

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE, WESTERN DIVISION

DEBORAH MARION, Individually and
as best friend of LORENZEN WRIGHT, JR.,
LOREN WRIGHT, LAMAR WRIGHT,
SHAMAR WRIGHT, SOPHIA WRIGHT,
and LAWSON WRIGHT and
HERBERT WRIGHT, Individually and
on behalf of the ESTATE OF LORENZEN
WRIGHT,

Plaintiffs,

vs.

Cause No. _____
Jury Demanded

CITY OF GERMANTOWN, TENNESSEE,
CITY OF COLLIERVILLE, TENNESSEE,
COUNTY OF SHELBY, TENNESSEE,
and other unnamed and unknown individuals.

Defendants.

COMPLAINT

Comes now the Plaintiff, DEBORAH MARION (Individually and as best friend of LORENZEN WRIGHT, JR., LOREN WRIGHT, LAMAR WRIGHT, SHAMAR WRIGHT, SOPHIA WRIGHT, and LAWSON WRIGHT), by and through her attorneys of record, Paul Forrest Craig, Daniel O. Lofton and Gerald S. Green, and Plaintiff, HERBERT WRIGHT (Individually and on behalf of the Estate of Lorenzen Wright), by and through their attorney of record, Ruby Wharton of the Wharton Law Firm and sues the Defendants, City of Germantown, Tennessee, City of Collierville, Tennessee, County of Shelby, Tennessee and other individuals

who are unknown and unnamed at this time, and for cause would show unto the Honorable Court as follows:

I.Parties

1. Deborah Marion is a resident of the County of Shelby, State of Tennessee and resides at 6579 Pine Top Circle S., Memphis, TN 38141.

2. Lorenzen Wright, Jr. is a resident of the County of Shelby, State of Tennessee and resides in Cordova, Tennessee.

3. Loren Wright is a resident of the County of Shelby, State of Tennessee and resides in Cordova, Tennessee.

4. Lamar Wright is a resident of the County of Shelby, State of Tennessee and resides in Cordova, Tennessee.

5. Shamar Wright is a resident of the County of Shelby, State of Tennessee and resides in Cordova, Tennessee.

6. Sophia Wright is a resident of the County of Shelby, State of Tennessee and resides in Cordova, Tennessee.

7. Lawson Wright is a resident of the County of Shelby, State of Tennessee and resides in Cordova, Tennessee.

8. Herbert Wright is a resident of Shelby County, Tennessee and resides at 3739 Prescott Road South, Memphis, Tennessee 38118. Further, he is the Executor of the Estate of Lorenzen Wright which was opened in the Probate Court of Shelby County, Tennessee on or about January 24, 2011.

9. The Defendant, City of Germantown, Tennessee is a municipality organized under the laws of the State of Tennessee and may be served with process through the Office of

the Mayor at 1930 Germantown Road South, Germantown, TN 38138.

10. The Defendant, City of Collierville, Tennessee is a municipality organized under the laws of the State of Tennessee and may be served with process through the Office of the Mayor at Town Hall, 500 Poplar View Parkway, Collierville, TN 38017.

11 That the Defendant, County of Shelby, Tennessee is a county government organized under the laws of the State of Tennessee and may be served with process through the Office of the Mayor at 160 North Main Street, Memphis, TN 38103.

12. That there is believed to be others who at the present time are unknown and unnamed individuals. The identity of these individuals is expected to be revealed throughout the course of this litigation and upon discovery. The Plaintiff will amend said complaint to include these individuals.

II. Jurisdiction

The jurisdiction of this Honorable Court of the matters complained of herein is predicated and founded upon violation of the Civil Rights Act (42 U.S.C. Sec. 1981 *et seq.*) for violations of rights under the United States Constitution, including but not limited to denial of due process rights under Amendment V and the denial of rights pursuant to the privileges and immunities clause, equal protection clause and due process clause of Amendment XIV.

Venue is proper in the fact that events which make up this cause of action occurred in and around Shelby County, Tennessee which is located in the Western District, Western Division of the State of Tennessee.

That the damages sought in the matter in controversy and to which the Plaintiffs believe they are entitled exceeds, exclusive of interest and costs, the sum specified by 28 U.S.C. 1332.

III. Jury Demand

The Plaintiffs demand a jury to try this cause when the issues are joined.

IV. Facts Common to All Claims

1. The City of Germantown, Tennessee is a municipality organized under the laws of the State of Tennessee located in Shelby County, Tennessee. And, as such provides a variety of services to the citizens and visitors of said municipality.

