

**CAUSE NO. 2020-51549**

**ELIZABETH WILLIAMS,**

**Plaintiff,**

**V.**

**WILLIAM P. RAMEY and RAMEY &  
SCHWALLER, LLP**

**Defendants.**

§ **IN THE DISTRICT COURT OF**

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**HARRIS COUNTY, TEXAS**

**157<sup>TH</sup> JUDICIAL DISTRICT**

**DEFENDANT WILLIAM P. RAMEY'S ORIGINAL ANSWER, AFFIRMATIVE  
DEFENSES, REQUEST FOR DISCLOSURE, AND COUNTERCLAIMS**

Defendant William P. Ramey ("Ramey" or "Defendant") files this Original Answer, Affirmative Defenses, Counterclaims, Request for Disclosure, First Set of Interrogatories, First Set of Request for Production, and First Set of Requests for Admission seeking relief from Plaintiff Elizabeth Williams ("Williams" or "Plaintiff"), showing the Court as follows:

**I. ANSWER**

**A. GENERAL DENIAL**

1. Pursuant to Texas Rule of Civil Procedure 92, Defendant generally denies the allegations in Plaintiff's Original Petition and demands that Plaintiff prove her allegations by a preponderance of the credible evidence.

**B. AFFIRMATIVE DEFENSES**

2. While not agreeing that Defendant is liable under any cognizable theory advanced by Plaintiff, pursuant to Texas Rule of Civil Procedure 94, Defendant asserts the following affirmative defenses to Plaintiff's claims.

- a. Plaintiff's claims are barred by the affirmative defense of laches as Williams worked for Ramey since 2011 without any complaints.
- b. Plaintiff's claims are barred by the affirmative defenses of waiver and equitable estoppel because Plaintiff's first explanation for her alleged injuries were that she had fallen due to her own fault and inebriation and is therefore estopped from making any after-the-fact alteration to this in order to attempt to secure financial gain through the courts.
- c. self-caused Plaintiff's claims are barred by assuming the risk of drinking. Plaintiff had actual knowledge that her own drinking could cause her to become inebriated and result in self-injury, she wholly accepted the risk by drinking – to excess – and as a result undertook this inherently dangerous action on her own, thereby resulting in her own injuries.
- d. Plaintiff's claims are barred by contributory negligence because Plaintiff drank too much alcohol then she fell, causing her own injuries.
- e. Plaintiff has failed to mitigate her damages.
- f. Plaintiff's injuries, if any, were wholly caused, or alternatively were contributed to, by the Plaintiff's own negligence and misconduct and the Defendant affirmatively pleads comparative negligence.
- g. Defendant will show that if Plaintiff was damaged as alleged, then the damage resulted from acts or omissions of third parties or persons, including other parties, whether named herein or not, for whose acts or omissions this Defendant is not responsible.

- h. Plaintiff failed to exercise due care for her own safety, causing in whole or part, her own damages as alleged.
- i. Defendant pleads statute of limitations.
- j. Defendant further alleges that Plaintiff's injuries, if any, and her present mental and physical condition were the result of pre-existing physical, intellectual and/or emotional conditions not related to the incident alleged or were the result of physical, intellectual and/or emotional conditions which occurred after the incident at issue.

## **II. REQUEST FOR DISCLOSURE**

Pursuant to Texas Rule of Civil Procedure 194.2, you are requested to disclose, within 30 days of service of this request, the information or material described in Rule 194.2(a) – (l).

## **III. COUNTERCLAIMS BY WILLIAM P. RAMEY**

William P. Ramey, III, counter-plaintiff, complains of Elizabeth Williams, counter-defendant, for the following acts and omissions, and would show the Court as follows:

### **A. Discovery**

- 1. Counter-Plaintiff intends to conduct discovery in this matter in accordance with Level 3 of the Texas Rules of Civil Procedure, Rule 190.4.

### **B. The Parties**

- 2. Counter-Plaintiff William P. Ramey, III ("Ramey") is an individual residing in Harris County, Texas.
- 3. Counter-defendant Elizabeth Williams ("Williams") is an individual residing in the State of Michigan. Williams has entered an appearance in this matter as the Plaintiff.

### **C. Jurisdiction and Venue**

- 4. The amount in controversy is within the jurisdictional limits of the Court as Ramey seeks

an amount greater than \$1 million. As required by Rule 47 of the Texas Rules of Civil Procedure, Ramey affirms that “the damages sought are within the jurisdictional limits of the court.” In addition, at the time of filing this Petition, Ramey seeks “monetary relief over \$1,000,000” and “a demand for judgment for all the other relief to which the party deems himself entitled.” Ramey specifically reserves the right, provided by the Texas Rules of Civil Procedure, to amend and/or supplement this pleading.

