

IN THE CIRCUIT COURT OF WILSON COUNTY, TENNESSEE

NANDIGAM NEUROLOGY, PLC, )  
PLAINTIFF )  
VS. )  
KELLY BEAVERS and )  
DEVIN YOUNT )  
DEFENDANTS. )

CASE NO. 2019-CV-663

2019 NOV 27 PM 2:28  
DEBRA WONG  
CIRCUIT CLERK  
WILSON COUNTY, TN  
FILED #

**COMPLAINT**

Comes now the Plaintiff, NANDIGAM NEUROLOGY, PLC, and complains of Defendants KELLY BEAVERS and DEVIN YOUNT, as follows:

**PARTIES**

1. Plaintiff NANDIGAM NEUROLOGY, PLC (hereinafter referred to as "Plaintiff" or "Plaintiff Nandigam"), is a Tennessee professional limited liability company with its principle office located at 516 Uptown Square, Murfreesboro, TN 37129.
2. Defendant KELLY BEAVERS (hereinafter referred to as "Defendant Beavers") is an adult citizen and resident of Wilson County, Tennessee. Her place of residence is 398 Saundersville Ferry Road, Mt. Juliet, TN 37122.
3. Defendant DEVIN YOUNT (hereinafter referred to as "Defendant Yount") is an adult citizen and resident of Wilson County, Tennessee. Upon information and belief, his place of residence is 3025 Cairns Drive, Mt. Juliet, TN 37122.
4. This Court has jurisdiction over the parties and venue is proper.

**BACKGROUND**

5. Plaintiff Nandigam owns and operates a medical office in Murfreesboro, TN which provides neurology treatment and neurological medical services.
6. In early November 2019, Defendant Beavers accompanied her father to a medical consultation at the office of Plaintiff Nandigam.
7. On November 7, 2019, Defendant Beavers posted a negative Yelp review on the internet regarding Plaintiff Nandigam's medical office which contained false, disparaging, and misleading statements.

8. On November 20, 2019, Defendant Yount additionally posted a negative Google regarding Plaintiff Nandigam's medical office which also contained false, disparaging, and misleading statements. Plaintiff Nandigam has never met Defendant Yount and has never had any contact or communication with Defendant Yount. Plaintiff Nandigam does not even know who Defendant Yount is.

9. Upon information and belief, Defendant Yount was an acquaintance of Defendant Beavers who was specifically recruited by Defendant Beavers for the purpose of posting false and misleading statements on Google concerning Plaintiff Nandigam's medical office.

10. Neither Defendant Beavers nor Defendant Young were ever patients of Plaintiff Nandigam's medical office.

### **COUNT I-DEFAMATION AND LIBEL**

11. Plaintiff Nandigam incorporates each and every allegation set forth above.

12. The actions of Defendant Beavers and Defendant Yount constitute defamation and libel which resulted in injury to Plaintiff Nandigam's business.

13. The actions of Defendant Beavers and Defendant Yount were done in a reckless and/or intentional manner with disregard for the truth and were performed by the Defendants in order to cause damage to Plaintiff's business.

### **COUNT II-FALSE LIGHT**

14. Plaintiff Nandigam incorporates each and every allegation set forth above.

15. The actions of Defendant Beavers and Defendant Yount constitute statements of false light which resulted in injury to Plaintiff Nandigam's business.

16. The actions of Defendant Beavers and Defendant Yount were done in a negligent, reckless, and/or intentional manner and resulted in damage to Plaintiff's business.

### **COUNT III-CONSPIRACY**

17. Plaintiff Nandigam incorporates each and every allegation set forth above.

18. The actions of Defendant Beavers and Defendant Yount constitute a civil conspiracy between the two Defendants which resulted in injury to Plaintiff Nandigam's business.

19. The actions of Defendant Beavers and Defendant Yount were intentionally coordinated by the Defendants in order to cause damage to Plaintiff's business reputation.

### DAMAGES


20. Due to the acts of Defendant Beavers and Defendant Yount, Plaintiff Nandigam suffers from damage to its business reputation, potential loss of patients and business revenue, loss of income, internet “clean up” expenses, and legal expenses.

### PRAYER FOR RELIEF

WHEREFORE, Plaintiff Nandigam Neurology, PLC hereby demands:

1. Process be issued upon the Defendants and an *Answer* to this *Complaint* be filed within the time frame prescribed by law.
2. Judgment be entered against Defendant KELLY BEAVERS and Defendant DEVIN YOUNT, jointly and severally, for an amount to be determined at trial, but no less than \$25,000, with interest and costs.
3. An additional award of punitive damages be entered against both Defendant BEAVERS and Defendant DEVIN YOUNT, jointly and severally, for their actions, with interest and costs.
4. The court award Plaintiff’s attorney fees against Defendants.
5. The court order Defendants to remove their defamatory statements from the internet and to pay for any associated costs for such removal.
6. The court issue an injunction against Defendants prohibiting them from posting any further statements against Plaintiff on the internet.
7. Any further legal and equitable relief to which Plaintiff may be entitled.

RESPECTFULLY SUBMITTED:

  
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ANGELLO L. HUONG #021209  
Attorney for Plaintiff  
435 Park Avenue, Professional Building  
Lebanon, Tennessee 37087  
Phone (615) 453-7530

**SURETY**

I, Angello L. Huong, state that I am the surety for the costs of this case.

  
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ANGELLO L. HUONG