

IN THE CIRCUIT COURT OF ROBERTSON COUNTY, TENNESSEE  
AT SPRINGFIELD

PEPPER BLACK, S. BRAD DOZIER, )  
)  
)  
Plaintiffs, )  
)  
v. )  
)  
THERESA BALDWIN, )  
)  
Defendant. )

Case No. 74CC1-2022-CV-247 KRISTY A. CHOWNING, CLERK  
JURY DEMANDED

Fax  
FILED  
APR 10 2023  
AT 3:13 O'CLOCK P M  
BY Chowning

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AMENDED COMPLAINT

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Come now Pepper Black and S. Brad Dozier, by and through counsel, for their Amended Complaint against Theresa Baldwin, state as follows:

PARTIES

1. Plaintiff Pepper Black ("Mrs. Black") is a resident of Mt. Juliet, Tennessee, in Rutherford County.
2. Plaintiff S. Brad Dozier ("Mr. Dozier") is a resident of Mt. Juliet, Tennessee, in Rutherford County and is the husband of Mrs. Black.
3. Defendant Theresa Baldwin ("Ms. Baldwin") is a resident of Greenbrier, Tennessee, in Robertson County.

JURISDICTION AND VENUE

4. This Court has jurisdiction over the subject matter of this action pursuant to Tenn. Code Ann. § 16-10-101, *et seq.*
5. Personal jurisdiction is proper in this Court pursuant to Tenn. Code Ann. § 20-2-223.

6. Venue is proper in Robertson County, Tennessee pursuant to Tenn. Code Ann. § 20-4-101, *et seq.*

**FACTS**

7. The relationship between Ms. Baldwin and her daughter, Gracie, has been contentious and dysfunctional for years. Her frustration in having no positive relationship or control over her daughter has led her into a bizarre pattern of reckless and abusive behavior. This tumultuous relationship was exacerbated when Gracie sought comfort in the home of Mrs. Black and Mr. Dozier after an incident on December 7, 2020 in which Defendant threw Gracie's belongings in the front yard of their home and ordered her from the premise despite being a minor. Gracie, a friend of the Plaintiff's daughter, responded positively to the kindness of the Plaintiffs, who gave her shelter after her mother rendered her homeless. The psychological issues manifested by the behavior of Ms. Baldwin perhaps explain, but do not excuse, her malicious campaign against the Plaintiffs. No reasonable person would act in this manner. No reasonable person should be expected to endure it.

8. On December 7, 2020, Gracie and Ms. Baldwin's fighting became so intense that Ms. Baldwin drove her daughter from her home. From that date until December 26th, Ms. Baldwin had no contact and "did not keep up with" her minor child's whereabouts.

9. As a result of being rendered homeless by her mother, Gracie came to stay at the home of Mrs. Black and Mr. Dozier shortly thereafter. Gracie was acquainted with Mrs. Black's daughter from school.

10. Mrs. Black and Mr. Dozier had a pre-planned trip to Universal Studios in Florida with their children in late December of 2020. Having heard nothing from Ms. Baldwin, Mrs.

Black and Mr. Dozier took Gracie with them on their family vacation rather than leaving her alone.

11. On December 26, 2020, Ms. Baldwin called the police and claimed Mrs. Black and Mr. Dozier had 'kidnapped' Gracie and had taken her across state lines. This was a false statement and the defendant knew it was false.

12. Mrs. Baldwin tried to convince the police officers to press charges against Mrs. Black and Mr. Dozier, but after discussions with ADA Jason White, the officers concluded Mrs. Black and Mr. Dozier had committed no crimes.

13. Around midnight on December 26, 2020, at Ms. Baldwin's urging, officers in Florida conducted a wellness check of Gracie, who was with Mrs. Black and Mr. Dozier and their family, and found that "everything was fine; no signs of distress or discontent."

