

IN THE DISTRICT COURT OF CLEVELAND COUNTY  
STATE OF OKLAHOMA

HI TECH AIR SOLUTIONS, LLC, a  
domestic limited liability company;  
RAY ROBISON, an individual,

Plaintiffs;

vs.

HEALTHY HABITATS, LLC, a  
foreign limited liability company;  
CARL GRIMES, an individual,

Defendant.

Case No. CJ-2015-481-V

SUMMONS

To the above-named Defendant: Carl Grimes  
1811 S Quebec Way  
Suite 99  
Denver, CO 80231

You have been sued by the above-named Plaintiff and you are directed to file a written Answer to the attached Petition in the Court at the above address within twenty (20) days after service of this summons upon you, exclusive of the day of service. Within the same time, a copy of your Answer must be delivered or mailed to the attorney for the Plaintiff.

Unless you answer the Petition within the time stated, judgment will be rendered against you with costs of the action.

ISSUED this 22 day of April, 2015.

(seal)

Attorney for Plaintiff:

Chris Hammons, OBA #20233

1230 S.W. 89<sup>th</sup> St., Suite A

Oklahoma City, OK 73139

Telephone: 405.703.4567

Facsimile: 405.703.4061

E-mail: [chris@lhllaw.com](mailto:chris@lhllaw.com)

Rhonda Hall  
COURT CLERK,

Rhonda Hall  
Deputy Court Clerk

YOU MAY SEEK THE ADVICE OF AN ATTORNEY ON ANY MATTER CONNECTED WITH THIS SUIT OR YOUR ANSWER. SUCH ATTORNEY SHOULD BE CONSULTED IMMEDIATELY SO THAT AN ANSWER MAY BE FILED WITHIN THE TIME LIMIT STATED IN THE SUMMONS.



IN THE DISTRICT COURT OF CLEVELAND COUNTY  
STATE OF OKLAHOMA

STATE OF OKLAHOMA } S.S.  
CLEVELAND COUNTY }  
FILED

APR 22 2015

HI TECH AIR SOLUTIONS LLC, a  
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In The Office of the  
Court Clerk RHONDA HALL

Case No. CJ-2015-481-V

ENTRY OF APPEARANCE

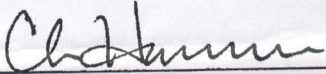
To the Clerk of this Court and all parties of record:

I hereby enter my appearance as counsel in this case for Plaintiffs, Hi Tech Air  
Solutions, LLC, and Ray Robison.

I certify that I am admitted to practice in this Court.

Date

4-22-2015

  
Chris Hammons, OBA #20233  
LAIRD HAMMONS LAIRD, PLLC  
1230 S.W. 89<sup>th</sup> St., Suite A  
Oklahoma City, OK 73139  
Telephone: 405.703.4567  
Facsimile: 405.703.4061  
E-mail: [Chris@lhllaw.com](mailto:Chris@lhllaw.com)  
ATTORNEY FOR PLAINTIFF



IN THE DISTRICT COURT OF CLEVELAND  
STATE OF OKLAHOMA

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PETITION

COME NOW Plaintiffs, Hi Tech Air Solutions, LLC, a domestic limited liability company and Ray Robison, an individual, (hereinafter Plaintiffs) for their cause of action against Defendants, Healthy Habitats, LLC, a foreign limited liability company and Carl Grimes, an individual, (hereinafter Defendants) and state as follows:

THE PARTIES

1. Plaintiff Ray Robison was a citizen and resident of Cleveland County, Oklahoma at all relevant times hereinafter described.
2. Plaintiff Hi Tech Air Solutions, LLC, is a domestic limited liability company that is primarily owned and operated out of Cleveland County, Oklahoma.
3. Defendant Healthy Habitats, LLC, is a Colorado limited liability company.
4. Defendant Carl Grimes was a citizen and resident of Colorado at all relevant times hereinafter described.



### JURISDICTION AND VENUE

5. This is an action arising from Defendant's intentional conduct that was expressly aimed at Plaintiffs and caused harm to the Plaintiffs, the brunt of which was suffered in Oklahoma and which the Defendants knew was likely to be suffered in Oklahoma.
6. Because the intentional conduct was aimed at an individual and business in Cleveland County, Oklahoma, the proper venue is Cleveland County.