2. That one such service provided by said municipality includes but is not limited to the providing of a police force with the express purpose of providing protection to the citizens and visitors of said municipality.

3. The City of Collierville, Tennessee is a municipality organized under the laws of the State of Tennessee located in Shelby County, Tennessee. And, as such provides a variety of services to the citizens and visitors of said municipality.

4. That one such service provided by said municipality includes but is not limited to the providing of a police force with the express purpose of providing protection to the citizens and visitors of said municipality.

5. The County of Shelby, Tennessee is a county government organized under the laws of the State of Tennessee. And, as such provides a variety of services to the citizens and visitors of said county.

6. That one such service provided by said municipality includes but is not limited to the providing of a police force with the express purpose of providing protection to the citizens and visitors of said County.

7. That one of the police functions provided by Defendant City of Germantown is the operation of a 911 dispatch call center. And, that in undertaking the operation of a 911

dispatch call center, Defendant, City of Germantown, has taken on the duty and obligation to ensure that the 911 call center is staffed with dispatchers who are adequately trained to effectively and efficiently handle all manner of emergency calls in a prioritized fashion based on objective indicators of urgency.

8. Further, that in undertaking the operation of a 911 dispatch call center, Defendant City of Germantown has adopted policies and procedures for the proper handling of all manner of emergency calls.

9. That one of the police functions provided by Defendant City of Collierville is the operation of a police force whose services include, but are not limited to, the taking of and investigating of missing person reports. And, that in undertaking the service of investigating missing person reports, Defendant City of Collierville has taken on the duty and obligation to ensure that its police force is staffed with officers who are adequately trained to handle missing person reports in an effective and efficient manner based on objective indicators of urgency.

10. Further, in undertaking the operation of initiating, servicing, and investigating missing person reports, Defendant City of Collierville has adopted policies and procedures for the proper handling of missing person reports.

11. That one of the police functions provided by Defendant County of Shelby, Tennessee is to coordinate the police departments of the various municipalities located within its borders in such a manner that ensures that local police forces have properly trained and equipped their employees for the proper handling of both 911 calls and missing persons reports.

12. Further, Defendant County of Shelby, Tennessee has adopted policies and procedures to ensure that the police departments of the various municipalities will properly handle 911 calls and missing persons reports. Additionally, Defendant County of Shelby,

Tennessee has adopted policies and procedures to ensure that all of the police departments of the various municipalities will cooperate and share information in regards to 911 calls and missing person reports.

13. Lorenzen Wright was born on November 4, 1975. His mother was Deborah Marion. His father was Herbert Wright.

14. Lorenzen Wright played collegiate basketball for the University of Memphis.

15. In 1996, Lorenzen Wright was drafted in the first round of the National Basketball Association by the Los Angeles Clippers. He played in the National Basketball Association for thirteen seasons. The teams in which he played for included the Los Angeles Clippers, the Atlanta Hawks, the Sacramento Kings, the Cleveland Cavaliers and the Memphis Grizzlies. Lorenzen Wright played for the Memphis Grizzlies from 2001 until 2006.

16. At the time of his death, Lorenzen Wright left six children, namely: Lorenzen Wright, Jr. born April 13, 1995; Loren Wright born March 31, 1997; Lamar Wright born January 5, 2000; Shamar Wright born January 5, 2000; Sophia Wright born November 25, 2006; Lawson Wright born August 2, 2005.

17. Lorenzen Wright was divorced from his wife, Sherra Wright, on or about February 8, 2010 in the Circuit Court of Shelby County, Tennessee under Cause No. CT-002526-09.

18. After his divorce, Lorenzen Wright maintained a residence in Atlanta, Georgia.

19. On July 18, 2010, Lorenzen Wright left the home of his ex-wife, Sherra Wright in Collierville, Tennessee to return to his residence in Atlanta, Georgia.

20. Based upon information and belief, that some time during the early morning hours of July 19, 2010, Lorenzen Wright was the victim of some unknown crime which eventually led

to his untimely death.

21. Based upon information and belief, the unknown 911 call dispatch center for the City of Germantown received a phone call from Lorenzen Wright's cell phone in the early morning hours of July 19, 2011.

22. Based upon information and belief, the unknown 911 call dispatcher for the City of Germantown who received the call from Lorenzen Wright's cell phone heard a garbled expletive and as many as 10 gunshots.

