

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION

CARMEISHA WILLIAMS and CORY  
WILLIAMS, individually, and as  
Parents and Next Friends of S.W. and as  
Administrators of the Estate of S.W.,

Plaintiffs,

v.

ELBA CITY BOARD OF  
EDUCATION; DR. WARREN  
WEEKS, individually; WYNN  
GRIMES, individually;

Defendants.

Case No.: 2:25-CV-00607

JURY TRIAL DEMANDED

**PRELIMINARY STATEMENT**

1. This civil rights action arises from a tragedy that could have been prevented: the death of S.W., a 14-year-old mixed-race student at Elba High School by suicide on August 9, 2023, after enduring persistent bullying, harassment, and discrimination based on gender identity, sexual orientation, race, and mental health status. Despite knowledge of S.W.'s bullying and hospitalization for psychiatric care, Defendants demonstrated deliberate indifference to S.W.'s suffering and failed to take appropriate action to protect them from harassment.

2. The conduct of school officials reflects more than indifference and rises to the level of intentional discrimination against a marginalized child. Defendants' inaction over several years stands in stark contrast to their normal practice of enforcing anti-bullying and student harassment policies for other students. Defendants made a conscious decision not to remedy the harassment directed at S.W., motivated by their knowledge of S.W.'s protected characteristics - race, gender identity, sexual orientation, and mental health disability.

3. Finally, On August 8, 2023, the day before S.W.'s death, Defendant Weeks, the Principal at Elba High School, screamed at S.W. in front of approximately 50 students and forcibly removed a hoodie that S.W. wore in order to conceal self-inflicted scars on their body. When the hoodie was removed, the scars were visible, as well as the outline of S.W.'s breasts under a tank top. Weeks forced S.W. to attend classes for a day in an emotionally devastated state. S.W.'s death by suicide the next day is a proximate cause of Weeks' cruelty and is a tort of outrage under Alabama law and a violation of S.W.'s substantive due process rights under §1983.

### **JURISDICTION AND VENUE**

4. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1331 (federal question jurisdiction) and 28 U.S.C. § 1343(a)(3) and (4) (civil rights jurisdiction). This action arises under Title IX of the Education Amendments of

1972, 20 U.S.C. § 1681 et seq., Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq., Title II of the Americans with Disabilities Act, 42 U.S.C. § 12131 et seq., Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794, and 42 U.S.C. § 1983. This Court has supplemental jurisdiction over Plaintiffs' state law claims pursuant to 28 U.S.C. § 1367.

5. Venue is proper in the Middle District of Alabama, Southern Division, pursuant to 28 U.S.C. § 1391(b), because all Defendants reside within this judicial district and the events or omissions giving rise to the claims occurred entirely within this district.

6. There are no applicable administrative exhaustion requirements.

### **PARTIES**

7. Plaintiff Carneisha Williams is the mother of S.W. She is a resident of Coffee County, Alabama. She brings this action both individually and as next friend of her deceased minor child, and as Co-Administrator of S.W.'s Estate.

8. Plaintiff Cory Williams is the father of S.W. He is a resident of Coffee County, Alabama. He brings this action both individually and as next friend of his deceased minor child, and as Co-Administrator of S.W.'s Estate.

9. S.W. (“S.W.”) was, at all times relevant to this action, a minor child born on August 30, 2008, and a student at Elba High School until their death on August 9, 2023.

10. Defendant Elba City Board of Education is a public school board organized under the laws of the State of Alabama, that operates Elba High School and is responsible for establishing and implementing policies, practices, and procedures for the school system.

11. Defendant Dr. Warren Weeks was the Principal of Elba High School during the 2023-2024 school year and part of the 2024-2025 school year, having been hired on July 3, 2023. As Principal, he exercised final decision-making authority with respect to the administration of discipline at the High School as well as the enforcement of anti-bullying and anti-discrimination policies. Weeks is also sued in his individual capacity.

12. Defendant Wynn Grimes was the Principal of Elba High School during the 2021-2022 and 2022-2023 school years. As Principal, he exercised final decision-making authority with respect to the administration of discipline at the High School as well as the enforcement of anti-bullying and anti-discrimination policies. Grimes is also sued in his individual capacity.

