IN THE CIRCUIT COURT OF WASHINGTON COUNTY
STATE OF ARKANSAS

HANNAH PRICE,

Plaintiff

vs. COMPLAINT

SUSANNAH WILSON and REBECCA THOMAS

Defendants

Complaint

For her complaint against the defendants, plaintiff makes the following allegations:

1. Plaintiff is a resident and citizen of the City of Fayetteville, County of Washington, State of Arkansas, and at all times hereinafter mentioned was in the general employment of Susannah Wilson as a sales person at her retail store located at 612 Emma Street in the City of Springdale, Arkansas.

2. Defendant Susannah Wilson, doing business as Susannah's Fashions, is an individual engaged in the business of selling clothes within the city of Springdale.

3. Defendant Rebecca Thomas is an individual residing in the County of Washington, State of Arkansas, and at all times herein mentioned was acting for and on behalf of herself and as agent, servant, employee and as manager in sole charge of defendant Wilson's retail store in the City of Springdale, at which plaintiff was employed.

4. On January 12, 2009, defendant Thomas acting individually and as agent, servant, and employee of the other named defendant, did accuse plaintiff of stealing a dress from the merchandise belonging to Susannah's Fashions and demanded that the dress be returned to the store on or before January 13, 2009 and threatened that if the dress was not returned, appropriate action would be taken against the plaintiff. In making the above-described and substantially set forth accusation and threat, defendant Thomas used the following words: "Hannah Price, you're a lying thief. I want the dress tomorrow or else."

5. Defendant Rebecca Thomas made the above-described accusation against plaintiff in the presence of Wanda Williams, another employee of Susannah's Fashions, who, in turn, transmitted and published defendant’s accusations to other employees in the store and conveyed to the general public that plaintiff was a thief, that plaintiff had stolen a dress from her employer, and that plaintiff would be prosecuted for the crime, which statements

by defendant were intended to, and did, deprive plaintiff of public confidence and good will, and lowered the reputation of plaintiff in the opinion of plaintiff's fellow employees, friends, and the general public. Defendant's statements were wrongful, unlawful, and malicious, and meant, and were taken to mean by those hearing them, that plaintiff is a person of bad reputation who could not be trusted in employment and was not qualified to be employed.

6. Defendant's malicious, unlawful, unprivileged, and false statements, transmitted to plaintiff's fellow employees and friends and the general public, exposed plaintiff to public hatred, contempt, and ridicule, and tended to deprive plaintiff of public confidence and injured her in her occupation, to plaintiff's damage in the sum of $5,000.

7. By reason of the false, wrongful, and malicious statements by defendant, plaintiff has been disgraced and her good name tarnished and her character tarnished and blackened, and plaintiff has suffered humiliation and shame and has been unable to find employment in the City of Springdale, or the County of Washington, by reason of the false, malicious statements set forth above made by defendant, which have deprived plaintiff of her livelihood to her damage in the sum of $10,000.

WHEREFORE, Plaintiff prays that the court assess against the defendants, Susannah Wilson and Rebecca Thomas, compensatory damages of $15,000, punitive damages of $25,000, court costs and other relief that may be appropriate.

ABBOTT AND BAKER
Attorneys for the Plaintiff

By_____

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