14. Gracie left Mrs. Black and Mr. Dozier's home in January of 2021 and returned to her mother's house in Greenbrier. Ms. Baldwin then sent Gracie to a school out of state, interrupting her senior year in high school. The school is dedicated to treating "problem" children.

15. After leaving the out-of-state school, Gracie attempted to live with Ms. Baldwin again. However, the police were called in August of 2021 after Ms. Baldwin again drove her daughter from the home.

16. In February of 2022, Gracie briefly came back to live with Mrs. Black and Mr. Dozier. Gracie is now emancipated by age. She is employed and lives apart from Ms. Baldwin.

17. By June of 2022, Ms. Baldwin had mentally disintegrated. She began a ceaseless and unseemly campaign of harassment, abuse, and intimidation against Mrs. Black and Mr. Dozier by publishing numerous videos on the TikTok streaming service, claiming that Mr.

Dozier is a pedophile and that both Mrs. Black and Mr. Dozier were “grooming” Gracie. TikTok is a Chinese-owned streaming service under scrutiny for improper use of information, including the use of algorithms to promote conflict.

18. Ms. Baldwin has published approximately one hundred (100) videos falsely accusing Mrs. Black and Mr. Dozier *inter alia* of pedophilia, kidnapping, grooming, and being extremely dangerous.

19. On or around June 27, 2022, Ms. Baldwin published a video naming Mrs. Black and Mr. Dozier, using the hashtags: #pepperblack; #braddozier; #childendangerment; #abusive; and #dangerous. In that video, Ms. Baldwin states she has a ‘frightening story’ to tell and that she wants to warn other parents about them. This video is labeled “Part 1” of what became a series of at least seventy-four (74) separate videos, all of which comprise “Season 1” of her “story”.

20. In Part 1, Ms. Baldwin began a series of accusations against Gracie, claiming her to be an out-of-control daughter who would be a negative influence on Mrs. Black’s daughters.

21. In Parts 2, 3, and 4 of “Season 1”, all published on June 30, 2022, Ms. Baldwin continued to tell her “story”, falsely claiming that Mr. Dozier was inappropriately fixated on Gracie, and continued to use the hashtags #dangerous; #beware; and #protectyourkids.

22. In Part 5, also published on June 30, 2022, Ms. Baldwin specifically named Pepper Black and Brad Dozier in the video, as opposed to simply including their names in hashtags. In that video, Ms. Baldwin falsely claimed that Gracie, along with two of Mrs. Black’s daughters, were forced to climb up in Mr. Dozier’s bed with him for “prayer time.”

23. In Part 6, published on June 30, 2022, Ms. Baldwin accused Mrs. Black and Mr. Dozier of trying to “brainwash” Gracie. Ms. Baldwin also used the same hashtags of #dangerous; #beware; and #protect your kids.

24. In Part 7, published on June 30, 2022, Ms. Baldwin used the same hashtags, falsely claimed that Mrs. Black and Mr. Dozier offered Gracie trips, a car, phone and money, and asked the question: “How is that not grooming?”

25. In Part 9, published on July 2, 2022, Ms. Baldwin used the same hashtags and commented on the trip to Florida, then threatened violence: “It terrifies me to think what I would do if I ran into this woman!” (referring to Ms. Black).

26. In Part 12, published on July 2, 2022, Ms. Baldwin claimed that Gracie was “crawling up in his [Mr. Dozier’s] bed” and that Mr. Dozier and Mrs. Black were “lurking in the dark.” These were lies and specifically intended to place Plaintiffs in a false light.

27. In Part 13, published on July 2, 2022, using the same hashtags, Ms. Baldwin stated: “Nothing worse than having your child taken right from under you and basically kidnapped!” This referred to her adult daughter whom she had ejected from her home while still a minor.

28. In Part 15, published on July 3, 2022, using the same hashtags along with #ASEA (Mrs. Black’s company) and #nashvilleattorney (referring to Mr. Dozier, who is a licensed attorney in Tennessee), Ms. Baldwin stated about Mr. Dozier, whom she identified by name: “Does he have any idea of the laws he’s breaking?”