## **STATEMENT OF FACTS**

### **Background and Early Harassment**

13. S.W. was born on August 30, 2008, and was a mixed-race student at Elba High School.

14. During their seventh-grade year (2021-2022), S.W. came out as gay and requested to be called “Shane” and addressed with “they/them” pronouns.

15. Beginning in elementary school around 2018-2019, S.W. had already faced verbal racial harassment from white students for a mixed-race identity.

16. Following S.W.'s disclosure of a transgender identity in seventh grade, harassment and ridicule from students only intensified. Teachers refused to use S.W.'s preferred name or preferred pronouns, despite an absence of school policies precluding them from doing so.

17. S.W.'s classmates regularly rolled their eyes, mocked S.W., and laughed at S.W.'s naming preferences.

18. S.W. was further bullied and mocked for assuming traditionally male appearance in terms of manner of clothing and hairstyle

19. Multiple teachers, including Ms. Johnson (English teacher) and Ms. Spicer (science teacher), actively participated in the harassment by mocking and belittling S.W.'s gender identity naming requests.

20. Principal Grimes and upon information and belief other school administrators learned of a suicide attempt and subsequent hospitalization of S.W. for mental health reasons.

21. Defendants Weeks and Grimes had actual knowledge of S.W.'s sexual orientation, gender identity, and mental health struggles, which were widely known and gossiped about throughout the school community.

22. Defendants Weeks and Grimes had actual knowledge that S.W. was being bullied by students and teachers based on sexual orientation, gender identity, disability, given the prevalence and widespread discussion in school circles of this conduct.

23. Defendants refused to remedy students' bullying of S.W. based on sexual orientation, gender identity, and disability.

24. Defendants were deliberately indifferent to students' bullying of S.W. based on sexual orientation, gender identity, and disability.

25. Defendants refused to remedy teachers' bullying of S.W. based on sexual orientation, gender identity, and disability despite their routine enforcement of other anti-bullying provisions in the Elba City Schools disciplinary code.

26. Defendants were deliberately indifferent to teachers' bullying of S.W. based on sexual orientation, gender identity, and disability.

**Elba City Schools' Normal Routine of Enforcing Anti-Bullying Policies**

27. Elba City Schools maintained a policy and practice of enforcing its anti-bullying policies for white, non-disabled, straight, and gender-conforming students.

28. The school district codified in its handbook procedures for investigating bullying complaints and implementing safety measures as required by Alabama state law.

29. For white, non-disabled, straight, and gender-conforming students, Defendants routinely enforced anti-bullying and student harassment policies, conducted investigations of reported incidents, took appropriate disciplinary action against harassers, and provided protection from known risks of harm.

30. For a non-white, disabled, and LGBTQ students like S.W. however, officials at Elba High manifested a widespread practice over a multiyear period of not enforcing its anti-bullying policies. Weeks and Grimes in their roles as principals further acted as final decisionmakers regarding the administration of discipline at the High School as well as the enforcement of anti-bullying and anti-discrimination policies.

**Defendants' Pervasive Practice of Failing to Protect S.W.**

31. Over a multiyear period from 2018 through 2023, Defendants maintained a pervasive practice and policy of not protecting S.W. from bullying and harassment, in stark contrast to their normal routine of enforcing anti-bullying and student harassment policies for white, non-disabled, straight, and gender-conforming students.

32. This differential treatment constituted a conscious decision not to remedy the harassment directed at S.W. and was motivated by Defendants' knowledge of S.W.'s protected characteristics—race, gender identity, sexual orientation, and disability.

**Alabama's Anti-Bullying Law and Defendants' Ministerial Duties**

33. Alabama's Anti-Bullying law, Code of Ala. § 16-28B-4(c), requires: “Any student, or parent or guardian of the student, who is the object of bullying may file a complaint outlining the details of the bullying, on a form authorized by the local board, and submit the form to the official designated by the local board to receive complaints at the school. A copy of the form shall be prominently posted and accessible on the website of each local board of education and school, shall be available at each school office, and shall be included in the student handbook that is distributed to each student at the beginning of each school year.”