5. Pursuant to Section 15.017 of the Texas Civil Practice & Remedies Code, jurisdiction and venue in this case is proper in Harris County, Texas, because Harris County is the county in which all or a substantial part of the events and omissions occurred giving rise to the causes of action.

#### **IV. FACTS**

6. This is a case of extortion and greed by Williams, a former employee of the law firm Ramey & Schwaller, LLP. Williams filed this case after the Defendants refused to pay \$3,500,000.00 demanded by Williams for Williams’ own drunkenness, self-caused alleged injuries, and imagined (or falsified) claims. Williams has threatened to destroy Ramey’s business, his reputation, his marriage, and his family over wholly fabricated claims; but Williams offered to protect these – if the Defendants would pay her \$3,500,000.00.
7. In 2011, Ramey left the partnership of Novak Druce & Quigg, LLP (“Novak Druce”) to form his own firm that became R&S (“R&S” or “Firm”). Ramey hired Williams from Novak Druce as the firm’s paralegal. Ramey previously worked with Williams at Novak Druce since at least 2010.
8. Williams was the Firm’s first employee. Over the years, Ramey came to consider Williams a close personal-friend. Williams and her (former) husband on occasion went to social

outings with Ramey and his wife, Kelly. Further, on more than one occasion, Williams watched Ramey's daughter Alexa when an emergency arose, and Ramey was without other sitter options.

9. From 2011-2017, R&S grew in size, necessitating the hiring of additional paralegal staff and attorneys. Williams solely handled all of the firm's paralegal work for Ramey until about 2014-2015. One hire, a close friend of Williams outside the office, came strongly recommended by Williams.
10. During this time of growth, Williams began to exhibit control issues related to her position within R&S. For example, in the Fall of 2017 and the Spring of 2018, it was reported by others in the Firm that Williams would not take direction from other lawyers in the Firm stating that she only answered to Ramey. This insubordination resulted in disciplinary action being taken as to Williams.
11. Williams' job performance began to decline in the Fall of 2017. Williams claimed that her problems were related to the emotions related to her divorce. While she was verbally warned about her performance, the two named partners, one a female, acquiesced to Williams' promises to improve.
12. In the Spring of 2018, Williams job performance was again deteriorating because Williams was supporting the co-worker and friend she had recommended for employment, who was not performing at the levels expected by the Firm – or by Williams. Instead of recommending this employee's termination, Williams took on the extra work and emotional burden to her own performance detriment.
13. After her divorce, Williams bragged to various office staff that she had moved to an apartment complex near R&S's Houston office and she was enjoying her new life

freedoms. She bragged that she was enjoying dating again and that she was using a dating app on the Internet. This commentary was not professional.

14. In the summer of 2018, Williams was found to be keeping a supply of homemade brew of a mixed liquor and apple juice in the office. No disciplinary action was taken as Williams was not seen drinking anything in the office during work hours.
15. In July of 2018, Williams attended an Astros game with Ramey and his wife. Williams was exceedingly inebriated when she arrived at the game and continued to drink once there. During her inebriation, Williams tried to convince Ramey and his wife to invest in real estate with her in Detroit, Michigan. Ramey said no.
16. During the game, Mrs. Ramey had to help Williams to stand, get to and use the restroom and to keep her balance. Williams was verbally inappropriate with Mrs. Ramey. Mr. and Mrs. Ramey then helped the unbalanced and inebriated Williams to an Uber.
17. The next week, Williams apologized for her inebriation at the Astros game and stated she could not remember (and denied) making any inappropriate verbal comments to Mrs. Ramey. Williams was told that her conduct would not be tolerated and she then became aware her job was in jeopardy.
18. Williams was aware that Ramey would be out of town for the month of October on a Benefit Trip to raise money for the Leukemia and Lymphoma Society. In August of 2018, Williams told Ramey that Ramey's female partner would not be able to run the Firm while he was away. Ramey disregarded Williams' attack on Ramey's partner and Williams was displeased her advice was ignored.
19. In early September of 2018, Ramey sought to move the co-worker/friend of Williams to another position where she might be better able to perform. Williams was consulted and

said she understood and added that the reason her own work was suffering was that she was still doing most of the friend's work and was in need of relief herself. Williams then assumed the role of the Litigation Paralegal. The friend was moved to a different role in the firm at Williams's request.

