

COMPOSITE EXHIBIT A

*Copies of “all process, pleadings, and orders served upon” Defendant
Google in the State Court Action.*

IN THE SUPERIOR COURT OF FULTON COUNTY, GEORGIA
136 PRYOR STREET, ROOM C-103, ATLANTA, GEORGIA 30303
SUMMONS

) Case	2021CV355994
<i>PATRICK AMADASEW</i>) No.:	_____
Plaintiff,))
vs.))
))
<i>GOOGLE, INC.</i>))
Defendant))
))
))
))

TO THE ABOVE NAMED DEFENDANT(S):

You are hereby summoned and required to file electronically with the Clerk of said Court at <https://efilega.tylerhost.net/ofsw eb> (unless you are exempt from filing electronically) and serve upon plaintiff's attorney, whose name and address is:

*PATRICK AMADASEW
10990 GALEN PLACE
JOHNS CREEK, GA. 30097*

An answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service; unless proof of service of this complaint is not filed within five (5) business days of such service. Then time to answer shall not commence until such proof of service has been filed. **IF YOU FAIL TO DO SO, JUDGMENT BY DEFAULT WILL BE TAKEN AGAINST YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT.**

10/25/2021
This _____ day of _____, 20 _____

Honorable Cathelene "Tina" Robinson
Clerk of Superior Court
By *Jaimel Thompson*
Deputy Clerk

To defendant upon whom this petition is served:
This copy of complaint and summons was served upon you _____, 20 _____

Deputy Sherriff

**IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA**

**PATRICK AMADASUN,
Plaintiff,**

v.

**GOOGLE, INC.,
Defendant**

Jury Trial Requested

Civil Action No.

2021CV355994

COMPLAINT FOR DAMAGES

COMES NOW Plaintiff, PATRICK AMADASUN, in the above-styled action, and hereby files this, Plaintiff's Complaint and respectfully shows this Honorable Court the following facts:

Jurisdiction, Venue, and Parties

1. This Court has jurisdiction over Defendant, Google, Inc., which operates its business in Georgia. Venue is also proper in this Court since Defendant carry on business in Fulton County. This Court has subject matter jurisdiction over this matter.
2. Defendant, Google, Inc., is a Foreign Limited Liability Company with a registered agent for service of process of Corporation Service Company, 2 Sun Court, Suite 400, Peachtree Corners, Gwinnett County, Georgia 30092. Defendant, Google, Inc., may be served at that address.

Statement of Facts

3. On or around November 25, 2020, and at about 5.50am, 7.08am, and 6.54pm, the Defendant, Google, Inc., sent emails to Plaintiff, Patrick Amadasun, and stated in the emails that Plaintiff, Patrick Amadasun's account is suspended, and that he is a "Fraudster" and that Plaintiff's account was shut down due to fraudulent activities.
4. These same emails from Defendant, Google, Inc., were seen and read by various employees of Plaintiff, Patrick Amadasun.
5. On or around November 25, 2020, at about 6.55am, 7.08am and 9.49pm; and on November 30, 2020 at about 4.24am, Plaintiff sent reply emails to the Defendant, Google, Inc., requesting that the Defendant should provide information that were facts or basis that enabled the Defendant, Google, Inc., to characterize and label Plaintiff, Patrick Amadasun as a "Fraudster".
6. Defendant, Google, Inc., refused to respond to Plaintiff's email and repeated request to amend or refute this injurious statement made about Plaintiff, Patrick Amadasun. Rather than rescind this statement, the Defendant, Google, Inc., doubled down and tenaciously, resolutely,

maliciously, and recklessly affirm its defamatory and libelous characterization of Plaintiff as a fraudster in its email dated November 25, 2020, at about 6.54pm.

7. Defendant's, Google, Inc., characterization of Plaintiff, Patrick Amadasun, as a Fraudster is defamatory and libelous, and is malicious and reckless.

8. Plaintiff, Patrick Amadasun, is an author and a responsible business person, and whose published books are being considered for nomination of the Nobel Prize in Economics, and, also in Biology and Medicine; and such characterization of Plaintiff has caused an irreparable injury to Plaintiff.

9. Defendant, Google, Inc., has no basis to state that Plaintiff, Patrick Amadasun, is a fraudster.

10. As a result of Defendant's defamatory and libelous characterization of Plaintiff, Patrick Amadasun, as a Fraudster; Plaintiff, Patrick Amadasun has suffered an irreparable injury and only monetary damages could help to cure this injury.

