

AOC-105 Doc. Code: CI
Rev. 1-07 12/16/2008 03:27 pm
Page 1 of 1 Ver. 1.02
Commonwealth of Kentucky
Court of Justice www.courts.ky.gov
CR 4.02; CR Official Form 1



CIVIL SUMMONS

080113491
Case No. 08-C-
Court Circuit District
County Jefferson

ROBERT E. SALYER

PLAINTIFF
JEFFERSON CIRCUIT COURT
DIVISION FOUR (4)

VS.

THE SOUTHERN POVERTY LAW CENTER, INC.
AGENT: TEENIE HUTCHISON
400 WASHINGTON AVENUE
MONTGOMERY, Alabama

DEFENDANT

RECEIVED

DEC 23 2008

SECRETARY OF STATE
COMMONWEALTH OF KY

Service of Process Agent for Defendant:

KENTUCKY SECRETARY OF STATE

SERVE AGENT: TEENIE HUTCHISON

400 WASHINGTON AVENUE

MONTGOMERY, AL 36104

**THE COMMONWEALTH OF KENTUCKY
TO THE ABOVE-NAMED DEFENDANT(S):**

You are hereby notified a **legal action has been filed against you** in this Court demanding relief as shown on the document delivered to you with this Summons. **Unless a written defense is made by you or by an attorney on your behalf** within **20 days** following the day this paper is delivered to you, judgment by default may be taken against you for the relief demanded in the attached Complaint.

The name(s) and address(es) of the party or parties demanding relief against you are shown on the document delivered to you with this Summons.

Date: DEC 18 2008, 2

David L. Nicholson Clerk
By: [Signature] D.C.

Proof of Service

This Summons was served by delivering a true copy and the Complaint (or other initiating document) to:

this ____ day of _____, 2____.

Served by: _____
_____ Title

AOC-105 Doc. Code: CI Rev. 1-07 12/16/2008 03:27 pm Page 1 of 1 Ver. 1.02 Commonwealth of Kentucky Court of Justice www.courts.ky.gov CR 4.02; CR Official Form 1		Case No. 08-G-13421 Court <input checked="" type="checkbox"/> Circuit <input type="checkbox"/> District County Jefferson
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CIVIL SUMMONS

ROBERT E. SALYER

PLAINTIFF
 JEFFERSON CIRCUIT COURT
 DIVISION FOUR (A)

vs.

THE SOUTHERN POVERTY LAW CENTER, INC.
 AGENT: TEENIE HUTCHISON
 400 WASHINGTON AVENUE
 MONTGOMERY, Alabama

DEFENDANT

RECEIVED

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400 WASHINGTON AVENUE

MONTGOMERY, AL 36104

THE COMMONWEALTH OF KENTUCKY
TO THE ABOVE-NAMED DEFENDANT(S):

You are hereby notified a **legal action has been filed against you** in this Court demanding relief as shown on the document delivered to you with this Summons. **Unless a written defense is made by you or by an attorney on your behalf** within **20 days** following the day this paper is delivered to you, judgment by default may be taken against you for the relief demanded in the attached Complaint.

The name(s) and address(es) of the party or parties demanding relief against you are shown on the document delivered to you with this Summons.

Date: DEC 18 2008, 2

By: *Dennis L. Nicholson* Clerk
[Signature] D.C.

Proof of Service	
This Summons was served by delivering a true copy and the Complaint (or other initiating document) to:	

this _____ day of _____, 2_____.	
Served by: _____	_____
_____	Title

08CI 13421

COMMONWEALTH OF KENTUCKY

JEFFERSON CIRCUIT COURT
CIVIL ACTION NO. 08-CI-_____
DIVISION ____

JEFFERSON CIRCUIT COURT
DIVISION FOUR (4)

ROBERT E. SALYER

PLAINTIFF

VS.

THE SOUTHERN POVERTY LAW CENTER, INC.
400 WASHINGTON AVENUE
MONTGOMERY, ALABAMA 36104

DEFENDANT

COMPLAINT

Comes now the plaintiff, by counsel, and for his cause of action herein states as follows:

1. The plaintiff, Robert E. Salyer, was at relevant times herein an attorney residing in Louisville, Kentucky.
2. The defendant, The Southern Poverty Law Center, Inc., is located in Montgomery, Alabama and publishes on the internet and otherwise a document styled "Intelligence Project" or "Intelligence Report." Said publication having been made on July 15, 2008 and on other dates thereafter and on several dates prior to July 15, 2008.
3. It is believed that said report existed for approximately 2 years in which it published defamatory statements about the plaintiff Robert E. Salyer. Said statements included but not limited to references that the plaintiff had been disbarred from practicing in military courts and also that he had received a dishonorable discharge.
4. Both of these statements are false and defamatory and constitute defamation

COPY
 ATTEST: DAVID L. MCHOLSON, CLERK
 JEFFERSON CIRCUIT COURT
 LOUISVILLE, KENTUCKY
 BY _____ D.C.

per se in that they were statements that damaged plaintiff's business reputation.

5. That the defendant acted toward the plaintiff with actual malice and with reckless disregard of the truth.

6. Said statements are not privileged.

7. That as a direct and proximate result of the defamatory statements, the plaintiff has been damaged as follows:

- a. Damage to his reputation,
- b. Emotional distress,
- c. Embarrassment and humiliation

8. Plaintiff is entitled to recover compensatory damages that will fairly and adequately compensate him for the injuries as herein alleged.

9. The plaintiff is entitled to a retraction of the defamatory statements.

10. That the plaintiff is entitled to recover punitive damages.

WHEREFORE, plaintiff demands judgment as follows:

1. Judgment that will fairly and adequately compensate the plaintiff for the damages herein alleged as well as judgment for punitive damages and a judgment requiring a retraction.

2. That the plaintiff be accorded such other relief to which he may appear entitled including his costs expended, attorney fees, if applicable, and a trial by jury on all issues so triable.

CARROLL & TURNER, P.S.C.
ATTORNEYS AT LAW
56 COURT STREET
MONTICELLO, KY 42633
Telephone: (606) 348-9767
Facsimile: (606) 348-3459
E-mail: tcarr51@windstream.net

BY: 

THOMAS E. CARROLL



Trey Grayson
Secretary of State

**Commonwealth of Kentucky
Office of the Secretary of State**

Summons Division
PO BOX 718
FRANKFORT, KY 40602-0718
Phone: (502) 564-3490
Fax: (502) 564-1484

December 23, 2008

THE SOUTHERN POVERTY LAW CENTER, INC.
SERVE: TENNIE HUTCHISON, AGENT
400 WASHINGTON AVE.
MONTGOMERY, AL 36104

FROM: SUMMONS DIVISION
SECRETARY OF STATE

RE: CASE NO: 08-CI-13421

COURT: Circuit Court Clerk
Jefferson County, Division: 4
600 West Jefferson St.
Louisville, KY 40202
Phone: (502) 595-3055

Legal action has been filed against you in the captioned case. As provided under Kentucky law, the legal documents are enclosed.

Questions regarding this action should be addressed to:

- (1) Your attorney, or**
- (2) The attorney filing this suit whose name should appear on the last page of the complaint, or**
- (3) The court or administrative agency in which the suit is filed at the clerk's number printed above.**

The Kentucky Secretary of State has NO POWER to make a legal disposition of this case. Your responsive pleadings should be filed with the clerk of the court or agency where the suit is filed and served directly on your opposing party.

No copy of future pleadings need be sent to this office unless you wish us to serve the pleading under a particular statute or rule and pay for said service.