20. As Ramey's Benefit Trip approached, Williams became more insistent that Ramey's female partner was unable to run the firm. Again, Ramey disregarded Williams' insubordinate statements.

21. On September 28, 2018, the Friday before Ramey was to leave town for the Benefit Trip, work was hectic in order to finalize matters before Ramey was to leave town. Williams asked to go to lunch with Ramey to discuss an upcoming trial and more concerns she had about how she thought the firm should be run. Ramey agreed to the lunch and they left. The lunch began around 1:00 pm. Williams and Ramey consumed alcohol at the lunch.

22. Into the lunch, Williams began to share personal matters – intimacies about dating people on a dating app. She intimated that she was very upset with the dating process and that she and wanted something more 'permanent'.

23. Ramey changed the subject back to work and upcoming trial. After discussions about witnesses needed at trial, Williams brought up one of her favorite topics, the Justice Brett Kavanaugh hearings that were in full session at the time. Williams was amazed that Dr. Christine Blasey Ford could make millions merely from an accusation.

24. After lunch, Ramey and Williams continued the work meeting back in R&S's conference room at about 5:00 pm, and also continued to drink. Several employees were still in the office. Over the next hour, Ramey took multiple phone calls from different people, including his wife. While Ramey was working, Williams left the conference room to return

to her office to finish some work and check on her dog she had brought to the office that day.

25. At about 6:30 pm, Williams reentered the conference room and again began to talk about the Kavanaugh Hearings. Both Ramey and Williams had consumed more alcohol, to a point of being inebriated during which time the conversation was steered by Williams to her own personal matters. In reflecting on the Kavanaugh Hearings, Williams shared with Ramey that she had gone through a traumatic incident earlier in life and had sought counseling for it. Ramey then shared a traumatic story of his own with Williams that he had never before shared.
26. Williams then left the conference room and Ramey, emotionally drained, put his head down and took a short nap and was asleep for about two hours.
27. Later, at about 8:50 p.m., Ramey awoke in the same chair in the conference room. Williams was not in the conference room. Ramey found Williams lying face down on the floor in the hallway towards the front of the office.
28. Ramey approached Williams and called her name, but she did not respond. Ramey then spent a few minutes trying to get Williams to sit up, but Ramey could not get her to move. Finally, Williams responded “no” but made no further sounds or movement. Ramey went back to his office to text his wife for help with Williams. However, before Ramey got the chance to send the text, he heard the front door of the office suite open; Williams was gone.
29. Apparently, Williams had gone into the ladies’ room and locked the door behind her. Ramey knocked on the door, and asked her if she was okay and if he could help? She replied she was fine, and he should leave.



30. Ramey returned to his office at 8:56 p.m. and texted his wife that Williams was drunk. He asked her what to do. In reply, Mrs. Ramey called Ramey back at 9:02 p.m. Ramey told Mrs. Ramey that Williams was drunk and asked Mrs. Ramey to come to the office to help him deal with Williams. Mrs. Ramey was familiar with Williams' prior inebriation episode and refused to wake their small daughter to come to the office to deal with Williams. Mrs. Ramey explained that if Williams was drunk, it was best to let her stay at the office and sleep it off there.
31. Ramey went back to the restroom and made one more check to make sure Williams was there and safe. Through the door, Williams again stated she was okay and Williams told Ramey that she wanted to just stay there.
32. Ramey went home, arriving by 9:30 p.m. He went to sleep. Around 2:30 a.m., he awoke, and went back to the office to check up on Williams, but she was gone. However, Ramey saw her watch on the conference room table. Ramey picked up the watch to give to Williams later and noticed a fresh pooling of blood on the floor on the far side of the conference room, near the windowsill. Due to Williams' prior statements of her own mental instability and her clear inebriation while at the Firm, Ramey started to worry that Williams may have hurt herself. Ramey texted Williams at 3:07 a.m. to ask if she got home okay while he was still at the office. She did not reply. Ramey followed up with a phone call at 3:19 a.m. to Williams's cell phone. Ramey's cell phone has no record of any incoming call from Mrs. Ramey's 9:02 p.m. call on the 28<sup>th</sup> to 11:27 a.m. on the 29<sup>th</sup>. Williams did not call Ramey.
33. Ramey followed up again the next morning with texts asking Williams if she was okay.