23. Based upon information and belief, the unknown 911 call dispatcher for the City of Germantown who received this call attempted to recall this number; however, there was no answer to this return call.

24. Based upon information and belief, the unknown 911 call dispatcher for the City of Germantown took no further immediate action in regards to this call from the cell phone of Lorenzen Wright.

25. Based upon information and belief, the unknown 911 call dispatcher for the City of Germantown did not inform a supervisor of this call until eight (8) days had passed on or about, July 27, 2010.

26. Based upon information and belief, the actions of the unknown 911 call dispatcher for the City of Germantown were in accord with the policies and procedures for handling such calls as established by the City of Germantown.

27. Based upon information and belief, on July 19, 2011 when the 911 call was made from Lorenzen Wright's cell phone, Lorenzen Wright was still alive.

28. That the exact date and time of the death of Lorenzen Wright is unknown.

29. That the Order opening the Estate of Lorenzen Wright (Shelby County Probate

Court No. D-10669) establishes the date of Lorenzen Wright's death as July 28, 2010.

30. That beginning on July 19, 2010 and continuing until July 20, 2010, the Plaintiff Deborah Marion began to increasingly worry over the fact that she had not heard from her son, Lorenzen Wright. It was extremely out of character for her son not to be in contact with her on a daily basis.

31. Not having heard from her son for a period of almost 48 hours, Plaintiff Deborah Marion contacted the City of Collierville Police Department for the purpose of filing a missing person report concerning the disappearance of Lorenzen Wright.

32. That this missing person report was taken by Det. N. Young on or about July 20, 2010 on or about July 20, 2010.

33. Based upon information and belief, the City of Collierville Police Department did little more than take the missing person report from Plaintiff Deborah Marion; it failed to act promptly and in an objectively reasonable manner given the circumstances.

34. Based upon information and belief, the City of Collierville Police Department failed to conduct an investigation into the disappearance of Lorenzen Wright.

35. Based upon information and belief, the actions by the City of Collierville Police Department followed the policies and procedures as established by the City of Collierville for the handling of a missing person report.

36. That on July 21, 2010, still concerned over the disappearance of her son, Plaintiff Deborah Marion took action and contacted and informed the local media about Lorenzen Wright's disappearance.

37. Based upon information and belief, that when the City of Collierville Police Department was contacted by local media regarding the disappearance of Lorenzen Wright, the

City of Collierville Police Department would only confirm that a missing person report had been filed and that there was no evidence of “foul play.”

38. That the local media coverage concerning the disappearance of Lorenzen Wright continued for the next seven days.

39. Based upon information and belief, during the time that the City of Collierville Police Department was handling the missing person report of Lorenzen Wright there was little, if any, cooperation with other local law enforcement agencies, including but not limited to the City of Germantown Police Department.

40. Based upon information and belief, it was the policy and procedure of the County of Shelby, Tennessee to not monitor and ensure that local law enforcement agencies were cooperating on matters such as 911 calls and missing person reports.

41. Based upon information and belief, not until July 27, 2010 did the unknown 911 call dispatcher from the City of Germantown, who received the initial 911 call from Lorenzen Wright’s cell phone on July 19, 2010, inform the supervisor of the 911 call.

42. Based upon information and belief, within 24 hours of receiving this information from the unknown 911 call dispatcher of the City of Germantown the remains of Lorenzen Wright were discovered in a wooded section of a road known as Callis Cutoff Road.

43. Based upon information and belief, the local authorities used cell phone technology to identify the area to begin looking for the remains of Lorenzen Wright and did in fact use this technology to locate the remains of Mr. Wright.

44. That during the nine days in which Lorenzen Wright was missing, there was a period of extreme heat in the area in which Lorenzen Wright was found.

45. That the area in which Lorenzen Wright’s remains were found is an area inhabited

by a wide variety of wildlife.

46. That on July 27, 2010, there was at least one-half inch of rain in the area in which the remains of Lorenzen Wright were found.

47. Based upon information and belief, this extreme heat, wildlife and rain collectively disturbed and corrupted the crime scene which caused the loss of valuable evidence and has severely hampered the investigation into the death of Lorenzen Wright.

48. Based upon information and belief, the remains of Lorenzen Wright weighed only 57 pounds at the time they were discovered.

49. Based upon information and belief, the exact same technology that was used to discover the remains of Lorenzen Wright could have been used at a much earlier date to find either Lorenzen Wright or his remains.