29. In Part 16, published on July 3, 2022, with the same hashtags, Ms. Baldwin stated: “When people take your child that you don’t even know”, clearly suggesting that Mrs. Black and Mr. Dozier had kidnapped Gracie.

30. In Part 18, published on July 3, 2022, using the same hashtags, Ms. Baldwin stated: "You groomed my daughter." "You are a fraud and a liar. And I don't know if you are a predator or a pedophile", clearly implying that Mr. Dozier was both. Ms. Baldwin further threatened both Mrs. Black and Mr. Dozier, stating: "You messed with the wrong mom. Both of you!"

31. In Part 20, published on July 4, 2022, Ms. Baldwin outrageously stated: "He could have taken her to Thailand and just sold her." Further, she stated that Mr. Dozier "could face child endangerment and kidnapping" charges. This is referring to Gracie, a legally emancipated young woman.

32. In Part 21, published on July 4, 2022, Ms. Baldwin stated that Mrs. Black and Mr. Dozier had "falsified" court documents claiming that Gracie had been abandoned and neglected.

33. In Part 24, published on July 5, 2022, Ms. Baldwin stated that Gracie "does not want to stay with these people!", again implying that she was being held against her will. This is a false statement and Baldwin knew that her adult daughter resided with them voluntarily and appreciated their kindness.

34. In Part 25(b), published on July 5, 2022, Ms. Baldwin stated: "When all this started, my daughter was a minor and these people were grooming her..." Ms. Baldwin further stated: "And you're gonna tell me this isn't a cult?"

35. In Part 28, published on July 5, 2022, Ms. Baldwin stated that Gracie would never have bonded with Mrs. Black's daughter "if their mother had not basically stolen my child!"

36. In Part 29, published on July 5, 2022, Ms. Baldwin repeatedly referenced by name to one of Mrs. Black's daughters, a minor.

37. In Part 30, published on July 5, 2022, Ms. Baldwin stated about Mrs. Black: "You are such a pathetic human being! You are just as much a liar and a fraud as your husband!"

38. In Part 31, published on July 5, 2022, Ms. Baldwin stated about Mrs. Black and Mr. Dozier: "They should probably be in jail for kidnapping!"

39. In Part 33, published on July 6, 2022, Ms. Baldwin repeated the accusation that Mr. Dozier and Mrs. Black required "prayer sessions" in their bed and with Gracie in night clothes. Ms. Baldwin was clearly implying that Mr. Dozier was committing sexual crimes with Gracie. Ms. Baldwin further stated about Mrs. Black: "You brainwashed my daughter!"

40. In Part 38, published on July 6, 2022, Ms. Baldwin stated that Mr. Dozier offered Gracie a car, phone, and a trip to Florida, and then stated: "Why would I not think he's a pedophile? Something sinister going on? You lied to police. You lied to the judge."

41. In Part 49, published on July 9, 2022, Ms. Baldwin stated that Gracie "is completely brainwashed"; and that Gracie had been "groomed by these people for weeks."

42. In Part 53, published on July 11, 2022, Ms. Baldwin asked: "Does Gracie have Stockholm Syndrome?" This is a reference to bonds said to form between hostages and their captors.

43. In Part 56, published on July 11, 2022, Ms. Baldwin referring to Mrs. Black admitted: "I've threatened her life if she doesn't stay away from my daughter!"

44. In Part 58, published on July 11, 2022, Ms. Baldwin stated that she had made arrangements for Gracie to go to "boarding school" and that Gracie threatened to never speak to her again. Ms. Baldwin stated: "but I'd already lost her to this cult family! In those few days, they ruined everything. They ruined her life. They ruined my life."