34. During breakfast at a restaurant the following morning, on September 29, 2018, with his family, Ramey called Williams and they spoke on the phone for several minutes. Mrs. Ramey listened in on the conversation. Williams told Ramey she could not remember if she had slept in her office or on the conference room floor, but that her face was “busted up.” Williams stated that she believed she had lost her balance and tripped over either the conference room chairs or her dog. Williams told Ramey that she had some memory of ‘falling flat on her face’ and her dog licking her. Ramey asked Williams if she was okay and she replied that her face was very sore. Williams never confronted Ramey about her injuries but rather admitted her injuries were self-caused.
35. Williams requested and Ramey agreed that Williams could work from home while her face healed. Ramey and Williams continued to text one another and Williams continued to work at the law firm through October 3, 2018, the day Williams and her lawyer launched their plan to extort money from Ramey and R&S, and to otherwise profit from Williams’ self-caused injuries and Ramey’s traumatic incident.
36. Over the course of September 29<sup>th</sup> through October 3<sup>rd</sup>, Ramey texted William about his concern for her, that he was concerned about their inebriation, that due to the inebriation he had been a poor example as an employer. In the texts, Ramey admitted to not remembering what happened but that is limited to the time he was asleep, from about 7:00 p.m. to about 9:00 p.m. After that, Ramey left the office, returning home, and Williams stayed in the office for over four hours. Ramey and Mrs. Ramey invited Williams to have dinner with them the evening of the 29<sup>th</sup> but Williams responded that she was supposed to go to a friend’s house. Williams told that friend that she had fallen. Ramey reiterated that he considered Williams one of his best friends and he felt badly that she had been hurt.

37. On Monday, October 1, 2018, Williams had her friend clean up the blood spot in the conference room with Hydrogen Peroxide but that only caused the pooled spot of blood to smear. Williams told the friend she had fallen in the conference room and needed the blood cleaned up. On October 2, 2018, the friend/employee laughed about it, telling Ramey that Williams had told her she had fallen – and had taken quite a “face plant”. Later that day at a lunch with Williams, and ostensibly after Williams had decided to create a false narrative to support a money demand, Williams for the first time told the friend that Williams blamed Ramey for her injuries.

38. After hiring a lawyer, Williams changed her story from one that had her falling due to her own inebriation when Ramey was not in the office, to one which would ostensibly support threats of the destruction of Ramey’s personal and professional life. A fabricated story for which Williams demanded \$3,500,000.00 not to tell.

## **V. CAUSES OF ACTION**

39. Until her revelation she could make money for creating a story of assault, Williams told everyone, including her best friend in Houston, and several others, that she had simply fallen after drinking too much. On all occasions prior to the determination to turn her fall into a money-making event, Williams affirmatively stated that she had no memory of how she hurt her face and admitted to voluntarily heavily drinking.

40. This case is a wholly concocted, factually baseless and a frivolous suit. Armed with her self-caused injuries, Williams saw Ramey and R&S as her retirement fund. Her goal: to financially benefit from Ramey with her lawyers help.

41. Williams alleges the event occurred on September 28, 2018. Between then and October 4,

2018, Williams 1) hired a lawyer and 2) had the lawyer threaten criminal prosecution and a lawsuit if Ramey and his firm did not pay money to Williams. Williams hired her lawyer to facilitate this shakedown.

42. Ramey refused to be extorted and refused to pay what Williams wanted – later found to be \$3,500,000.00.

43. It was much later, on October 9, 2018, after Williams' shake-down was unsuccessful, and 11 days after this allegedly traumatic 'assault' on her that Williams first made a report to the police.

44. Williams, through her lawyer, confirmed that the criminal and civil matters would 'go away' if Ramey or R&S paid money to Williams.

45. Even though Williams did not return to work the Monday following her Friday fall, Williams called and spoke with Ramey and another partner of the firm by phone at about 9:00 a.m. while they were driving. On the phone call Williams asked to have a few days off because her face was really messed up and she wanted it to heal before she returned to the office. Williams told Ramey that she was going to the doctor to have her face looked at because she was afraid the injuries might scar and her nose kept bleeding. Williams mentioned nothing about an assault whatsoever.

46. On October 2<sup>nd</sup>, the workplace friend of Williams told Ramey that Williams had complained about spending money on her injuries and that Williams was afraid the injuries might require plastic surgery. Ramey and Brian Switalski, the firm's office manager/financial manager, were sympathetic to Williams's injuries because she had been hurt in the Firm's office. Additionally, both needed her to return to the office for work and therefore advanced her

year-end bonus early, a check from the Firm for \$10,000.00 to offset any unexpected medical bills. Switalski wrote a Ramey & Schwaller, LLP Firm check for \$10,000.00 to Williams. Ramey texted Williams that the check was left in the drawer of her desk as Williams had not come to the office. For several years, Williams had received \$10,000.00 or more as a year-end bonus.

