



CJ-17-7175

FILED IN DISTRICT COURT
OKLAHOMA COUNTY

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

DEC 20 2017

DENNIS SMITH,
TODD ARNOLD,

PLAINTIFFS,

v.
NATIONAL LITIGATION LAW GROUP
PLLC, also known as NLLG

FREEDOM DEBT RELIEF, LLC,

DEFENDANTS.

RICK WARREN
COURT CLERK
73_____

CJ-~~017~~-2017-7175

PETITION

COME NOW THE PLAINTIFFS, and for their cause of action herein allege and state as follows:

PARTIES

1. The Plaintiffs are:
 - A. Dennis Smith an adult resident of Oklahoma County, Oklahoma, and
 - B. Todd Arnold, an adult resident of Canadian County, Oklahoma.
2. The Defendants are:
 - A. National Litigation Law Group PLLC (also known as NLLG), a business entity organized in Oklahoma and headquartered in Oklahoma County and doing business in Oklahoma County, and
 - B. Freedom Debt Relief, LLC, (hereafter "Freedom") an entity doing business in Oklahoma.
3. Each Plaintiff was an employee of NLLG working in Oklahoma County, Oklahoma, working as a Director for Defendant until their constructive discharge on or about October 24, 2017.

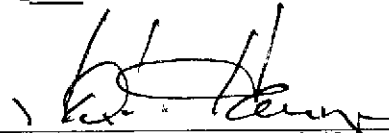
4. In the late spring or early summer of 2017, the Plaintiffs learned that the Defendants were engaged in activities that the Plaintiffs reasonably understood to be the unlawful practice of law, part of which involved the use of each Plaintiff's name and/or bar number without the knowledge and consent of the Plaintiffs and without the Plaintiffs' knowledge of the dispute, or of the claimed clients.
5. As a result of these actions, each Plaintiff has disassociated himself from NLLG.
6. Each Plaintiff has been injured in that NLLG, without either Plaintiff's consent, provided Freedom with names and bar numbers of attorneys including, but not limited to, the Plaintiffs, specifically for the purpose of allowing the two entities to utilize the identities of the Plaintiffs for the unauthorized practice of law and to further the economic interests of the entities.
7. Such use of each Plaintiff's name occurred as a matter of business practice multiple times per day and is a fraudulent misappropriation of each Plaintiff's name contrary to the "Right of Publicity" adopted in Oklahoma in *McCormack v. Oklahoma Publishing Co.*, 1980 OK 98, 613 P.2d 737 and the statutory right of publicity codified at 12 O.S. §1449(A).
8. Such use has occurred multiple times, and each use is claimed as a separate violation.
10. Because this misuse was willful, intentional, and fraudulent, then in addition to such damages as are otherwise shown, each Plaintiff is entitled to punitive damages in the amounts provided and allowed by law.
11. As the result of such wrongful constructive discharge, each Plaintiff has

suffered damages in the form of lost earnings past, present, and future, emotional distress, and other consequential damages which should be valued in a sum in excess of Seventy Five Thousand Dollars (\$75,000.00) for each Plaintiff.

12. Because the conduct of the Defendant is willful, wanton, and in bad faith, each Plaintiff is entitled to an award of punitive damages in the amount provided by law.

WHEREFORE, the Plaintiffs pray that they be individually awarded damages against Defendants for all actual and compensatory losses, including future earnings, interest, and costs, and that each Plaintiff be awarded punitive damages.

RESPECTFULLY SUBMITTED THIS 20^T DAY OF DECEMBER, 2017.



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