50. That one of the primary reasons that this technology was not used at an earlier date is the policies and procedures that were followed by the respective governmental defendants. These policies and procedures include, but are not limited to, the handling of a 911 call, the handling of a missing person report and the failure of requiring various law enforcement agencies to cooperate and effectively coordinate their efforts. The aforementioned factors were a direct and proximate cause which led to the delayed discovery.

51. That one of the primary reasons that this technology was not used earlier was a direct and proximate result of the policies and procedures of the City of Germantown which failed to provide for an adequate response to a 911 call in which gunshots were heard.

52. That one of the primary reasons that this technology was not used earlier was a direct and proximate result of the City of Germantown's failure to adequately train its officers on the appropriate response to a 911 call in which gunshots were heard.

53. That one of the primary reasons that this technology was not used earlier was a direct and proximate result of the policies and procedures of the City of Collierville which failed to provide for an adequate response and investigation of a missing person report.

54. That one of the primary reasons that this technology was not used earlier was a direct and proximate result of the City of Collierville's failure to adequately train its officers on the appropriate response and investigation of a missing person report.

55. That one of the primary reasons that this technology was not used earlier was a direct and proximate result of the policies and procedures of the County of Shelby, Tennessee which failed to provide for cooperation and monitoring of the 911 call center of local law enforcement and missing person reports of local law enforcement.

56. That one of the primary reasons that this technology was not used earlier was a direct and proximate result of the County of Shelby, Tennessee's failure to train other local law enforcement in cooperating and monitoring of the 911 call center of local law enforcement and missing person reports of local law enforcement.

57. That at all times complained of the employees of the City of Germantown acted as agents of the principal City of Germantown. Further, the City of Germantown ratified the actions of its agents, the employees of the City of Germantown.

58. That at all times complained of the employees of the City of Collierville acted as agents of the principal City of Collierville. Further, the City of Collierville ratified the actions of its agents, the employees of the City of Collierville.

59. That at all time complained of the City of Germantown and City of Collierville acted as agents of the principal County of Shelby, Tennessee. Further, the County of Shelby, Tennessee ratified the action of its agents, the City of Germantown and City of Collierville.

60. That the acts, including the acts of omission, on the part of the various governmental defendant (City of Germantown, City of Collierville, County of Shelby, Tennessee) demonstrates a deliberate indifference to Lorenzen Wright, his children and his parents.

61. The due to the violations of the Plaintiffs' constitutional rights in contravention of the Civil Rights Act (42 U.S.C. Sec. 1981 *et seq.*), for the negligence of the Defendants, for the gross negligence of the Defendants, for the wrongful death, mishandling of a human corpse, infliction of emotional distress, and pain and suffering caused by the Defendants, the Plaintiffs seeks compensatory, special, exemplary and punitive damages in an amount of Two Million (\$2,000,000.00) Dollars.

Count One

Violation of 42 U.S.C. Sec. 1981 *et seq.*

62. The Plaintiffs restate, reiterate and incorporate by reference all of the allegations contained in paragraphs 1-61 as if set forth herein verbatim.

63. Access and use of the police services of a municipality or other governmental entity is a privilege of citizenship guaranteed under the Fourteenth Amendment of the United States Constitution.

64. Access and use of the police services of a municipality or other governmental entity is a right of citizenship guaranteed under the Equal Protection Clause of the Fourteenth Amendment of the United States Constitution.

65. Access and use of the police services of a municipality or other governmental entity is a right of citizenship guaranteed under the Due Process Clauses of the Fifth and Fourteenth Amendment of the United States Constitution.

66. When Lorenzen Wright called 911, he was seeking to access police services that are available to all citizens.

67. The circumstances of, and the content of, this 911 call merited a rapid response from the City of Germantown.

68. The City of Germantown failed to act in an appropriate manner.

69. This failure to act on the part of the City of Germantown is a direct and proximate result of the policies and procedures adopted by the City of Germantown for the handling of a 911 call.

70. This failure to act on the part of the City of Germantown is a direct and proximate result of the failure of the City of Germantown to properly train its 911 dispatchers.

71. This failure to appropriately act on the 911 call demonstrates a deliberate indifference on the part of the City of Germantown towards Lorenzen Wright, his children and his parents.

72. When Plaintiff Deborah Marion filed the missing person report regarding the disappearance of Lorenzen Wright, the City of Collierville failed to appropriately respond and investigate the contents of this report.

