

STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS
COUNTY OF FLORENCE) 12TH JUDICIAL CIRCUIT

DORIS BOULOS JHAR
CCCP & GS
FLORENCE COUNTY, SC

Case No.: 2021-CR-21-2063

Arie Davis,

Plaintiff,

-v.-

Frederick Hopkins, et alia,

Defendants.

ANSWER
AND

COUNTER-CLAIM WITH CROSS-CLAIMS

(JURY TRIAL DEMAND)

ANSWER (FIRST DEFENSE)

NOW COMES THE DEFENDANT, in his pro se capacity with all the righteous indignation he can muster to thwart this defenestable and odiferously stercoracious attempt by the Plaintiff and her retained counsel, an insipidly incompetent barrister, who did intentionally plagiarize a prior complaint for damages on similar grounds (all unverifiable statements attributable to their client) and, while making gross assumptions, did commence this frivolous lawsuit to extort, terrorize, defame, intimidate all the abovenamed Defendants, where ever situate, in a vain & fruitless attempt to obtain the proverbial "pot-o'-gold," muchly sought by ambulance-chasers and their greedy and feckless clientele, with a rapacious hunger for filthy lucre.

1. The Defendant summarily and emphatically denies each and every scurrilous allegation proffered by the Plaintiff and her insipidly incompetent retained counsel, to include the caudally attached prayer for relief, as well as all three (3) plagiarized causes of action for "Wrongful Death, Negligence and Gross Negligence," and specifically denies, in toto!, as to the fourth cause of action (Assault and Battery), as will be more fully set forth hereinbelow.

2. The Defendant further alleges that the Plaintiff's insipidly incompetent and intellectually challenged, retained ambulance chasing counsel did with actual malice (or implied malice) did plagiarize a prior (filed) civil action, CA# 2021-CP-21-2054, in whole (or in part), without any justification or even the slightest indication that by signing these absolutely ridiculous pleadings, while ignoring the actual, undeniable fact that she is not DEAD, but simply Alive!

3. The Defendant further alleges that Plaintiff and her counsel failed abjectly to proof read

said ridiculous pleadings before attaching his legal signature and filing same with this Honorable Court, so certifying that he has or even believes his client and him as well have good enough grounds to allege each and every allegation, and/or had good reason(s) to do so, much to his cheesy chagrin.

4. The Defendant further alleges that the pleadings are so defective as a matter of law or equity that no curative legal motion filed on behalf of his client can survive long enough to permit major editorial edits to erase the stain of the lazy scrivener's error, and that 'the bell having been rung once, very loudly and vigorously, can not now be "un-rung."

5. The Defendant cites the world-renowned Arabic sage and poet Omar Khayyam, who wrote in the famous "Rubaiyat of Omar K." in the ninth century that "the moving hand, having writ, moves on and not a tear shall remove one jot of it!" So, let it be said; let it be written and, so, LET IT BE DONE!

6. The Defendant further alleges he is absolutely entitled, as a matter of law and equity, to a formal written Order of this Honorable Court to Dismiss (with extreme prejudice) this particular ill-conceived and executed civil action for unspecified relief as will be shown and alleged, hereinbelow, as well.

COUNTERCLAIM

7. The Defendant restates, realleges and reiterates each and every allegation of his Answer as indicated hereinabove in paragraphs One through Six, as if re-written herein, verbatim.

8. The Defendant alleges that the Plaintiff, by and with the active aid, assistance and collusion, did conspire together, in full agreement, to extort, damage, injure, intimidate with actual or implied malice, did willfully collude, conspire, aid and abet each other to inflict severe mental and emotional distress upon the Defendant individually or as a group, wherever situate, and to use a grossly abusive form of legal Service of process to extort financial resources

from the Defendants, without substantial evidentiary proof or justification, all to the detriment and financial ruin of the Defendants, wherever situate.

9. The willful, wanton, and negligent acts of the Plaintiff and her retained counsel, did cause actual harm, pain, suffering, mental stress and injury, humiliation, loss of income, loss of filial consortium and other palpable and demonstrable harm, loss and damage to ^{the} reputation of the Defendants, wherever situate, to Community Scorn and derision. The Plaintiff's acts, as by and through her retained counsel, are the proximate cause of the Defendants' grievous injuries and damage.

10. The Defendant, above named, further alleges that the Plaintiff did intentionally inflict severe damage to the Defendant in the amount of \$50 Million and that he is entitled to such exemplary damages and other relief as this Honorable Court deems just, fair, equitable, as the facts and circumstances are deemed by this Honorable Court appropriate.

CROSS-CLAIM

11. The Defendant restates, realleges and does reiterate each and every allegation of Paragraphs One through Ten, hereinabove, as if restated herein, verbatim.

12. The Defendant alleges that the Plaintiff's retained counsel did wholly (or in part) adopt the written pleadings from another law firm, by slavishly copying those electronically, filed pleadings in CA#2021-CP-21-2051, but failed to modify that civil action to sufficiently accommodate his client's specific claims, either in whole or in part.

13. The Defendant further alleges that the Plaintiff's retained counsel did grossly and negligently, violate the South Carolina Code of Responsibility, both to his client and the public-at-large, and to the Defendants in particular wherever situate, and did, by fair extension, did intentionally or negligently, pollute the administration of justice, thereby bringing permanent damage to the legal system & the legal profession.

14. The Defendant further alleges that Plaintiff's retained counsel's reprehensible and arguably "unprofessional tactics" did cause and shall be deemed to have been the proximate cause and actual damage upon the Defendant, individually, and the Defendants, whenever situated.

15. The Defendant seeks actual and exemplary damages, and any other relief this Honorable Court deems just, fair and proper in the amount of ~~\$300~~ Million, for the following negligent acts of Plaintiff's retained counsel:

a. For failing to fully and properly investigate Plaintiff's claims;

b. For slavishly plagiarizing another counsel's electronically filed civil action (CA# 2021-CP-21-2051) and failing to modify sufficiently said pleadings to properly conform Plaintiff's claims to obvious fact(s);

c. For violating the SC Code of Ethics (1976), as annotated, and the ancillary

Code of Professional Responsibility, as can be adduced or inferred by counsel's negligent actions as alleged above; and,

d. For committing "Legal Malpractice" during the preparation, filing, and eventual service of process related directly to this cause of action for unspecified damages.

16. The Defendant further alleges that he now lives in great fear of his life, for the lives of his children and grandchildren, whenever situate because of counsel's bizarre civil action unless he and all Defendants, similarly situate, be protected from actual or implied harm by this Honorable Court from any further actions, by anyone who claims entitlement for unspecified damages.

17. The Defendant further alleges that unless he and all other defendants, wherever situate, will be targeted for similar actions by anonymous unknown plaintiffs and

their counsel, wherever situate.

WHEREFORE, THE DEFENDANT DEMANDS JUDGMENT against the Plaintiff and Plaintiff's retained counsel, for the relief demanded, as if repeated herein verbatim, as to each and every cause of action as alleged by the pro se Defendant.

(h.s.)/s/ F. Thomas Hopkins, II

FREDERICK T. Hopkins, II
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Executed this 25th day of October, 2021
Columbia, SC 29209-9481

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FTH