34. Despite clear statutory requirements, Elba High School did not post, and does not currently post, a bullying complaint form on its website nor provide the form in the student handbook distributed to students during the 2021-2022, 2022-2023, and 2023-2024 school years.

35. Defendants Weeks and Grimes had a ministerial duty under Alabama law to provide bullying reporting forms on the school's website and in the school's student handbook and failed that duty.

36. Bullying complaint forms were instead kept under lock and key in the principal's office.

37. During his tenure as principal, Defendant Grimes was the sole individual with access to the complaint forms and ability to provide the complaint forms to students or parents.

38. During his tenure as principal, Defendant Weeks was the sole individual with access to the complaint forms and ability to provide the complaint forms to students or parents.

39. Elba City Schools maintains Reporting, Investigation, and Complaint Resolution Procedures that state: "Complaints alleging violations of this policy must be made on approved complaint forms available at the principal's and or counselor's office. The complaint must be signed by the student alleging the violation or by the student's parent or legal guardian and delivered to the principal or the principal's designee either by mail or personal delivery."

40. The policy further provides that "the principal or the principal's designee will, in his/her sole discretion, determine if the complaint alleges a serious violation of the policy. If the principal or the principal's designee determines that the complaint alleges a serious violation, the principal or the designee will undertake an investigation of the complaint in a reasonably prompt time period taking into account the circumstances of the complaint."

41. During his tenure as principal, Defendant Grimes, as the official decision maker with sole access to bullying complaint forms and “sole discretion” over how to investigate complaints was delegated final decision-making authority over provision of bullying complaint forms and investigation of bullying complaints and his decisions had legal effect without further action by Elba City Schools Superintendent Christopher Moseley or the Elba City Schools Board of Education.

42. During his tenure as principal, Defendant Weeks, as the official decision maker with sole access to bullying complaint forms and “sole discretion” over how to investigate complaints was delegated final decision-making authority over provision of bullying complaint forms and investigation of bullying complaints and his decisions had legal effect without further action by Elba City Schools Superintendent Christopher Moseley or the Elba City Schools Board of Education.

**S.W.’s Mental Health Crisis and Hospitalization**

43. As a result of persistent harassment and discrimination, S.W. developed serious mental health conditions, including a major depressive disorder and anxiety with suicidal ideation, and began engaging in self-harm behavior.

44. From April 4 to April 18, 2023, S.W. was hospitalized at Beacon Behavioral Hospital for mental health treatment related to suicidal ideation caused by bullying by classmates and teachers.

45. On April 20, 2023, Carneisha Williams disclosed the bullying to then-Principal Wynn Grimes, explicitly informing him that S.W. had been hospitalized for suicidal ideations due to bullying by students named “J.J.” and “K.C.” She told Grimes that “something needs to be done to the children who have been talking about S.W..”

46. Despite this clear notice that S.W. was experiencing a mental health crisis, Defendant Grimes made a conscious decision not to remedy the harassment and took no meaningful action.

47. Defendant Grimes had a ministerial duty to provide Carneisha Williams with a bullying reporting form when they reported that S.W. was being bullied but failed to do so.

48. The school failed to provide S.W. or their parents with bullying reporting forms, as required under Alabama's anti-bullying law, Code of Ala. § 16-1-23 et seq., despite being told S.W. was being bullied and was suicidal. Principal Grimes, who had sole access to the bullying reporting forms, did not provide Carneisha Williams with a reporting form, despite being informed that S.W. was suicidal, or even inform the family of a reporting process.

49. Following S.W.'s return to school after hospitalization, the harassment escalated dramatically.

50. In a stunning display of cruelty, Students mocked S.W.'s mental health status, calling them "crazy" and telling them they "should try better next time" to kill themselves.

51. At one point, when S.W. became ill and vomited from anti-anxiety medication, other students viciously accused S.W. of being pregnant.

52. These accusations of pregnancy were made in front of S.W.'s teachers.

53. Upon information and belief, Defendant Grimes had actual knowledge that S.W. was being accused of being pregnant as a result of an adverse reaction to anti-anxiety medication.

