

IN THE CIRCUIT COURT OF LEFLORE COUNTY, MISSISSIPPI

ALBERT LEE ABRAHAM, JR.

PLAINTIFF

VS.

CAUSE NO.

2012-0053 LFC

R. ARNOLD SMITH, JR., M.D.,
NORTH CENTRAL MISSISSIPPI REGIONAL
CANCER CENTER, and Defendants A Through R,
Being Those Persons or Legal Entities Whose True
Names Have Yet to be Discovered

DEFENDANTS

COMPLAINT

COMES NOW, Plaintiff Albert Lee Abraham, Jr., by and through his attorneys, and as his initial Complaint for damages, would state:

- 1) Plaintiff, Lee Abraham ("Abraham"), is an adult resident of Leflore County, Mississippi.
- 2) Defendant, R. Arnold Smith, M.D. ("Smith"), is an adult resident citizen of Leflore County, Mississippi and may be served with process through and at the direction of the Leflore County Sheriff's Department which currently has custody of him.
- 3) Defendant, North Central Mississippi Regional Cancer Center, Inc. ("Cancer Center"), is a Mississippi corporation, which may be served with process through its registered agent for process, R. Arnold Smith, Jr., who is currently in the custody of the Leflore County Sheriff's Department.
- 4) Defendants A through R are persons or entities who committed or conspired to commit acts similar in nature to those described herein. Plaintiff Abraham is currently unaware of the name[s] of those persons and entities. When their true identities are discovered, Plaintiff Abraham will request that all pleadings and proceedings be amended by substituting the true names

and Plaintiff Abraham will give proper notice to the opposing parties.

5) Defendant Smith is a principal officer and director of Defendant Cancer Center. Defendant Smith is the agent of Defendant Cancer Center and treats this legal entity as his own, an alter ego of Defendant Smith. Defendant Cancer Center is but a legal fiction of Defendant Smith.

6) Defendants reached an understanding or meeting of the minds and entered into a conspiratorial agreement to kill Plaintiff Abraham. Although thwarted by law enforcement officers, the Defendants attempted to carry out their conspiratorial agreement by sending would-be assassins to Abraham's office to kill him.

7) Defendants solicited others, including Keaira Byrd and Derrick Lacy, to murder Plaintiff Abraham.

8) Defendants promised money to others for the murder of Plaintiff Abraham.

9) Defendants' actions were intentional and designed obviously to cause Plaintiff Abraham harm including death.

10) Defendants' actions were defeated, but not without causing Plaintiff Abraham substantial harm including but not limited to mental and emotional distress. Defendants' actions were so heinous as to cause outrage and revulsion.

11) As a result of Defendants' actions, Plaintiff Abraham has been and is altering normal daily activities and, therefore, has suffered the loss of enjoyment of his normal life.

12) Defendants' actions were intentional and, if not, were grossly negligent and without legitimate purpose. As such, Plaintiff Abraham is entitled to punitive damages.

WHEREFORE, PREMISES CONSIDERED, Plaintiff Albert Lee Abraham, Jr. respectfully demands a judgment against all defendants for compensatory, punitive and consequential damages,

including attorneys' fees, expenses of litigation, pre- and post-judgment interest, and costs of Court.

This the 11 day of July, 2012.

Respectfully submitted,

By: [Signature] MSB# 100869 for
Ralph E. Chapman, MSB # 5962
Chapman, Lewis & Swan
P. O. Box 428
Clarksdale, MS 38614
(662) 627-4105

OF COUNSEL:

H. SCOT SPRAGINS, MSB # 7748
Hickman, Goza & Spragins, PLLC
Post Office Drawer 668
Oxford, MS 38655-0668
(662) 234-4000

FILED
July 13, 2012
BY: [Signature] D.C.
CIRCUIT CLERK