Count 1
Defamation - Libel

11. The preceding paragraphs are hereby incorporated by reference as if set forth herein.

12. The Defendant made a false and malicious statement intended to injure the reputation of Plaintiff, Patrick Amadasun, to public hatred, contempt, or ridicule.

13. The Defendant made a false and malicious statement when it characterized Plaintiff, Patrick Amadasun, as a Fraudster in its email to him that was seen by Plaintiff's employees. The Defendant had no basis other than to subject Plaintiff, Patrick Amadasun, to public hatred, contempt, and ridicule.

14. The characterization of fraudster sent in the email by the Defendant is not supported by any factual allegation.

Count 2
Punitive Damages

15. The preceding paragraphs are hereby incorporated by reference as if set forth herein.

16. Defendant's conduct showed malice, fraud, and the entire want of care that would show a conscious indifference to the consequences pursuant to O.C.G.A. § 51-12-5.1(b).

17. Accordingly, Plaintiff, Patrick Amadasun, is entitled to punitive damages.

Count 3

Attorney's Fees and Expenses of Litigation pursuant to O.C.G.A. § 13-6-11

18. The preceding paragraphs are hereby incorporated by reference as if set forth herein.
19. The Defendant's defamatory statement has caused the Plaintiff unnecessary trouble and expense.
20. The Plaintiff is entitled to Attorney's Fees and Expenses of Litigation pursuant to O.C.G.A. § 13-6-11.

Count 4

Injunction

21. The preceding paragraphs are hereby incorporated by reference as if set forth herein.
22. The Plaintiff is seeking an order enjoining the Defendant from making libelous statements against the Plaintiff and to remove the false defamatory statements it made online and through emails.
23. The Plaintiff has already suffered from irreparable injury to its reputation and will continue to suffer irreparable harm if the statements are not removed. There is no remedy at law that will prevent such continuous harm to Plaintiff's reputation.

Count 5

Defamation Per Se

24. The preceding paragraphs are hereby incorporated by reference as if set forth herein.
25. Defendant's false defamatory statement imputed a crime punishable by law on Plaintiff. Defendant's defamatory statement imputes that the Plaintiff is a fraudulent individual that maintains a fraudulent account. It is per se defamation pursuant to O.C.G.A. § 51-5-4(a)(1) because it implies that Plaintiff is committing a crime of fraud.
26. Defendant's false defamatory statement expressly charges Plaintiff in reference to its reputation as a published author and a businessman, and it was expressly calculated to injure the reputation of Plaintiff, Patrick Amadasun. This is per se defamation pursuant to O.C.G.A. § 51-5-4(a)(3).

Prayer for Relief


WHEREFORE, Plaintiff demands and prays for the following relief:

- a) Award to plaintiff;

b) Judgment against Defendant in excess of \$5.0 million for the damages suffered to Plaintiff's reputation, particularly since the Defendant has committed a per se violation, and damage is inferred pursuant to O.C.G.A. § 51-5-4.

c) Punitive damages pursuant O.C.G.A. § 51-12-5.1(b).

e) Judgment against Defendant for any and all other relief that this Court finds necessary and appropriate.

Respectfully Submitted By: 

Dated: October 25, 2021

Patrick Amadaşun

Plaintiff

10990 Galen Place

Johns Creek, Georgia 30097

Phone: 678 522 5534

Email: amada410@yahoo.com

CERTIFICATE OF SERVICE

I hereby certify that I have on this 17th day of August, 2021, served the following Plaintiff's Complaint by United States Post Service and Mailed to:

Google, Inc.
C/O Corporation Service Company
2 SUN COURT, Suite 400,
Peachtree Corners, Georgia 30092

This 25th day of October, 2021.

Respectfully Submitted by:



Patrick Amadasun
10990 Galen Place
Johns Creek, Georgia 30097

IN THE Superior COURT OF Fulton COUNTY
STATE OF GEORGIA

P. Amadasun
Petitioner
vs
Google, Inc.
Respondent

Civil Action File No:

VERIFICATION

I, (your name) P. Amadasun, personally appeared before the undersigned Notary Public, and say under oath that I am the (check one :)

Petitioner Respondent in the above styled action and that the facts stated in the

(name of petition, motion, complaint) Complaint

are true and correct.