73. This failure to act on the part of the City of Collierville is a direct and proximate result of the policies and procedures adopted by the City of Collierville for the handling and investigating of a missing person report.

74. This failure to act on the part of the City of Collierville is a direct and proximate result of the failure of the City of Collierville to properly train its officers in the handling and investigation of a missing person report.

75. This failure to appropriately act in the handling and investigating of a missing

person report demonstrates a deliberate indifference on the part of the City of Collierville towards Lorenzen Wright, his children and his parents.

76. The failure of the City of Germantown and the City of Collierville to coordinate their investigations is a direct and proximate result of the policies and procedures of County of Shelby, Tennessee.

77. The failure of City of Germantown and City of Collierville 911 dispatch centers to be centrally monitored is a direct and proximate result of the policies and procedures of County of Shelby, Tennessee.

78. The failure of the City of Germantown and the City of Collierville to coordinate their investigations is a direct and proximate result of the County of Shelby, Tennessee to train these local law enforcement agencies.

79. That these acts, and acts of omission, on the part of County of Shelby, Tennessee demonstrate a deliberate indifference to Lorenzen Wright, his children and his parents.

80. The acts, and acts of omission, on the part of the City of Germantown, City of Collierville, and County of Shelby, Tennessee constitute state action.

81. Lorenzen Wright, his children and his parents are all citizens who are entitled to protections as found in the United States Constitution. Further, Lorenzen Wright, his children and his parents are all victims of the crime that was perpetrated upon the body of Lorenzen Wright.

82. That the acts, and acts of omission, of City of Germantown, City of Collierville and County of Shelby, Tennessee violated the constitutional rights of the Plaintiffs as follows: 1) denied the Plaintiffs the protection of the police services (violation of immunities and privileges and equal protection under the law); 2) failed to conduct a proper investigation into an apparent

emergency 911 call (violation of due process and equal protection under the law; 3) failure to conduct a proper investigation into a missing person report (violation of due process and equal protection under the law); and 4) acts which have led to the inability to conduct a proper investigation into the death of Lorenzen Wright (violation of due process and equal protection under the law).

83. The above list is not all inclusive. It is the sincere belief that as discovery in this litigation goes forward there will be found additional violations of the constitutional rights of the Plaintiffs. As the violations are found, these Plaintiffs reserve the right to amend this Complaint.

84. As the direct and proximate result of the violation of the Plaintiffs' constitutional rights the Plaintiffs have been damaged in an amount to be proven at a hearing of this cause

Count Two

Negligence

85. The Plaintiffs restate, reiterate and incorporate by reference all of the allegations contained in paragraphs 1-84 as if set forth herein verbatim.

86. That the failure of the unknown 911 dispatcher of the City of Germantown to notify anyone of the 911 call on July 19, 2010 constitutes an act of negligence.

87. That the failure of the unknown 911 dispatcher of the City of Germantown to wait for eight (8) days to notify a supervisor of the July 19, 2010 911 call constitutes an act of negligence.

88. That the failure of the City of Germantown, by and through the actions of its agents, to not properly respond to the July 19, 2010 911 call constitutes an act of negligence.

89. That the failure of the City of Germantown to not properly monitor its 911 calls in order to intercept a call such as the one received on July 19, 2010 constitutes an act of

negligence.

90. That the failure of the City of Collierville, by and through the actions of its agents, to not properly respond and investigate a missing persons report constitutes an act of negligence.

91. That the failure of the County of Shelby, Tennessee, by and through the actions of its agents, to not properly coordinate and monitor the actions of various local law enforcement agencies constitutes an act of negligence.

92. The above list is not all inclusive. It is the sincere belief that as discovery in this litigation goes forward there will be found additional acts of negligence on the part of these Defendants. As these additional acts of negligence are found, these Plaintiffs reserve the right to amend this Complaint.

93. That as a direct and proximate result of Defendants' act of negligence the Plaintiffs have been damaged in an amount to be proven at a hearing of this cause.

Count Three

Gross Negligence

94. The Plaintiffs restate, reiterate and incorporate by reference all of the allegations contained in paragraphs 1-93 as if set forth herein verbatim.

95. The fact that Lorenzen Wright was missing for a period of nine (9) days and that it took a period of eight (8) days in order for the unknown 911 dispatcher of the City of Germantown to properly respond to his 911 call demonstrates facts which support gross negligence on the part of these Defendants.