47. Williams' originally told at least two friends that she had fallen and hurt herself but could not remember how she fell. However, the blood spot in the conference room shows where she fell – there is no evidence of dragging or any other kind of assault. Taken at her word before she hired a lawyer, she hurt herself. After she hired a lawyer, it became assault. Still later, when she talked to police, it became an attempted sexual assault. All credible evidence shows Williams fell. The rest is Williams's attempt to turn her paralegal skills into a million-dollar payday.

48. After her injuries, Williams posted on social media about a trip to the northern US with her dog, about travelling and enjoying “the sun, the warm winds, and the margaritas” in the Bahamas, and of more. It was not until after this trip where she undoubtedly further strategized her scheme that Williams took the time to meet with the Houston Police Department about her complaint.

49. To support Ramey's version of events, Mrs. Ramey took a polygraph examination to prove she heard Williams say on the phone the very next day that Williams believed her injuries were a result of her own fall.

50. Additionally, Ramey himself took two polygraphs conducted by two of Houston's most respected examiners. Each examiner independently determined there was no deception

indicated when Ramey said he did not attempt to sexually assault Williams and he did not cause any of her injuries.

51. Williams' story lacks credibility and her actions confirm she is untrustworthy. Williams filed a claim with the Texas Workforce Commission to get unemployment money, falsely claiming she was fired from the Ramey & Schwaller, LLP. This was clearly not true. The Texas Workforce Commission ("TWC") investigated the claim and determined Williams had quit and had not been fired as she had falsely claimed. The TWC therefore DENIED Williams's claim. Williams' claim was at least in part denied because of an October 4, 2018 text exchange between Williams and a lawyer in the firm showing Williams voluntarily quitting her job. In the texts, Williams was asked if she was coming to the office on October 4, 2018 and she replied that she was taking medical leave and had cleared it with Ramey. However, October 4, 2018 coincides with the day Williams' lawyer sent the demand letter for money in exchange for not reporting him to the police and not suing him.

52. Tellingly, under oath to the TWC, Williams admitted that she had told her best friend that a fall caused her injuries- not any assault.

53. This case is a money-grab. All one has to do to ruin a man's reputation, his business and his life is to allege sexual assault or an attempt to sexually assault. The stigma of doing such a thing is so bad, so ruinous, that many would pay just to avoid the allegation. That was what Williams clearly had banked on. Williams has taken actions to pursue this shake down. Ramey will not bend. Williams knows she hurt herself, that Ramey never hurt or attempted to assault her, and that her claims are no more than a fabricated money grab.

54. After this incident, the R&S office became alcohol-free. Ramey entered counseling, admitting he is an alcoholic.

55. Williams lied to the Texas Workforce Commission to get money. She lied to the police after her civil lawyer made money demands that were not satisfied. Williams' concocted and baseless claims are, no more and no less than, an attempt to extort Ramey for millions of dollars by threatening to damage his reputation, destroy his livelihood, destroy the livelihood of others in the Firm, destroy his professional career, and alienate his family and friends.

**VI. Defamation – Libel per se and Slander per se**

56. Williams published her false accusations that Ramey attempted to sexually assault her to anyone who would listen, including the on-line publication Texas Lawyer, several Ramey & Schwaller clients, the Houston Police Department, several identified friends of Ramey, other employees at Ramey & Schwaller LLP, other paralegals known to Ramey, and many more.

57. The false allegation that Ramey attempted to sexually assault Williams is defamatory and false. The allegations are not ambiguous and are intended to injure Ramey's reputation and livelihood. Williams expressed in the fall of 2018 in her personal e-mail the intent to destroy Ramey and take down R&S with the false allegations. Williams false allegations are intended by Williams to injure and impeach Ramey's reputation and expose Ramey to public hatred, contempt, ridicule, and financial injury. Williams sought to profit from publishing Ramey's traumatic incident, likely believing that Ramey would not defend himself to keep the matter secret.

58. Williams knew the allegation was false when she made it and made the allegation in an attempt to extort money from Ramey with actual malice. Additionally, given the nature of the allegation, Williams is strictly liable.

59. Ramey suffered loss of income, clients, reputation, legal community standing, his cost of defense, his cost of prosecuting this lawsuit, and his time. Ramey is further entitled to court costs and punitive and exemplary damages to dissuade such conduct from others in the future. Ramey is entitled to court costs and both pre- and post-judgment interest.