45. In Part 59, published on July 12, 2022, Ms. Baldwin stated that Gracie, while at "boarding school," realized how dangerous and inappropriate Mrs. Black's and Mr. Dozier's treatment of her was.

46. In Part 61, published on July 12, 2022, Ms. Baldwin stated that she knew she was dealing with "lunatics" who are guilty of "child endangerment."

47. In Part 64, published on July 12, 2022, Ms. Baldwin, referring to Mrs. Black's company ASEA, stated: "Guess who is a diamond member of a multi-level marketing group?" Ms. Baldwin further included a screen shot from an article in Psychology Today claiming that MLM groups "operate much like cults."

48. In Part 65, published on July 17, 2022, Ms. Baldwin boasted that she now had almost 9,000 followers on her TikTok page, that she was simply a mother of a daughter who was manipulated and alienated, and to be aware if you live in Mt. Juliet. She stated: "I hope you're listening, cult leader!" "That house is being ran (sic) like a cult!" Ms. Baldwin further claimed that Mrs. Black and Mr. Dozier were demanding that Gracie change her last name, and that they were "branding the child."

49. In Part 68, published on July 17, 2022, Ms. Baldwin stated that "complete f...ing strangers were able to steal your child." Ms. Baldwin further claimed that Mrs. Black had been married five times "and has whored around her entire life" and is now "giving my daughter relationship advice!"

50. In Part 70, published on July 20, 2022, Ms. Baldwin posted a graphic: "What does grooming mean?" Referring to Mrs. Black and Mr. Dozier, Ms. Baldwin stated: "That's called grooming!"



51. On July 24, 2022, Ms. Baldwin began published a series of videos called "Season 2."

52. In an unnamed video published on August 8, 2022, using the hashtag #grooming, Ms. Baldwin stated that Mrs. Black had marriage after marriage. She referred to Plaintiffs as "psycho people."

53. In Part 3 of Season 2, published on August 10, 2022, Ms. Baldwin stated: "You are a criminal. A sociopath. Everything I've said is the truth."

54. In Part 4 of Season 2, published on August 12, 2022, Ms. Baldwin stated that she went to Gracie's work to speak with her daughter and that she was stopped by a "junior cult member," referring to one of Mrs. Black's minor daughters. This allegation was repeated in Part 10 of Season 2, published on August 15, 2022.

55. In Part 14 of Season 2, published on August 20, 2022, Ms. Baldwin said about Mrs. Black and Mr. Dozier: "You obviously have something to hide!"

56. In Part 15 of Season 2, published on August 20, 2022, Ms. Baldwin stated about Gracie: "I know that she's been brainwashed and groomed for a year and a half." About Mr. Dozier, she claimed that he was obsessed and fixated with Gracie.

57. On August 25, 2022, Ms. Baldwin published an unnumbered video claiming that Mrs. Black and Mr. Dozier were "two f...ing strangers [who] tried to steal my child". Ms. Baldwin further claimed that her series of videos was her attempt to tell a "grooming prevention story."

58. In Part 16 of Season 2, published on August 26, 2022, Ms. Baldwin stated that Mrs. Black and Mr. Dozier controlled Gracie's access, open her packages, and responded to her emails. Ms. Baldwin stated: "Their house is flat out dangerous!"

59. On August 29, 2022, Ms. Baldwin published an unnumbered video claiming that Mrs. Black "loses her s... daily, blames the devil, throws her kid out of her car on the side of the road, drinks and drives with her kid, then comes home and beats up her other kid."

60. In Part 17 of Season 2, published on August 29, 2022, Ms. Baldwin claimed that she was telling a story about grooming, and that the insanity at Mrs. Black's and Mr. Dozier's house "hasn't stopped for one day." Ms. Baldwin claimed that Mr. Dozier neglected his own daughter for at least 1.5 years while fixated on her daughter. She claimed that this was "all the creepy stuff that pedophiles do", and that when Gracie "became of age, you started grooming her again."

