

In The United States District Court For The District of Nebraska

Shannon Williams,  
Plaintiff;

- vs. -

Raymond, Renshaw Pfeiffer Law firm;  
State Officials: Mark Foxhall,  
(Asst. Jail Dir.); Jeffrey Newton,  
(Douglas County Jail Dir.); and  
Terry Haddock (Attorney At Law);  
Defendants.

- 42 U.S.C. § 1983 -  
"Civil Action"

8:09CV467

FILED  
U.S. DISTRICT COURT  
DISTRICT OF NEBRASKA  
09 DEC 28 PM 4:22  
OFFICE OF THE CLERK

Now comes the proise plaintiff Shannon Williams to move, and he will now move this Honorable Court to file and process this 42 U.S.C. § 1983 Civil Action, hereby launched against each and every one of the defendant's stated above.

~ Statement Of Facts ~

The plaintiff, is a jail detainee housed at the Douglas County Jail Facility awaiting trial for Federal Charges against him in this Court. So as to assure "that The Administration of Justice" is NOT obstructed, miscarriaged, and/or misapplied in a prejudice manner, then the Plaintiff hereby Request for this case be properly transferred to another U.S. District Court Jurisdiction to delciate from your HONOR

from being both the trial judge (which he presently is, and has been) over the plaintiff's case as well as the Chief Judge who is already hearing, and has already heard, and ruled in the present civil action which belongs to the plaintiff (who already has a active, yet separate civil action) pending in this Courts Jurisdiction UNDER ADVISORY of the Honorable Judge Bataillon.

Therefore, the plaintiff Request "[VENUE]" of this, civil action filed as denoted to wit:

1. The plaintiff is presently housed at the Douglas County Jail Facility located at 710 S. 17th St., Omaha, NE. 68102; and

2. The plaintiff contends that the defendant(s) acted under the color of state law and Federal law, thus violating state municipal, Attorney Bar Assoc. Rule(s) 1.1 throughout 1.11 Confidentiality Code(s); as well as violation(s) of plaintiff's U.S. Constitutional Right's due him pursuant to the 5th.; 6th.; 8th.; and 14th. Amendment(s) by way of their illegal actions utilized 'under color of state and/or federal law's' to have defamed the plaintiff's character; stole and tricked plaintiff (as well as) plaintiff's relatives out of their

monies to witness a subtotal of six-thousand and five hundred dollars \$6,500.00 which counsel supposedly turned over to the Omaha Police Department, thereby violating "Attorney Client Code of Confidentiality"; and 7500.00 IN RETAINER FEES

3. Since the dates of April 30 2009 throughout December 17 2009 defendant Terry Haddock meet on a weekly basis with the plaintiff while the plaintiff was housed at the Douglas County Jail facility; and

4. During each and every visit conducted by defendant Terry Haddock with plaintiff Shannon Williams, defendant 'Haddock' wore a "Wife Recorder Device" which the defendant personally used under 'color of law' using deception in his malice scheme's which tricked the plaintiff to instill 'all of his trust' in the defendant Attorney at Law Terry Haddock who in turn was working undercover with the Omaha Police Department and the United States Government Officials; and

5. Plaintiff was also deceived by defendant who smuggled in a cellphone which was used by the defendant to build a criminal

case which lead to a criminal indictment to be launched against the ~~P~~laintiff by the United States Government and it's Federal official's; and

6. So, but for defendant Terry Haddock 'usage of deception', (to have been plaintiff's attorney in whom he instilled all trust) then plaintiff would not have ever retained counsel Terry Haddock (Attorney At Law), and nor would have plaintiff ever instilled trust in the defendant. This started with a 7500 payment when I was free on the streets in October of 2008.

7. Subsequently, the plaintiff contends that the defendant's Jeffrey Newton and Mark Foxhall had firsthand and full knowledge of defendant Terry Haddock being (wired) and in possession of a cellphone which all defendant's allowed the plaintiff to use being in violation of Douglas County Jail Policy (as well as) Douglas County Municipal laws due to be followed by all attorney's who visit with jail detainees; and

8. The conspiring of the defendant's 'Newton' and 'Hall' who acted under 'color of state law' as if though they were police official's

along with defendant 'Haddock' to use illegal means to "Entrap" the plaintiff whom had each and every Attorney/Client visit recorded which actions could not have existed, save, but for the assistance that defendant 'Haddock' received from his co-defendant's 'Newton and Foxhall'.

### ~ CLAIMS ~

The plaintiff contends that due to the illegal, corrupt, arbitrary, and unconstitutional actions of all the defendant's has created mental anguish for the plaintiff; and

Plaintiff also contends that he was then, and still remains to be a victim of cruel and most unusual punishments under the custody and control of defendant's 'Newton and Hall', and their host of correctional officials at the Douglas County Jail facility; and

Plaintiff attest to the fact that he has suffered from 'defamation of character' from the actions of the defendant's which lead to a bogus Omaha World Herald News Editorial wrote on 12-19-09 wherein numerous allegations were made against

the plaintiff due to the (action's and information) did by the defendant's; and

Defendant 'Haddock's' owes funds to the plaintiff (alone) for services that were not rendered at the rate of six-thousand five-hundred dollars [6500.00], AND [7500.00] dollar retainer fee.

### Conclusion

Based on all of the above facts the plaintiff hereby request the following rewards as denoted below:

1. Reimbursement of Attorney Fees: \$6500.00 from defendant Terry Haddock (Att. At Law); and 7500 RETAINER FEE; AND

(Damages Requested From All Defendants)

2. Punitive Damages Requested: \$125,000.00

3. Compensatory Damages Requested: \$125,000.00

4. Nominal Damages Requested: \$250,000.00

Estimated Total: \$506,500.00

Any and all other Relief deemed due from the defendant's by this Court is hereby Requested to be gale to the plaintiff.

Respectfully

Submitted:

Sworn Before Me

x Shannon Williams

This day of 20  
(Notary)

Mr. Shannon Williams

710 S. 17th St.

Comm. Ex:

Omaha, NE, 68102

cc: Retained.

RECEIVED

DEC 28 2009

CLERK  
U.S. DISTRICT COURT  
OMAHA

Date Filed: ( )

Omaha, NE.

Mr. Shannon Williams  
710 S. 17th St.  
Omaha, NE. 68102

December 24, 2009

U.S. District Court Clerk

DEAR CLERK OF COURT:

Please find enclosed to be filed with your office:

"The Plaintiff's 42 U.S.C. § 1983 Civil  
Action"

Thank you, for your attention and assistance with this matter. Please file the original, and forward a computer clocked-in copy to me for my files.

Respectfully Submitted:  
Shannon Williams

MR. SHANNON WILLIAMS  
710 S. 17th St.  
OMAHA, NE. 68102

RECEIVED

DEC 28 2009

CLERK  
U.S. DISTRICT COURT  
OMAHA

Shannon Williams  
Printed Name  
( 0436916 ) ( \_\_\_\_\_ )  
Data # Module #

Douglas County  
DEPARTMENT OF CORRECTIONS  
710 SOUTH 17TH STREET  
OMAHA, NEBRASKA 68102

Legal Mail

6810251322

Office of the Clerk  
U.S. District Court  
111 S. 18<sup>th</sup> Plaza Suite 1152  
Omaha, NE 68102

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