

STATE OF VERMONT
WINDHAM COUNTY, SS.

EFFIE MAYHEW

Plaintiff,

vs.

DAVID DUNN and
LISA LEPAGE & CHRISTOPHER GROTKÉ
D/B/A MUSEARTS INC

Defendant

) SUPERIOR COURT
) WINDHAM

SUMMONS

) Docket No.

COPY

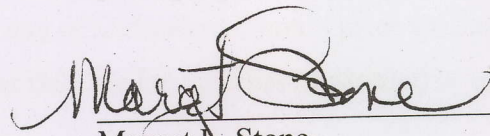
THIS SUMMONS IS DIRECTED TO : DAVID DUNN and
LISA LEPAGE & CHRISTOPHER GROTKÉ D/B/A MUSEARTS INC

1. **YOU ARE BEING SUED.** The plaintiff has started a lawsuit against you. The Plaintiff's Complaint against you is attached to this summons. Do not throw these papers away. They are official papers that affect your rights.
2. **YOU MUST REPLY WITHIN 20* DAYS TO PROTECT YOUR RIGHTS.** You must give or mail the Plaintiff a written response called an Answer within 20* days of the date on which you received this Summons. You must send a copy of your Answer to the Plaintiff's attorney whose address is Stone Law Offices; 120 Western Avenue; Brattleboro, VT 05301. You must also give or mail your Answer to the Court located at PO Box 207, Newfane VT 05345-0207.
3. **YOU MUST RESPOND TO EACH CLAIM.** The Answer is your written response to the Plaintiff's Complaint. In your answer you must state whether you agree or disagree with each paragraph of the Complaint. If you believe the Plaintiff should not be given everything asked for in the Complaint, you must say so in your Answer.
4. **YOU WILL LOSE YOUR CASE IF YOU DO NOT GIVE YOUR WRITTEN ANSWER TO THE COURT.** If you do not Answer within 20* days and file it with the Court, you will lose this case. You will not get to tell your side of the story, and

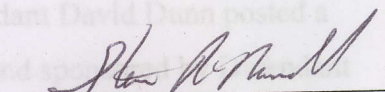
the Court may decide against you and award the Plaintiff everything asked for in the complaint.

5. **YOU MUST MAKE ANY CLAIMS AGAINST THE PLAINTIFF IN YOUR REPLY.** Your Answer must state any elated legal claims you have against the Plaintiff. Your claims against the Plaintiff are called Counterclaims. If you do not make your Counterclaims in writing in your Answer, you may not be able to bring them up at all. Even if you have insurance and the insurance company will defend you, you must still file any Counterclaims you may have.
6. **LEGAL ASSISTANCE.** You may wish to get legal help from a lawyer. If you cannot afford a lawyer you should ask the court clerk for information about places where you can get free legal help. **Even if you cannot get legal help, you must still give the Court a written Answer to protect your rights.**

Dated: November 08, 2007


Margot L. Stone

*Served on 11-13-2007
Date


Deputy Sheriff or Constable

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SUPERIOR COURT
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Docket No.

COMPLAINT

NOW COMES Effie Mayhew by and through her attorney, Margot L Stone, who complains, alleges and states that

1. The Plaintiff is and at all times relevant a resident of Brattleboro, Vermont.
2. The Defendant David Dunn is and at all times relevant a resident of Brattleboro, Vermont.
3. The Defendants Lisa Lepage and Chris Grotke dba MuseArts Inc (MuseArts) conducts business as a terminated Vermont corporation with a principal place of business in Brattleboro, Vermont.

COUNT 1

4. Paragraphs 1-3 are re-asserted as though fully set forth.
5. On or about Wednesday September 26, 2007 Defendant David Dunn posted a “statement” on a website entitled ibrattleboro.com and sponsored by Defendant MuseArts. In his statement was an allegation that the members of Rescue, Inc. who had signed a petition were suspect in their motives.
6. On or about Thursday, September 27, 2007, Plaintiff, a volunteer member of Rescue Inc., sent a letter to the Brattleboro Reformer which responded to some of the accusations of Defendant Dunn. Her response contained some allegations of conduct by Mr. Dunn in direct contravention to the needs and bylaws of the organization. Her letter focused solely on issues pertaining to Rescue, Inc. and its management. The letter was printed in its entirety on the Op-Ed page of the newspaper.

7. On or about Sunday, September 30, 2007, Defendant Dunn authored an article on the website known as ibrattleboro and owned/operated by Defendant MuseArts entitled "Let's Talk FACTS!"
8. Said article begins as follows, "Let's talk facts. Let's stop the speculation, rumor and innuendo – both in the Reformer and here." (*emphasis added*). He states without specificity general sexual liaisons are being conducted on the premises. Then he names Ms. Mayhew, further stating that she is conducting an "affair" with a "married member of the Rescue, Inc. board of trustees" indicating that this behavior was happening during "on call" hours at the agency.
9. Not only was the statement immaterial and irrelevant to the originating issues, but it was unequivocally false.
10. Defendant MuseArts placed a caveat above the title of the article which says in whole, "The following comments are owned by whomever (sic) posted them. This site is not responsible for what they may say."
11. The quote in paragraph 10 does not appear in any of Defendant Dunn's prior writings. The alleged disclaimer is insufficient to escape liability for the libel committed in the article.

COUNT II

12. Paragraphs 1-11 are reiterated here as though fully set forth.
13. As a result of the defamation against the Plaintiff, she has received anonymous telephone calls using the foulest and filthiest language conceivable. Not only has the Plaintiff been deemed a "whore" and a "slut" but a "home wrecker". She has endured and continues to endure psychic pain and anguish and severe emotional distress.
14. As though the gossip and public name calling were not enough, the Plaintiff and her family have actually heard people talking about the "facts" asserted by the Defendants in a completely negative and hostile context.
15. As a direct result of the Defendants' outrageous conduct the Plaintiff is in absolute loss of her reputation by the Defendants' malicious publication.
16. In addition to the other pecuniary losses, the Plaintiff has been terminated from her employment as a proximate cause of the false and scandalous accusation

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WHEREFORE the Plaintiff demands judgment for 1) Libel, 2) Intentional Infliction of Emotional Distress, 3) Punitive Damage for the Maliciousness, and any other damages the trier of fact may deem appropriate and just.

Docket No.

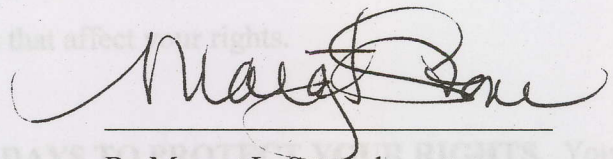
DEMAND FOR JURY TRIAL

Defendant

The Plaintiff in this matter herewith requests a trial by Jury.

Dated at Brattleboro, Vermont this 8th day of November, 2007.

Effie Mayhew



By Margot L. Stone, her attorney

cc: David Dunn
MuseArts Inc.