61. In Part 18 of Season 2, published on August 29, 2022, Ms. Baldwin stated that Mrs. Black and Mr. Dozier "groomed my daughter to the point that she now lives with them." "You steal children!"

62. On August 29, 2022, Ms. Baldwin published an unnumbered video stating that "I'm telling my story for the rest of my life! You stole her from me! You tear families apart! I won't stop!"

63. This relentless pattern of videos contains numerous statements that are untrue, malicious, and completely outrageous and are done purely for the purpose of doing harm.

64. The videos published by Ms. Baldwin have severely damaged Mrs. Black's financial affairs and her ability to maintain her current clientele or grow her business, and caused her significant embarrassment and mental distress.

65. The videos published by Ms. Baldwin have caused Mr. Dozier to lose actual and potential clients of his law practice, and caused him significant embarrassment and mental distress.

66. Ms. Baldwin, by her own words, will not stop publishing her salacious, malicious, and false videos about Mrs. Black, Mr. Dozier, or her own daughter, Gracie.

**CAUSES OF ACTION**

**COUNT I – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

*Rogers v. Louisville Land Co.*, 367 SW 3d 196, (S. Ct. 2012).

**Theresa Baldwin has attempted to defraud this Court.**

67. Ms. Baldwin intentionally interfered with Gracie Baldwin’s relationship with her lawyers.

68. When the original complaint was filed, Gracie Baldwin was a willing and cooperative plaintiff. She came to her lawyer’s office, reviewed the pleading and on September 7, 2022 declared under penalty of perjury that the allegations were true.

69. Ms. Baldwin continued to harass and intimidate her daughter. She demanded that she send an email to counsel terminating the relationship at a time when Ms. Baldwin was a defendant and her daughter a plaintiff in a sworn complaint.

70. Ms. Baldwin hired and paid a lawyer to prepare a false affidavit. Gracie never met the attorney. Yet the lawyer forbade communication between Gracie and her attorneys using her purported attorney – client relationship.

71. Ms. Baldwin bullied her daughter to meet her at a UPS store and to sign a faux “affidavit” she had neither seen or read, having never met the lawyer her mother had hired. She has filed a declaration in this case stating that the affidavit was not her testimony and the allegations in the Sworn Complaint are true.

72. Theresa Baldwin accessed her daughter’s email account and sent a message she composed, posing as Gracie, to Plaintiff’s counsel. She has admitted this behavior. This conduct

has nothing to do with real or trumped up First Amendment Rights. It demonstrates malice and mendacity.

73. Theresa Baldwin has intentionally, maliciously and outrageously injured Pepper Black and Brad Dozier because she is jealous of and resents her daughter's friendship with a couple who gave solace to a child ousted as a minor from her mother's residence in the midst of her bizarre behavior. She has employed false publications never protected by the First Amendment or the Tennessee Constitution.

74. Ms. Baldwin has published threats of physical harm towards Ms. Black. She has published information on where she was shopping in order to intimidate and threaten her.

75. She has reached out to former spouses of both Plaintiffs to obtain information she might employ to harm them. She is so freakishly controlling that she interfered with her daughter's ability to communicate with her lawyer. She tried twice to use her own child as a cat's paw in her inexcusable efforts to harm the Plaintiffs.

76. The Defendant's conduct was 1) intentional or reckless, 2) so outrageous that it is not tolerated by civil society, and 3) resulted in serious mental injury to Pepper Black.

#### **Theresa Baldwin Continues Her Outrageous Conduct**

77. Ms. Baldwin continues to publish new videos on an almost daily basis, knowing that the narrative she is pushing, namely that Mr. Dozier is a pedophile, that Mr. Dozier and Mrs. Black kidnapped Gracie, and that they are involved in a cult, are completely false.