## **VII. Business Disparagement**

60. Williams published her false accusations that Ramey attempted to sexually assault her to anyone who would listen, including the on-line publication Texas Lawyer, several Ramey & Schwaller clients, the Houston Police Department, several identified friends of Ramey, other employees at Ramey & Schwaller LLP, other paralegals known to Ramey, and many more.

61. The false allegation that Ramey attempted to sexually assault Williams is defamatory and false. The allegations are not ambiguous and intended to injure Ramey's reputation and livelihood. Williams expressed in the fall of 2018 in her personal e-mail seen and reported by a temporary employee at Williams' desk, her intent to destroy Ramey and take down R&S with the false allegations. Williams' false allegations are intended by Williams to injure and impeach Ramey's reputation and expose Ramey to public hatred, contempt, ridicule, and financial injury. Williams sought to profit from publishing Ramey's traumatic incident, believing that Ramey would not defend himself to keep the matter secret.

62. Williams knew the allegation was false when she made it and made the allegation in an attempt to extort money from Ramey with actual malice and the statements affect Ramey's



economic and business interests, including but not limited to the interests of Ramey & Schwaller, LLP, its partners, employees, and clients. Further, Williams made the publications without privilege.

63. Ramey suffered special damages, including loss of income, clients, reputation, legal community standing, his cost of defense, his cost of prosecuting this lawsuit, and his time. Ramey is further entitled to court costs and punitive and exemplary damages to dissuade such conduct from others in the future. Ramey is entitled to court costs and both pre- and post-judgment interest.

#### **VIII. Malicious Criminal and Civil Prosecution**

64. Williams initiated and procured the criminal prosecution of Ramey by publishing her false accusations that Ramey attempted to sexually assault her to the Houston Police Department. The false report resulted in charges being filed against Ramey. Then on or about August 26, 2020, Williams filed a civil action against Ramey and R&S based on the same false and salacious allegations.
65. Ramey is innocent of the charges and both R&S and Ramey have no liability to Williams.
66. Williams did not have probable cause to initiate the criminal prosecution or the civil lawsuit.
67. The false allegation that Ramey attempted to sexually assault Williams is defamatory and false. The allegations are not ambiguous and intended to injure Ramey's reputation and livelihood. Williams expressed in the fall of 2018 in her personal e-mail the intent to destroy Ramey and take down R&S with the false allegations. Williams false allegations are intended by Williams to injure and impeach Ramey's reputation and expose Ramey to public hatred, contempt, ridicule, and financial injury. Williams sought to profit from

publishing Ramey's traumatic incident, likely believing that Ramey would not defend himself to keep the matter secret.

68. Williams knew the allegation was false when she made it and made the allegation in an attempt to extort money from Ramey with actual malice and the statements affect Ramey's economic and business interests, including but not limited to the interests of Ramey & Schwaller, LLP, its partners, employees, and clients. Further, Williams made the publications without privilege.

69. Ramey suffered special damages, including loss of income, clients, reputation, legal community standing, his cost of defense, his cost of prosecuting this lawsuit, and his time. Ramey is further entitled to court costs and punitive and exemplary damages to dissuade such conduct from others in the future. Ramey is entitled to court costs and both pre- and post-judgment interest.

#### **IX. PRAYER FOR RELIEF AND JURY DEMAND**

Defendant Ramey demands a jury for all matters triable to a jury. Defendant respectfully requests that Plaintiff Williams take nothing by her action and further request such other relief, in law and equity, to which they may be justly entitled, and that Defendant is awarded damages, exemplary damages, his attorneys' fees, pre and post judgment interest, court costs, and all other relief under law or equity to which it is entitled. Further, Defendant Ramey prays that he is granted damages against Williams in an amount exceeding \$1 million dollars to dissuade future conduct of this nature, as the allegation by Williams are false, salacious and only aimed at embarrassing and destroying Ramey and harming R&S, its partners, its employees and its clients.

Respectfully submitted,

*/s/ Charles H. Peckham*

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument was forwarded to the following on this the 5th day of October 2020 via electronic service:

Kell Simon  
ATTORNEY AT LAW  
501 N. IH 35, Suite 111  
Austin, Texas 78702  
E-Mail Address: [kell@kellsimonlaw.com](mailto:kell@kellsimonlaw.com)

*/s/ Charles H. Peckham*

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Charles H. Peckham