### THE CAUSE OF ACTION

7. Ray Robison owns and operates Hi Tech Air Solutions, LLC.
8. Hi Tech Air Solutions sells machines that eradicate mold and toxins.
9. Hi Tech Air Solutions markets its products via sales teams and internet marketing.
10. Hi Tech Air Solutions has received many sales from referrals on Facebook.
11. Carl Grimes owns and operates Healthy Habitats, LLC.
12. Healthy Habitats, LLC is a competitor of Hi Tech Air Solutions, LLC.
13. Carl Grimes, as owner and operator of Healthy Habitats, LLC, is an active participant in online forums concerning machines and services that eradicate mold and toxins.
14. Carl Grimes has made numerous false statements concerning Ray Robison and Hi Tech Air Solutions, LLC.
15. Carl Grimes's false statements were published on Facebook forums where individuals seek information concerning machines and services that eradicate mold and toxins.
16. Carl Grimes published false statements that Hi Tech Air Solutions and Ray Robison practices deception.
17. Carl Grimes published false statements that Hi Tech Air Solutions is a scam.
18. Carl Grimes published false statements that Hi Tech Air Solutions and Ray Robison is preying on mold sensitive people.



19. Carl Grimes has encouraged others to defame Hi Tech Air Solutions.
20. Carl Grimes has encouraged customers of Hi Tech Air Solutions to return the products purchased from Hi Tech Air Solutions.
21. Carl Grimes published false statements about Hi Tech Air Solution's testing methods.
22. Carl Grimes published false statements about Hi Tech Air Solution's and Ray Robison's communications with testing facilities.
23. Carl Grimes's false statements have exposed Plaintiffs to public hatred, contempt, ridicule, and disgrace.
24. Carl Grimes's false statements were communicated to persons other than Plaintiffs.
25. Carl Grimes's false statements were reasonably understood to be about Plaintiffs.
26. Carl Grimes's statements were false.
27. Carl Grimes did not exercise the care which a reasonably careful person would use under the circumstances to determine whether the statements were true or false.
28. Carl Grimes's statements caused Plaintiffs to suffer a financial loss.
29. Carl Grimes's statements caused Plaintiffs to suffer damages to its reputation and/or emotional injury.

#### **FIRST CAUSE OF ACTION: DEFAMATION**

30. Plaintiffs incorporates as if fully restated all of the allegations previously written.
31. Plaintiffs were subjected to public hatred, contempt, ridicule or disgrace and suffered financial loss as a result of Carl Grimes's intentional false statements.

#### **SECOND CAUSE OF ACTION: TORTIOUS INTERFERENCE WITH**

#### **CONTRACT**

32. Plaintiffs incorporates as if fully restated all of the allegations previously written.
33. Plaintiffs had numerous purchasing contracts with customers.



34. Defendants knew, or under the circumstances, reasonably should have known about the contracts.
35. Defendants interfered with the contracts.
36. Defendants induced the customers to breach the contracts.
37. Defendants' actions were intentional.
38. Defendants' used improper or unfair means in interfering with the contracts.
39. As a direct result of Defendants' actions, Plaintiffs have suffered damages.

#### **CAUSATION OF PLAINTIFF'S DAMAGES**

40. As a direct and proximate result of the Defendants' actions, Plaintiff has suffered damages described hereafter.

#### **DAMAGES SUSTAINED BY PLAINTIFFS**

41. Plaintiffs have suffered losses as a result of Defendants' interference with the purchasing contracts.
42. Plaintiffs have suffered financial losses, such as loss of earnings and profits as a result of Defendants' acts of defamation.
43. Plaintiffs have suffered injury to reputation, and standing in the community, as a result of Defendants' acts of defamation.
44. Plaintiffs have suffered personal humiliation as a result of Defendants' acts of defamation.
45. Plaintiffs have suffered mental anguish and suffering as a result of Defendants' acts of defamation.

#### **DEMAND FOR JURY TRIAL**

46. The Plaintiff demands a jury trial for all issues of fact presented by this action.

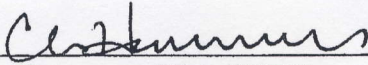


**RESERVATION OF ADDITIONAL CLAIMS**

47. The Plaintiff reserves the right to plead further upon completion of discovery to state additional claims and to name additional parties to this action.

WHEREFORE, Plaintiffs pray for judgment against the Defendants, in a sum in excess of \$10,000, but less than \$75,000 as required for diversity jurisdiction under 28 U.S.C. § 1332 (currently \$75,000.00) plus interest, costs, attorney's fees, punitive damages, and all such other and further relief as to which Plaintiff may be entitled.

Respectfully submitted,

  
Chris Hammons, OBA #20233  
LAIRD HAMMONS LAIRD, PLLC  
1230 S.W. 89<sup>th</sup> St., Suite A  
Oklahoma City, OK 73139  
Telephone: 405.703.4567  
Facsimile: 405.703.4061  
E-mail: [Chris@lhllaw.com](mailto:Chris@lhllaw.com)  
ATTORNEY FOR PLAINTIFF

**ATTORNEY LIEN CLAIMED**