54. S.W. was mocked openly in front of other students, teachers, and administrators for their mental health status following their hospitalization.

55. At least from the point of Carneshia Williams' reporting of her child's suicide attempt and the context for it, Defendant Grimes had actual knowledge that S.W. was being mocked openly in front of other students, teachers, and administrators for their mental health status following their hospitalization.

56. In May 2023, when the Williams family attempted to withdraw S.W. from Elba City Schools to transfer to Coffee County Schools due to persistent bullying, school officials refused to allow the withdrawal.

57. A secretary in the Elba High School front office told the family that “no matter where they go, it will follow them,” which apparently meant that S.W. would be bullied in any school environment, and expressed concern about losing taxpayer dollars if S.W. left the district.

**Superintendent Moseley's Recruitment of Defendant Weeks**

58. On July 3, 2023, Defendant Dr. Warren Weeks was hired as the new Principal of Elba High School.

59. Superintendent Moseley specifically recruited Weeks for this position despite being warned by guidance counselor Buffy Lusk that Weeks had a documented history of verbal and physical violence against students, teachers, and parents at Goshen High School.

60. Lusk specifically warned that she had been a victim of Weeks’s verbal and physical violence and had witnessed him commit similar acts against others.

61. Lusk told both Moseley and Board members that she would resign if Weeks were hired.

62. Lusk had served as a crucial source of support and informal counseling for S.W.

63. When Weeks was hired and Lusk resigned, S.W. lost a primary advocate at the school.

### **Defendant Weeks's Pattern of Targeting Nonwhite Students and Parents**

64. Throughout Weeks's tenure as principal of Elba City Schools, he maintained a pattern and practice of targeting nonwhite students and parents, repeatedly screaming at them, cursing at them, and, in one instance, goading Black male students to engage in a physical confrontation.

65. Weeks was never disciplined or fired for this discriminatory conduct, of which school district officials were aware.

66. In contrast, in November 2024, when Weeks faced harassment allegations from targeting a white female student and her mother, Weeks was terminated.

67. The school system's inaction in the context of misconduct by Weeks toward Black students demonstrates a practice of intentional discrimination against nonwhite students and/or deliberate indifference to discrimination against nonwhite students.

### **Defendant Weeks's Conscience-Shocking Conduct**

68. On August 7, 2023, S.W. returned to Elba High School and informed Defendant Weeks that they had been bullied in the school system for several years.

69. Specifically, S.W. informed Defendant Weeks that they were being bullied based on race, sexual orientation, gender identity, and mental health status.

70. Despite this knowledge and being the sole individual with access to bullying complaint forms, which were kept under lock and key in the principal's office, Defendant Weeks did not provide S.W. with a bullying complaint form.

71. Defendant Weeks had a ministerial duty to provide S.W. with a bullying reporting form when they reported they were being bullied and failed to do so. Providing S.W. with a bullying complaint form was a ministerial duty of Defendant Weeks under Alabama law that did not require the exercise of discretion.

72. Defendant Weeks was deliberately indifferent to the bullying of S.W. based on their race, sexual orientation, gender identity, and mental health status.

73. Defendant Weeks as the official decision maker with sole access to bullying complaint forms and “sole discretion” over how to investigate complaints was delegated final decision-making authority over provision of bullying complaint forms and investigation of bullying complaints and his decisions had legal effect without further action by Elba City Schools Superintendent Christopher Moseley or the Elba City Schools Board of Education.

74. On August 8, 2023, Defendant Weeks confronted S.W. in the hallway of Elba High School in the presence of approximately 50 other students as they filed into lunch.

75. Defendant Weeks screamed at S.W. about their hoodie and forcibly removed the hoodie from their body without any knowledge of whether S.W. was clothed beneath the hoodie.

76. Defendant Weeks acted with malice and willfulness in forcibly removing S.W.'s hoodie, knowing of their history of bullying, mental health struggles, and recent hospitalization for suicidal ideation. Moreover, as long as a child's face was not covered by the drawing up of a hood, school policies do not prohibit the wearing of a hoodie. At no point was S.W.'s face covered.