96. That due to the Defendants' gross negligence the Plaintiffs have been damaged in an amount to be proven at a hearing of this cause.

Count Four

Wrongful Death

97. The Plaintiffs restate, reiterate and incorporate by reference all of the allegations contained in paragraphs 1-96 as if set forth herein verbatim.

98. Based upon information and belief, on July 19, 2010 when the City of Germantown received the 911 call from the cell phone of Lorenzen Wright, Lorenzen Wright was still alive.

99. Had the City of Germantown properly responded to the 911 call by using the cell phone technology that was used to discover his remains some nine (9) days later, Lorenzen Wright would have been found alive.

100. The exact time of death of Lorenzen Wright is unknown.

101. As a direct and proximate result of the failure of the City of Germantown to properly respond to the 911 call of Lorenzen Wright, Lorenzen Wright died at the crime scene.

102. The inaction of the City of Germantown resulted in the wrongful death of Lorenzen Wright.

103. As a result of the wrongful death of Lorenzen Wright, the Plaintiffs would be entitled to recover any and all damages that are derived from this cause of action.

104. That due to the wrongful death of Lorenzen Wright the Plaintiffs have been damaged in an amount to be proven at a hearing of this cause.

Count Five

Mishandling a Human Corpse

105. The Plaintiffs restate, reiterate and incorporate by reference all of the allegations contained in paragraphs 1-104 as if set forth herein verbatim.

106. Had the City of Germantown properly responded to the 911 call, of July 19, 2010, and used the cell phone technology that was used to discover his remains some nine (9) days later at an earlier time, the remains of Lorenzen Wright would not have been in the deplorable condition in which they were found.

107. Had the City of Collierville properly responded and investigated the missing person report of Lorenzen Wright, the remains of Lorenzen Wright would not have been in the condition in which they were found.

108. Had the County of Shelby, Tennessee properly monitored and coordinated the activities of the City of Germantown and the City of Collierville, the remains of Lorenzen Wright would not have been in the condition in which they were found.

109. That as a direct and proximate result of the acts, and acts of omission, of City of Germantown, City of Collierville and County of Shelby, Tennessee, Lorenzen Wright's remains were not found in a condition which afforded his family the opportunity to conduct a proper funeral, burial and memorial service. The conditions of his remains did not afford him the memorial that was fitting of an individual of his stature in the community. Nor, did it afford the family a memorial that was in line with their religious beliefs.

110. That these acts and acts of omission constitute a mishandling of a human corpse.

111. That due to the Defendants' mishandling of a human corpse the Plaintiffs have been damaged in an amount to be proven at a hearing of this cause.

Count Six

Infliction of Emotional Distress

112. The Plaintiffs restate, reiterate and incorporate by reference all of the allegations contained in paragraphs 1-111 as if set forth herein verbatim.

113. The acts and acts of omission on the part of City of Germantown, City of Collierville and County of Shelby, Tennessee have inflicted and caused severe and extreme emotional distress upon all of the Plaintiffs.

114. Plaintiff Deborah Marion, since this incident, has been diagnosed with post traumatic stress disorder among other medical conditions.

115. Plaintiff Deborah Marion has been under the care of various physicians since this incident.

116. That due to the Defendants' infliction of emotional distress the Plaintiffs have been damaged in an amount to be proven at a hearing of this cause.

Count Seven

Pain and Suffering

117. The Plaintiffs restate, reiterate and incorporate by reference all of the allegations contained in paragraphs 1-116 as if set forth herein verbatim.

118. The acts and acts of omission on the part of City of Germantown, City of Collierville and County of Shelby, Tennessee have caused great pain and suffering upon all of the Plaintiffs.

119. That due to the Plaintiffs' pain and suffering the Plaintiffs have been damaged in an amount to be proven at a hearing of this cause.

WHEREFORE, premises considered, the Plaintiffs pray:

1. That proper process and notice issue and be served upon the Defendants herein requiring them to answer this Complaint.
2. That the Plaintiffs reserve the right to amend the complaint.
3. That upon a hearing of this cause that the matters in controversy be decided by a jury.

4. That upon a hearing of this cause, the Plaintiff be awarded damages both compensatory, special, exemplary and punitive in an amount to be proven at a hearing of the cause.
5. That upon a hearing of this cause, the Plaintiff be awarded attorneys fees and appropriate court cost and expenses for having to bring this action.
6. For such other and further relief as may be just and proper within these premises.

Respectfully submitted,

/s/Paul Forrest Craig
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