78. Ms. Baldwin's actions in publishing numerous videos are intentional and reckless.

79. Ms. Baldwin's publication of these videos is so outrageous that it should not to be tolerated by civilized society.

80. Ms. Baldwin's publication has resulted in severe mental injury, in that Mrs. Black and Mr. Dozier have lost sleep, their reputations in the community and business community have suffered, and as a result of Ms. Baldwin's threats, they no longer feel safe in their home and are fearful of further action by Ms. Baldwin.

**COUNT II - FALSE LIGHT INVASION OF PRIVACY**

81. Plaintiffs are private individuals. Ms. Baldwin's numerous videos involve subject matters that are of private concern.

82. Ms. Baldwin's publications portray Mrs. Black and Mr. Dozier as engaging in pedophilia, kidnapping, other criminal activity, being dishonest in their personal and professional lives, engaging in fraudulent and illegal acts, and conducting their business affairs unethically, all of which holds Plaintiffs up to public hatred, contempt, ridicule and disgrace.

83. Gracie Baldwin has repeatedly told Defendant that her allegations of sexual interaction with Mr. Dozier were completely false and has sworn to this in a declaration filed with this Court.

84. Gracie Baldwin repeatedly told Defendant that her allegations of free gifts and grooming were completely false.

85. Despite her daughter informing her of the falsity of her statements, Defendant posted defamatory statements to the public on the social media platform TikTok with knowledge that the statements contained throughout the videos were false and defaming at the time they were made.

86. The false allegations plainly suggest sexual activity and are actionable pursuant to T.C.A. §29-24-101.

87. As a direct and proximate result of Defendant's cumulative and unending stream of videos, Plaintiffs have suffered significant injury to their standing in the community, humiliation, significant emotional distress, and harm to their reputation in their trade, business, and means of livelihood.

88. Ms. Baldwin published numerous videos concerning Mrs. Black and Mr. Dozier in which she claimed that they had kidnapped Grace, that they were "grooming" her, that they were holding her against her will, and that they were dangerous.

89. Ms. Baldwin published numerous videos claiming that Mr. Dozier was a pedophile and that he was dangerous.

90. Those allegations are false, have placed Mrs. Black and Mr. Dozier in a false light. The characterization of being a kidnapper, pedophile, or groomer is highly offensive to a reasonable person.

91. Ms. Baldwin knew that her allegations were completely false because her daughter, Gracie, informed her of the same. Her fabrication concerned alleged events outside of her presence, even if true.

92. Ms. Baldwin knew that her allegations were completely false or acted in reckless disregard as to the falsity of the videos and the false light in which those videos placed Plaintiffs.

93. Plaintiffs have suffered injury to their reputation, humiliation and emotional distress.

**COUNT III - DEFAMATION BY IMPLICATION OR INNUENDO**

94. Defendant published highly offensive statements that reasonably conveyed the message that Mr. Dozier and Mrs. Black are kidnappers, pedophiles, groomers, and members of a cult.

95. Defendant's videos are in the public arena.

96. The Defendant omitted facts which, if accurately presented, would not have created a negative impression of the Plaintiffs.

97. By publishing incomplete statements of and concerning the Plaintiffs, Defendant committed defamation by implication or innuendo.

98. As a direct and proximate result of Defendant's omissions and publications, Plaintiffs have suffered damages, impairment of their reputation in the community, personal humiliation, mental anguish, and suffering.

**COUNT IV – INVASION OF PRIVACY BY INTRUSION UPON SECLUSION**

99. Defendant intentionally intruded upon Plaintiffs' private affairs or concerns by posting on social media false details of Gracie's history and her relationship with Mrs. Black and Mr. Dozier.

100. Defendant intentionally intruded upon Plaintiffs' private affairs or concerns by posting on social media the details of Mrs. Black's daughters' lives.

101. Defendant knew that the information was not open to public inspection, was not public information, and was private.

102. Defendant's intrusions upon the Plaintiffs' private affairs or concerns are highly offensive to a reasonable person and, as a result, Plaintiffs have been damaged.

