

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, MISSISSIPPI

WILLIE ANDERSON

RECEIVED & FILED

PLAINTIFF

VS.

APR 03 2003

CIVIL ACTION NO. 2003-35

DENNIS SWEET,
SHANE F. LANGSTON,
RICHARD FREESE,
LANGSTON SWEET & FREESE, P.A. d/b/a
LANGSTON FRAZIER SWEET & FREESE, P.A.,

BURNELL HARRIS, Circuit Clerk
By _____ d.c.

DEFENDANTS

COMPLAINT AND REQUEST FOR JURY TRIAL

COMES NOW, Willie Anderson, by and through his undersigned counsel, and in support for his claim of relief, shows unto this court the following, to wit:

1. That the plaintiff, Willie Anderson, is an adult resident citizen of Mississippi.
2. That the defendant, Dennis Sweet, is an adult resident citizen of Mississippi who resides in Brandon, Mississippi and may be served at his place of employment located at LANGSTON SWEET & FREESE, P.A., 201 N PRESIDENT ST., JACKSON, MISSISSIPPI 39201.
3. That the Defendant, Shane F. Langston, is an adult resident citizen of Mississippi who may be served at his place of employment located at LANGSTON SWEET & FREESE, P.A., 201 N PRESIDENT ST., JACKSON, MISSISSIPPI 39201.
4. That the Defendant, Richard Freese, is an adult resident citizen of Mississippi who may be served at his place of employment located at LANGSTON SWEET & FREESE, P.A., 201 N PRESIDENT ST., JACKSON, MISSISSIPPI 39201.
5. That the defendant, LANGSTON SWEET & FREESE, P.A. d/b/a LANGSTON FRAZIER SWEET & FREESE, P.A., is a Mississippi corporation who may be served

through its registered agent, Shane F. Langston, located at 201 N PRESIDENT ST., JACKSON, MS 39201.

6. That at all times mentioned in this complaint, defendant Dennis Sweet, was the appointed, qualified, and acting agent, servant, representative, affiliate, associate and/or employee of the defendants Shane F. Langston, Richard Freese, and LANGSTON SWEET & FREESE, P.A. d/b/a LANGSTON FRAZIER SWEET & FREESE, P.A.. In doing the matters alleged in this complaint, the defendant, Dennis Sweet, was acting within the course and scope of that agency, association and/or employment.
7. That sometime in 1999, the plaintiff, Willie Anderson, and the defendant Dennis Sweet [also on behalf of his law Firm, Shane F. Langston and Richard Freese] reached an oral agreement concerning procurement of clients who would ultimately become plaintiffs in various tort cases litigated by the defendants.
8. That the plaintiff and the defendants reached an agreement by which in return for the plaintiff's services in helping the defendants sign clients up for tort cases, that plaintiff would be compensated in addition to the expenses (i.e. gas and other travel expenses) he incurred, he would receive the sum of no less than \$1,500,000.00 at the conclusion (i.e. final judgement or settlement) of said tort cases, and no more than \$4,000,000.00.
9. That based on the aforementioned promises and agreements, the plaintiff assisted the defendants in obtaining said clients.
10. That for the next 2 and a half years or so, after the plaintiff and the defendants reached this agreement, Willie Anderson worked tirelessly and faithfully for the defendants in helping them obtain their perspective tort clients.

11. That the dedication and diligence exhibited by the plaintiff on behalf of the defendants could be characterized as that of a happy black slave singing 'Dixie' in the defendants tort fields, feverishly pick'in clients with no idea that his masters and whipping boy had no intentions on giving him that kind of money 'to buy his freedom'.
12. That the plaintiff, during said time period, often worked 7 day weeks and countless hours obtaining clients for the defendants for various pharmaceutical tort cases such as Phen-Phen, Rezulin, and Propulsid, and insurance cases such as Combined, Prime America, Union National, Equitable and others such as silicosis.
13. That with due regard to the preceding paragraph of this complaint, Willie Anderson did the substantial 'leg work' in reviewing clients, cases, deed and tax records in:
 - i. Fayette, Mississippi
 - ii. Jefferson Davis County, Mississippi
 - iii. Port Gibson, Mississippi
 - iv. Utica, Mississippi
 - v. Georgetown, Mississippi
 - vi. Woodville, Mississippi
 - vii. Jasper County, Mississippi
 - viii. Washington County, Mississippi
 - ix. Greenville, Mississippi
 - x. Clarksdale, Mississippi
 - xi. Holmes County, Mississippi

