

Sanchez Hayes & Associates
1015 Tyrone Road
Building 600, Suite 620
Tyrone, Georgia 30290
770-692-5020

**SANCHEZ HAYES &
ASSOCIATES**

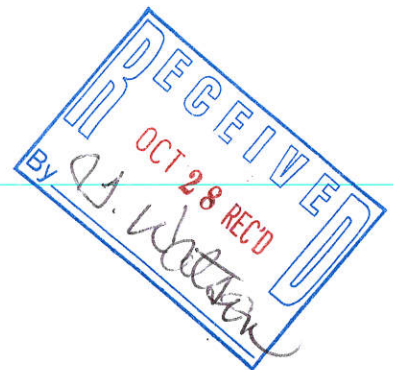
facsimile transmittal

	Date:	October 27, 2015
TO: Kenny Smith	Fax No.	678-692-0403
FR: Rudjard M. Hayes	Fax No.	770-692-5030
RE: Aveory Allen, Derek Wilder	Pages:	3 incl. fax cover

NOTES:

If you do not receive all three (3) pages please contact Betsy Watkins at 770-692-5020.

✓ C. D. Whalen
✓ G. Poole



This message is being sent by or on behalf of a lawyer. This message, including its contents and/or attachments, is intended exclusively for the individual or entity to which it is addressed. This communication may contain information that is proprietary, privileged, confidential or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain copy or disseminate this message in whole or in part. If you have received this message in error, please notify the sender immediately by telephone at the numbers listed above. Thank you.

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SANCHEZ HAYES & ASSOCIATES
LLC

Telephone: 770.692.5020
Facsimile: 770.692.5030
Sanchezhayeslaw.com

Via Facsimile

October 27, 2015

City of Griffin
Kenny Smith, City Manager
100 South Hill Street
P.O. Box T
Griffin, GA 30224

RE: *Ante Litem Notice pursuant to O.C.G.A. § 36-33-5*
Our Client: *Aveory Allen, Derek Wilder*
Date of Incident: *April 28, 2015*

Mr. Smith:

The purpose of this letter is to provide you with formal notice, pursuant to O.C.G.A. § 36-33-1 *et seq.* that an action for damages will be instituted by or on behalf of Aveory Allen ("Mr. Allen") and Derek Wilder ("Mr. Wilder") against the City of Griffin, Georgia, and/or the Griffin Police Department, and/or other individuals employed with the Griffin Police Department, in their individual and/or official capacities, who participated in, influenced, and/or failed to take appropriate action with respect to defamatory press release issued by the Griffin Police Department on or about April 28, 2015. This notice is being sent within six (6) months of the date of the incident as required by O.C.G.A. § 36-33-5.

The claims of Mr. Allen and Mr. Wilder arise out of a press release drafted, issued, and publicized by the Griffin Police Department on or about April 28, 2015. This press release contains false, defamatory, and highly offensive statements regarding Mr. Allen and Mr. Wilder which the Griffin Police Department held out as fact. Specifically, but without limitation, the press release states as fact that Mr. Allen and Mr. Wilder made physical contact with one or more students which exceeded the amount necessary for disciplinary action such that their conduct constituted a battery.

Mr. Allen and Mr. Wilder will bring their suit against the parties identified above for any and all claims which may be asserted on their behalf under state and federal law with respect to the defamatory statements of or concerning Mr. Allen and Mr. Wilder. Mr. Allen and Mr. Wilder intend to seek damages for their loss of income, mental and emotional pain and suffering, and any and all other damages to which they may be entitled. However, in a good faith attempt to resolve this dispute, Mr. Allen and Mr. Wilder will make an initial demand for \$200,000 to compromise and settle their claims. This offer will remain open until thirty (30) days following the date of this correspondence. If we do not hear from you by or before November 26, 2015, we will have no choice but to file suit on behalf of Mr. Allen and Mr. Wilder.

We look forward to your prompt response to the demand of Mr. Allen and Mr. Wilder. If you wish to discuss this matter, you may reach me by phone at 770-692-5020, or by email at rudjard@sanchezhayeslaw.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Rudjard M. Hayes". The signature is fluid and cursive, with the first name "Rudjard" being more prominent and the last name "Hayes" following in a similar style.

Rudjard M. Hayes

Attorney for Aveory Allen and Derek Wilder

Sanchez Hayes & Associates
1015 Tyrone Road
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Kenny Smith, City Manager
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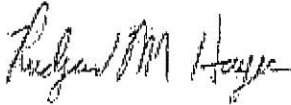
Mr. Allen's claims arise out of a press release drafted, issued, and publicized to the general public by the Griffin Police Department on or about April 28, 2015. This press release contains false, defamatory, and highly offensive statements regarding Mr. Allen which the Griffin Police Department held out as fact. Specifically, but without limitation, the press release states as fact that Mr. Allen made physical contact with one or more students which exceeded the amount necessary for disciplinary action such that their conduct constituted a battery.

Mr. Allen will bring his suit against the parties identified above for any and all claims which may be asserted on his behalf under state and federal law with respect to the defamatory statements of or concerning him. Mr. Allen intends to seek damages for his loss of income, mental and emotional pain and suffering, damage to reputation, and any and all other damages to which he may be entitled. However, in a good-faith attempt to resolve this dispute, Mr. Allen will make an initial demand for \$100,000 to compromise and settle his claims. This offer will remain open

until thirty (30) days following the date of this correspondence. If we do not hear from you by or before November 26, 2015, we will have no choice but to file suit on behalf of Mr. Allen.

We look forward to your prompt response to the demand of Mr. Allen. If you wish to discuss this matter, you may reach me by phone at 770-692-5020, or by email at rudjard@sanchezhayeslaw.com.

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Rudjard M. Hayes
Attorney for Aveory Allen