**COUNT V – INTENTIONAL INTERFERENCE WITH BUSINESS RELATIONSHIPS**

103. Plaintiffs Mrs. Black and Mr. Dozier had business relationships and prospective business relationships with customers and third parties.

104. Defendant was aware of the relationships between Plaintiffs, their customers, and third parties, as demonstrated by her continually using the hashtags #ASEA and #nashvilleattorney.

105. Defendant knew that customers and prospective customers were likely to utilize the internet to research and potentially purchase Plaintiffs' goods and services.

106. Defendant maliciously intended to induce the termination of the business relationships and prospective business relationships.

107. As a proximate result of Defendant's actions, the business relationships and prospective business relationships were terminated or never started, and Plaintiffs were damaged.

#### DAMAGES

108. Plaintiff Pepper Black has sustained precisely the damages described as recoverable for intentional infliction of emotional distress in *Rogers v. Louisville Land Co.*, 367 SW 3d 196, (S. Ct. 2012) She suffers from physical manifestations of emotional distress which constitutes proof of serious mental injury. These include nightmares, insomnia and depression for which she has sought psychiatric treatment, anxiety, crying, shame, humiliation, embarrassment, anger, chagrin and wrong. She has sought care in emergency rooms, the cost of which will be shown at trial.

109. These symptoms have persisted because Ms. Baldwin has continued in her abusive conduct for many months, intending to cause harm. The extreme and outrageous character of the Defendant's conduct is itself important evidence of serious mental injury.

110. This outrageous behavior has significantly damaged Mrs. Black's daily functioning and her ability to earn money. Her work requires that she organize and motivate others in the sale of her company products. The relentless characterization of her work as a



"cult" together with the humiliation, depression and loss of sleep caused by it has forced her from this business, which depends on personal relationships and enthusiasm. Defendant has substantially disrupted the operation of her business. She has lost at least \$100,000.00 in income and this loss increases daily. Ms. Baldwin has announced that she will never quit this odious behavior. This Court should put a stop to it.

111. Plaintiff Brad Dozier has experienced significant emotional distress and humiliation by being falsely and shamelessly branded a pedophile, a groomer and a kidnapper. Emotional distress constitutes damages in all defamation claims.

**INJUNCTIVE RELIEF**

112. This Court may enter a temporary injunction pursuant to Tenn. R. Civ. P. 65.04 as facts that will be adduced in the hearing will demonstrate that Plaintiffs' rights to be free from harassment, continued emotional distress and false light are being and will continue to be violated by Defendant, and Plaintiffs will suffer immediate and irreparable injury, loss or damage pending a final judgment if not enjoined.

113. Plaintiffs seek an injunction directing Defendant to remove all of the videos from her TikTok site that involve her allegations against Plaintiffs, and prohibiting Defendant from publishing further videos about them.


**PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiffs prays as follows:

1. That Defendant Theresa Baldwin be required to answer or otherwise plead within the time required by law;
2. That a jury be empaneled to try all issues so triable;
3. That judgment be had against Theresa Baldwin for compensatory damages of \$1,000,000.00 and \$2,000,000.00 in punitive damages.
4. That Defendant be permanently enjoined from the malicious campaign of false and deceitful publication; and
5. That Plaintiffs be awarded such additional, general relief to which they may be entitled.

Respectfully submitted,

THE BLACKBURN FIRM, PLLC

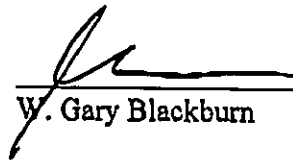
  
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**CERTIFICATE OF SERVICE**

I certify that a true and exact copy of the foregoing was served via electronic mail and U.S. Mail postage prepaid to the following:

Daniel Horwitz, Esq.  
4016 Westlawn Drive  
Nashville, TN 37209  
dani

This 10th day of April, 2023.

  
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W. Gary Blackburn