

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT
OF FLORIDA,

2014 DEC 17 09:11:47

ALAN B. GRIFFIN,
Plaintiff,

RECEIVED
U.S. DISTRICT COURT
MIDDLE DISTRICT
OF FLORIDA
TALLAHASSEE, FLORIDA

v.

Civil Action No:

MAURY POVICH, Defendant,;
MO PO PRODUCTION INC, Defendant,;
NBC UNIVERSAL DISTRIBUTION,
Defendant;

8:14 cv 3144 T36TGW

COMPLAINT

This is a civil action authorized by 28 U.S.C. § 1332. This Honorable Court has jurisdiction; the Plaintiff is a citizen of Florida and the Defendant Maury Povich is a citizen of New York. Defendant(s) MoPo Production Inc and NBC Universal are corporations incorporated under the laws of New York with its principle place of business in New York. The amount in controversy without interest and cost exceeds the sum or value specified by 28 U.S.C. 1332.

PLAINTIFF

Plaintiff Alan B. Griffin, is and was at all time a prisoner of the State of Florida at Columbia C.I. 216 S.E. Corrections Way, Lake City, Florida 32025.

F.S.

DEFENDANT(S)

Defendant Maury Povich current known address is [REDACTED]

Defendant MoPo Production is mention at all time 200 Park Avenue S. New York, N.Y. 10003.

Defendant NBC Universal Distribution is mention at all time 30 Rockefeller Plaza New York, N.Y. 10112.

FACTS

On December 11, 2010 while incarcerated at the North Florida Reception Center, Lake Butler, Florida. The Plaintiff (Alan Griffin) while watching television was exposed to an episode of the Maury Show. On this particular episode Mr. Povich (Defendant 1) had my ex-wife Sherilitra Nash and my daughter Lanique Griffin as guest on his show. Upon seeing my seven (7) yr old daughter on this broadcast was a great emotional shock, grief, shame, and embarrassment because the topic of the program was about myself. The emotional distress was so over bearing was too much for Mr. Griffin to overcome. The next day Mr. Griffin had suicidal thoughts which derived from seeing his only child being exploited by the named Defendant(s) in this complaint. The Dept. of Corrections (Hamilton C.I.) mental health doctors, place Mr. Griffin under suicidal watch (harm) for 72 hrs. Then Mr. Griffin was sent to a Crisis Suicide Unit (CSU) at Charlotte C.I. for 22 days for therapy and counseling. January 11, 2011 Mr. Griffin was sent to Columbia C.I. for psychoelectric counseling for an entire year. Mr. Griffin still suffers

FACTS (cont.)

From the fright and horror of seeing his daughter on the Maury Show. Mr. Povich and MoPo Productions Inc. did not have Mr. Griffin's parental consent to have his daughter Lanique Griffin appear as a guest on their program. Mr. Griffin has joint custody of Lanique Griffin that was given to him during a divorce proceeding on September 20, 1998. From that date to the present as this lawsuit is being filed, Mr. Griffin's custody have never changed. Mr. Povich and MoPo Production a signed consent from both Mr. Griffin and Ms. Nash in order to have Lanique Griffin appear on the program, because Lanique Griffin being a minor. Mr. Griffin did not sign or verbally give his consent to have his daughter appear on the Maury Show. Mr. Griffin also did not have any knowledge that his daughter left the State of Florida to appear on this formentation program. Mr. Povich, MoPo Production Inc and NBC Universal Distribution are liable for broadcasting Mr. Griffin's daughter on the Maury Show without his consent causing Mr. Griffin emotional distress. NBC Universal is liable of all content aired on the Maury Povich Show when it distributed the said episode to syndicated station through out the U.S., which exposed Mr. Griffin to emotional distress. Maury Povich, MoPo Production, and NBC Universal Distribution made millions of dollars at the mental and emotional distress of Mr. Griffin.

LEGAL CLAIMS

The Plaintiff is filing this lawsuit under the Restatement (Second) of Torts § 46 mental suffering and emotional distress, due to the named Defendant(s) in this lawsuit. negligence. The Plaintiff suffered significant harm of emotional distress. That significant harm is clearly establish by documentation of Dept. of Corrections officals at the time of the injury upon the Plaintiff. There was a connection between that significant harm inflicted by the named Defendant(s), when the Plaintiff was expose to the outragous conduct that put the Plaintiff in ~~pps~~ physical harm of himself (suicidal thoughts) causing emotional shock, embarrassment, grief, and shame due to the named Defendant(s) conduct. Plaintiff was within the zone of physical damage created by the named Defendant(s) negligence.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays that this Honorable Court enter a judgment granting plaintiff:

- 1) Monetary Damages in the amount of \$100,000 against each Defendant.
- 2) A jury trial on all issues triable by jury.
- 3) Plaintiff's costs in this suit

PRAYER FOR RELIEF (cont)

- 4) Any additional relief this Honorable Court deems just proper and equitable.

Date: ~~12/5/14~~ ABG
12/11/14

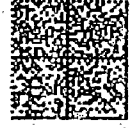
Respectfully submitted
1st. Ala B ~~Griffin~~
Alan B. Griffin

VERIFICATION

I have read the foregoing complaint and hereby verify that the matters alleged on information and belief, and as those, I believe them to be true. I certify under the penalty of perjury that the foregoing is true and correct.

1st. Ala B ~~Griffin~~
Alan B. Griffin

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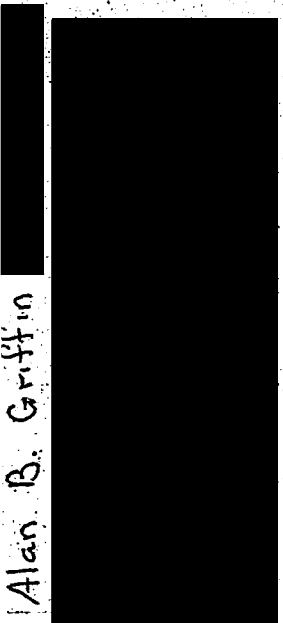
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Alan B. Griffin

Mailed 12-11-2014

D. Pittman

aka B. J. W.

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