

IN THE CIRCUIT COURT FOR MAURY COUNTY, TENNESSEE

FILED
SANDY McCLAIN, CIRCUIT CLERK
MAURY COUNTY, TN
2022 JUN 22 AM 11:36

David Baker,)
Plaintiff,)
v.)
Shelia K Butt,)
Defendant.)

Docket No. 17292

COMPLAINT FOR DEFAMATION

Comes now the Plaintiff, David Baker, by and through counsel, and in support for his cause of action against the Defendant, Shelia K. Butt, states to the Court the following:

Jurisdiction and Venue

1. Plaintiff David Baker (“Mr. Baker”) is a citizen and resident of Maury County, Tennessee, residing at 2685 Hampshire Pike, Columbia, Tennessee 38401, and has been a citizen and resident of said county and state at all times pertinent to the facts of this cause.

2. Upon information and belief, it is submitted that Defendant Shelia K. Butt (“Ms. Butt”) is a resident of Maury County, Tennessee, residing at 3870 Albert Matthews Road, Columbia, TN 38401, and has been a citizen and resident of said county at all times pertinent to the facts of this cause.

3. This court has jurisdiction over this matter under Tennessee Code Annotated § 16-11-101 and § 2-17-101, *et seq.* Venue is properly laid in this Court.

FACTS

4. At all times relevant to this litigation Plaintiff Mr. Baker was a candidate for the republican nomination for Mayor of Columbia, Tennessee.

5. At all times relevant to this litigation Defendant Ms. Butt was a candidate for the republican nomination for Mayor of Columbia, Tennessee.

6. Plaintiff would show that on or about April 11, 2022, the Defendant

intentionally published false and defamatory information which she knew were untrue about Plaintiff. Ms. Butt sent a text message to Republican activist Rick Williams with the knowledge the statements were false and defaming to Mr. Baker. (Exhibit A). Ms. Butt further made these statements with reckless disregard for the truth and/or with negligence in failing to ascertain the truth of the statements.

7. The false and defamatory statements included untrue claims Mr. Baker was guilty of “fraud” and was responsible for “a man committing suicide.” She further without proof asserted that members of the community were “mad” at Mr. Baker and they he would be “harmed.”

8. At the time the false statements were made Ms. Butt was well aware her statements were false, misleading and defamatory.

9. At the time the false statements were made Ms. Butt acted with reckless disregard for the truth and/or with negligence in failing to ascertain the truth of the statements.

10. At the time the false statements were made Ms. Butt acted with actual malice with the intent of harming Mr. Baker.

11. On information and belief, Ms. Butt published these false and defamatory statements in an attempt to intentionally disparage Mr. Baker and harm his reputation in the community.

12. As a result of these false and defamatory statements, Mr. Baker’s reputation and standing in the community was damaged.

13. Ms. Butt further published the false and defamatory statements to other members of the community with the express intent and purpose of harming Mr. Baker.

14. Plaintiff specifically published to these third-parties false statements alleging Mr. Baker was guilty of “fraud” and responsible for a man’s suicide.

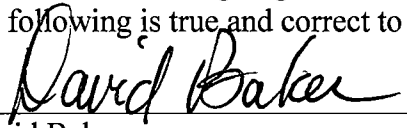
15. This Complaint may be amended if additional improper or illegal conduct is discovered prior to trial.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays:


1. That this Court conduct a trial on this Complaint;
2. That a summons issue to be served on the Defendant;
3. That the Defendant be required to answer the Complaint and discovery proffered with the Complaint within forty-five (45) days;
4. That the court find Ms. Butt's intentional and/or reckless publication of false and untrue statements rise to the level of defamation under Tennessee law; and,
5. That Plaintiff be granted such other further and general relief as is just.

I have read the foregoing and know the contents thereof. I declare under penalty of perjury that the following is true and correct to the best of my knowledge.



David Baker

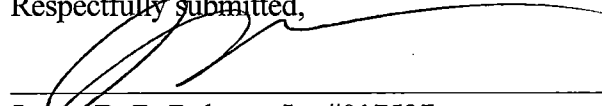
SUBSCRIBED AND SWORN TO BEFORE ME, David Baker, on June 21, 2022, after personally appearing before me.



Notary Public

My commission expires: September 6, 2022

Respectfully submitted,



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