inc. constitutes malicious defamation calculated to harm the economic well-being of the Oxford Round Table, Inc., as a corporate being. You clearly state your harmful intent "the group ought to be shut down...". Your defamation is therefore, "intentional," and with malice, and results in dire economic consequences for the Oxford Round Table, Inc.

Third. Your unsolicited statement that the Oxford Round Table is "a complete fraud" is grounds for a separate action against you by the Oxford Round Table, Inc. You allege thereby that the Oxford Round Table, Inc. is guilty of the crime of fraud. Your published allegation is false and absurd and itself constitutes "unlawful means" to harm the corporation. This is a basis for an action in the "tort of interference" against you, personally, and probably the Wellcome Trust which funds you, and, possibly, St. Catherine's College, Oxford, for which you are an agent. See: *Lonrho plc v. Rayed*, (1990) 2 QB 479 (CA); (1992) 1 AC 448 (HL).

Fourth. Your unsolicited intervention into a matter involving contracts between the Oxford Round Table, Inc. and several Oxford colleges, as legal entities, is calculated to harm and to induce a breach of a business contract, or contracts. Your inducement of a breach is grounds for a substantial damage claim. Therefore, your defamatory publication to invitees of the Oxford Round Table, Inc., wherein you seek to ruin ("shut down") the ability of the corporate entity to fulfill its obligations to the Oxford colleges, constitutes "inducement" by "unlawful means" to harm contractual obligations.

Finally, we are further informed by legal counsel that you can still mitigate the extent of your liability and, possibly, reduce your monetary damages (See: Section 1, Libel Act 1843, as amended by Libel Acts of 1845 and 1879) if you publish an apology. Such an apology must be conveyed by internet to all those persons to whom you have conveyed the false information. Of course, you must cease and desist from any further communication with anyone regarding the Oxford Round Table, Inc.

We will look forward to your immediate response. Time is of the essence in this matter.

Sincerely yours,

Shenette McCandless
Coordinator
Oxford Round Table, Inc.

UNITED STATES DISTRICT COURT

WESTERN

District of

KENTUCKY

OXFORD ROUND TABLE, INC.

SUMMONS IN A CIVIL ACTION

V.

SLOAN MAHONE

CASE NUMBER:

TO: (Name and address of Defendant)

Sloan Mahone
45-47 Banbury Road
Oxford, OX 26 PE
United Kingdom

YOU ARE HEREBY SUMMONED and required to serve on PLAINTIFF'S ATTORNEY (name and address)

James C. Bradshaw, III
Wyatt, Tarrant & Combs, LLP
2525 West End Avenue
Suite 1500
Nashville, TN 37203

an answer to the complaint which is served on you with this summons, within 20 days after service of this summons on you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. Any answer that you serve on the parties to this action must be filed with the Clerk of this Court within a reasonable period of time after service.

CLERK

DATE

(By) DEPUTY CLERK

RETURN OF SERVICE		
Service of the Summons and complaint was made by me ⁽¹⁾	DATE	
NAME OF SERVER (<i>PRINT</i>)	TITLE	
<i>Check one box below to indicate appropriate method of service</i>		
<div style="margin-bottom: 10px;"> <input type="checkbox"/> Served personally upon the defendant. Place where served: </div> <div style="margin-bottom: 10px;"> <input type="checkbox"/> Left copies thereof at the defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein. Name of person with whom the summons and complaint were left: </div> <div style="margin-bottom: 10px;"> <input type="checkbox"/> Returned unexecuted: </div> <div> <input type="checkbox"/> Other (specify): </div>		
STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL \$0.00
DECLARATION OF SERVER		
<p>I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 30%;"> Executed on _____ <div style="text-align: center; font-size: small;">Date</div> </div> <div style="width: 60%;"> _____ <div style="text-align: center; font-size: small;">Signature of Server</div> </div> </div> <div style="text-align: center; margin-top: 20px;"> _____ <div style="font-size: small;">Address of Server</div> </div>		

(1) As to who may serve a summons see Rule 4 of the Federal Rules of Civil Procedure.

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

OXFORD ROUND TABLE, INC.

(b) County of Residence of First Listed Plaintiff Jefferson
(EXCEPT IN U.S. PLAINTIFF CASES)(c) Attorney's (Firm Name, Address, and Telephone Number)
James C. Bradshaw, III (615) 244-0020
Wyatt, Tarrant & Combs, LLP
2525 West End Ave., Suite 1500, Nashville, TN 37203

DEFENDANTS

SLOAN MAHONE

County of Residence of First Listed Defendant Oxfordshire
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known) Nabarro
Lacon House, Theobald's Road
London, WC1X 8RW
United Kingdom

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☐ 3 Federal Question (U.S. Government Not a Party)
- ☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | | | | | |
|---|----------------------------|---------------------------------------|---|---------------------------------------|----------------------------|
| | PTF | DEF | | PTF | DEF |
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input checked="" type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input checked="" type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input checked="" type="checkbox"/> 360 Other Personal Injury PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition		

V. ORIGIN

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from another district (specify)
- ☐ 6 Multidistrict Litigation
- ☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

28 U.S.C. § 1332Brief description of cause: Defendant has tortiously interfered with the existing and prospective business relationships of Plaintiff and defamed Plaintiff's good name

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23DEMAND \$ over \$75,000

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

25 June 07

SIGNATURE OF ATTORNEY OF RECORD

James C. Bradshaw III

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____