This the 25th day of OCT, 20 21.
[day] [month] [year]

[Signature]
(Sign your name here in front of the Notary)

Name (print or type here):

PATRICK AMADASUN

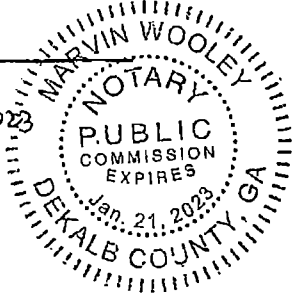
Address:

10990 GALIN PLACE
JOHNS CREEK, GA. 30097

Telephone number: 5534
(678) 522 5534

Sworn to and subscribed before me, this
25th day of OCT, 20 21.

Marvin Wooley
NOTARY PUBLIC
My Commission Expires: 1/21/2023
(Notary Seal)



Civil Action No. 2021 CV 355994
Date Filed 10/25/2021

Magistrate Court
Superior Court
State Court
Georgia, Gwinnett County

Attorney's Address
10990 GALAXY PLACE

maie PATRICK AMADARU
Plaintiff
VS.

Name and Address of party to be served.

JOHN PARK, C.A. 30077
GOOGLE, INC.
Defendant

10 CORPORATION SERVICE COMPANY
2 SUN COURT, SUITE 400, PEA-HIRSH CORNER
GWINNETT COUNTY, GEORGIA 30092
Garnishee

Sheriff's Entry Of Service

Personal I have this day served the defendant _____ personally with a copy of the within action and summons.

Notorious I have this day served the defendant _____ by leaving a copy of the action and summons at his most notorious place of abode in this County.
 Delivered same into hands of _____ described as follows
age, about _____ years; weight, about _____ pounds; height, about _____ feet and _____ inches; domiciled at the residence of defendant.

Corporation Served the defendant GOOGLE, INC. a corporation
by leaving a copy of the within action and summons with AJINHA SMITH KA
in charge of the office and place of doing business of said Corporation in this County.

Tack & Mail I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises designated in said affidavit, and on the same day of such posting by depositing a true copy of same in the United States Mail, First Class in an envelope properly addressed to the defendant(s) at the address shown in said summons, with adequate postage affixed thereon containing notice to the defendant(s) to answer said summons at the place stated in the summons.

Non Est Diligent search made and defendant _____ not to be found in the jurisdiction of this Court.

This 27 day of OCT, 2021.

SGT A. Collins, SO 500
Deputy

Sheriff Docket _____ Page _____

Gwinnett County, Georgia

WHITE: Clerk CANARY: Plaintiff / Attorney PINK: Defendant

Fulton County Superior Court

FILEDJD

Date: 11/15/2021 9:44 AM

Cathelene Robinson, Clerk

Civil Action No. 2021 CV 355994

Date Filed 10/25/2021

Magistrate Court
Superior Court
State Court

Georgia, Gwinnett County

Attorney's Address

10990 GALEN PLACE

JOHNS CREEK, GA. 30097

Name and Address of party to be served.

~~10 CORPORATION SERVICE COMPANY~~

~~250 COURT, SUITE 1400, PEACHTREE CORNER~~

~~GWINNETT COUNTY, GEORGIA 30092~~

naie PATRICK AMADASEN Plaintiff

VS.

GOOGLE INC Defendant

Defendant

Garnishee

Sheriff's Entry Of Service

Personal

I have this day served the defendant _____ personally with a copy of the within action and summons.

Notorious

I have this day served the defendant _____ a copy of the action and summons at his most notorious place of abode in this County.

Delivered same into hands of _____ described as follows age, about _____ years; weight, about _____ pounds; height, about _____ feet and _____ inches, domiciled at the residence of defendant.

Corporation

Served the defendant GOOGLE, INC. a corporation by leaving a copy of the within action and summons with Aisha Smith R.A in charge of the office and place of doing business of said Corporation in this County.

Tack & Mail

I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises designated in said affidavit, and on the same day of such posting by depositing a true copy of same in the United States Mail, First Class in an envelope properly addressed to the defendant(s) at the address shown in said summons, with adequate postage affixed thereon containing notice to the defendant(s) to answer said summons at the place stated in the summons.

Non Est

Diligent search made and defendant not to be found in the jurisdiction of this Court.

This 27 day of OCT, 2021

SGT. A. Collins, SO 500 Deputy

Sheriff Docket _____ Page _____

Gwinnett County, Georgia

WHITE: Clerk

CANARY: Plaintiff / Attorney

PINK: Defendant

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