77. When the hoodie was forcibly removed, it was revealed that S.W. was wearing only a small tank top underneath.

78. The removal of the hoodie exposed S.W.'s self-harm scars, which were visible to the other students present.

79. Despite seeing these self-mutilation scars on S.W.'s body, Weeks took the hoodie and kept it for the entire day, forcing S.W. to attend classes in only the small tank top with their self-mutilation scars visible to all students and staff.

80. The removal of the hoodie revealed the outline of S.W.'s breasts, which were visible with only the small tank top they were allowed to wear for the rest of the day.

81. Despite actual knowledge of S.W.'s transgender status, Defendant Weeks forced them to wear clothing for the remainder of the day that revealed the outline of their breasts and did not conform with their gender identity.

82. Defendant Weeks's forcible removal of S.W.'s hoodie constituted an intentional, harmful, and offensive touching without S.W.'s consent.

83. On August 9, 2023, S.W. died by suicide, leaving behind a note that referenced the persistent bullying and harassment they had endured at school, specifically mentioning the students their parents had complained about.

84 Throughout S.W.'s time in the Elba City School system, Defendants systematically failed to: address known incidents of bullying and harassment; make bullying reporting forms required by Alabama state law available to students or parents; follow statutory requirements for handling discrimination complaints; notify parents of the severity of the situation; provide reasonable accommodations for S.W.'s documented mental health conditions; investigate complaints of staff participation in harassment; and create and maintain a safe educational environment.

**CLAIMS FOR RELIEF**

**COUNT I: VIOLATION OF TITLE IX  
(Against Defendant Elba City Board of Education)**

85. Plaintiffs incorporate by reference paragraphs 1-84 as if fully set forth herein.

86. Defendant Elba City Board of Education receives federal financial assistance and is subject to Title IX's requirements.

87. S.W. was subjected to severe, pervasive, and objectively offensive harassment based on their gender identity and sexual orientation that deprived them of access to educational opportunities and benefits.

88. Defendant had actual knowledge of the harassment through multiple direct reports from S.W. and their parents, documentation of bullying incidents, visible signs of emotional distress and self-harm, reports from teachers, and reports from counselors.

89. Defendant exercised substantial control over both the harassers and the context in which the harassment occurred.

90. Defendant acted with deliberate indifference to the known harassment by maintaining a pervasive practice of not protecting S.W. while enforcing anti-bullying policies for other students, demonstrating a conscious decision not to remedy the harassment.

**COUNT II: VIOLATION OF TITLE VI  
(Against Defendant Elba City Board of Education)**

91. Plaintiffs incorporate by reference paragraphs 1-84 as if fully set forth herein.

92. Defendant intentionally discriminated against S.W. based on race through a pervasive practice and policy of not protecting them from racial harassment while protecting other students from similar conduct.

93. This differential treatment was motivated by S.W.'s race and constituted deliberate indifference to known racial harassment.

**COUNT III: VIOLATION OF 42 U.S.C. § 1983 - EQUAL PROTECTION  
(Against All Defendants)**

94. Plaintiffs incorporate by reference paragraphs 1-84 as if fully set forth herein.

95. Defendants, acting under color of state law, intentionally discriminated against S.W. based on gender identity, sexual orientation, and race through a pervasive practice or custom of not protecting S.W. despite the existence of district policies prohibiting harassment, policies that were routinely enforced for students outside S.W.'s gender and race protected classes.

96. This differential treatment based on race and characteristics like sexual orientation and gender identity violated S.W.'s right to equal protection under the Fourteenth Amendment.

97. Defendants Weeks and Grimes in their individual capacities, directly participated in the constitutional violations through their actions and deliberately indifferent inactions. Weeks and Grimes also exercised final decision-making authority with respect to the administration of discipline at the High School as well as the enforcement of anti-bullying and anti-discrimination policies.

