

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

BILL GEESLIN

PLAINTIFF

VS.

CASE NO: _____

KOBE BRYANT

DEFENDANT

COMPLAINT

Comes now the Plaintiff, Bill Geeslin, by and through his Attorneys, Reid, Burge, Prevallet & Coleman, and for his Complaint against the Defendant, Kobe Bryant, states:

PRELIMINARY STATEMENT

1. This action for assault and battery and extreme and outrageous conduct arises out of the Defendant, Kobe Bryant, unlawfully striking the Plaintiff, Bill Geeslin, while he was a spectator at a professional basketball game between the Los Angeles Lakers basketball team and the Memphis Grizzlies basketball team at the FedEx Forum in Memphis, Tennessee, on November 14, 2005.

THE PARTIES

2. Plaintiff, Bill Geeslin, is now and was at all times pertinent to this Complaint, a resident and citizen of the State of Arkansas.

3. The Defendant, Kobe Bryant, is now and was at all times pertinent to this Complaint, a resident and citizen of the State of California.

JURISDICTION AND VENUE

4. This Court has original subject matter jurisdiction with respect to this action pursuant to 28 U.S.C. § 1332, as there exists complete diversity of citizenship between Plaintiff and Defendant, and the amount in controversy exceeds \$75,000.00, exclusive of interest and costs.

5. Venue is proper pursuant to 28 U.S.C. § 1391, because the events giving rise to this action occurred in Memphis, Shelby County, Tennessee.

6. The Defendant, Kobe Bryant, is subject to the jurisdiction of this Court pursuant to the Tennessee Long-Arm Statute, T.C.A. § 20-2-214 (a) (2), in that he committed a tortious act within the State of Tennessee.

**CAUSE OF ACTION FOR ASSAULT AND BATTERY
AND EXTREME AND OUTRAGEOUS CONDUCT**

7. On November 14, 2005, Plaintiff, Bill Geeslin, was a spectator attending a National Basketball Association (“NBA”) professional basketball game between the Memphis Grizzlies basketball team and the Los Angeles Lakers basketball team.

8. Kobe Bryant is now and was at all times pertinent to this action, a player for the Los Angeles Lakers basketball team.

9. During the course of the game between the Memphis Grizzlies and Los Angeles Lakers, Kobe Bryant left the basketball court and entered the spectators’ section where Bill Geeslin was sitting and landed on Mr. Geeslin. While Defendant was on Mr. Geeslin in the spectators’ section, the Defendant committed assault and battery and engaged in extreme and outrageous conduct when the Defendant, without provocation, violently struck Mr. Geeslin with the Defendant’s elbow, causing Mr. Geeslin injury and damages.

10. As a proximate result of the Defendant’s conduct, Mr. Geeslin received injuries for which he sought medical attention and has suffered great pain of body and mind, and has incurred expenses for medical attention.

11. As a proximate result of the Defendant’s intentional misconduct as set forth above, Mr. Geeslin is entitled to recover damages from the Defendant in an amount which the jury finds to be just to compensate him for the following elements of damage:

- (a) Past and future physical pain and suffering;
- (b) Past and future mental or emotional pain and suffering;
- (c) Loss of earnings;
- (d) Past and future serious and severe emotional injury; and
- (e) Such other damages as may be shown by the evidence at trial.

12. In addition to compensatory damages, Mr. Geeslin is entitled to recover from the Defendant, Kobe Bryant, punitive damages in an amount the jury finds to be just to punish the Defendant and to deter others from committing similar wrongs in the future.

JURY DEMAND

13. Plaintiff, Bill Geeslin, respectfully demands trial by jury in this case.

WHEREFORE, Plaintiff, Bill Geeslin, prays that he be granted trial by jury; that he be granted judgment against the Defendant for compensatory and punitive damages in an amount to be determined by the jury in excess of \$75,000.00, exclusive of interest and costs; that he be awarded his costs; and, that he be granted all other proper relief.

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