**COUNT IV: VIOLATION OF 42 U.S.C. § 1983 - SUBSTANTIVE DUE  
PROCESS  
(Against Defendant Weeks)**

98. Plaintiffs incorporate by reference paragraphs 1-84 as if fully set forth herein.

99. Defendant Weeks's conduct on August 8, 2023, in screaming at S.W. in front of peers and forcibly removing their hoodie without knowledge of what was underneath, exposing their self-harm scars to other students, and forcing them to remain exposed for the entire day, was arbitrary and conscience-shocking.

100. This conduct violated S.W.'s substantive due process rights under the Fourteenth Amendment.

**COUNT V: VIOLATION OF TITLE II OF THE AMERICANS WITH  
DISABILITIES ACT**

**(Against Defendant Elba City Board of Education)**

101. Plaintiffs incorporate by reference paragraphs 1-84 as if fully set forth herein.

102. S.W. was a qualified individual with a disability as defined by the ADA, having been diagnosed with major depressive disorder and other mental health conditions that substantially limited one or more major life activities.

103. Defendant discriminated against S.W. by failing to provide reasonable accommodations for their documented mental health conditions, failing to protect them from disability-based harassment, and creating a hostile educational environment based on disability.

**COUNT VI: VIOLATION OF SECTION 504 OF THE REHABILITATION  
ACT**

**(Against Defendant Elba City Board of Education)**

104. Plaintiffs incorporate by reference paragraphs 1-84 as if fully set forth herein.

105. S.W. was a qualified individual with a disability as defined by Section 504, having been diagnosed with major depressive disorder and other mental health conditions that substantially limited major life activities.

106. Defendant Elba City Board of Education receives federal financial assistance and is subject to Section 504's requirements.

107. Defendant discriminated against S.W. by failing to provide reasonable accommodations for their documented mental health conditions, failing to protect them from disability-based harassment, failing to provide appropriate mental health support services, and creating a hostile educational environment based on disability.

**COUNT VII: BATTERY (Against Defendant Weeks)**

108. Plaintiffs incorporate by reference paragraphs 1-84 as if fully set forth herein.

109. Defendant Weeks intentionally caused harmful and offensive contact with S.W. by forcibly removing their hoodie from their body without consent.

110. This contact was harmful and offensive to a reasonable person and was done without S.W.'s consent.

111. Defendant Weeks acted with the intent to cause such contact or with knowledge that such contact was substantially certain to occur.

112. As a direct and proximate result of Defendant Weeks's battery, S.W. suffered humiliation, emotional distress, and exposure of their self-harm scars to peers.

**COUNT VIII: OUTRAGE  
(Against Defendant Weeks)**

113. Plaintiffs incorporate by reference paragraphs 1-84 as if fully set forth herein.

114. Defendant Weeks engaged in extreme and outrageous conduct by screaming at S.W. in front of peers and forcibly removing their hoodie without knowledge of what was underneath, exposing their self-harm scars to other students, and forcing them to remain exposed for the entire day despite knowledge of their bullying history and mental health struggles.

115. This conduct was beyond all possible bounds of decency and must be regarded as atrocious and utterly intolerable in a civilized society.

116. Defendant's conduct caused severe emotional distress, including anxiety, depression, suicidal ideation, and ultimately, suicide.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs respectfully request that this Court enter judgment against Defendants and grant the following relief:

a. Declare that Defendants' acts and practices violated Title IX, Title VI, Title II of the ADA, Section 504, and 42 U.S.C. § 1983;

- b. Award compensatory damages to Plaintiffs for mental anguish and emotional distress, loss of companionship and society, medical and psychological treatment expenses, funeral and burial expenses, and loss of future earnings and benefits;
- c. Award punitive damages against Defendants in their individual capacities;
- d. Issue permanent injunctive relief requiring comprehensive anti-bullying and anti-discrimination policies, mandatory training for staff, and clear protocols for addressing harassment complaints;
- e. Award Plaintiffs their reasonable attorneys' fees and costs pursuant to 42 U.S.C. § 1988;
- f. Award pre-judgment and post-judgment interest as allowed by law;
- g. Grant such other and further relief as this Court deems just and proper.

Plaintiffs demand a trial by jury on all issues so triable.

Respectfully submitted this 6th day of August 2025.

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