

FILED

CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS

2011 JUN 16 A 10:48

STATE OF LOUISIANA

CIVIL DISTRICT COURT DIVISION " "

NO. 14-6068

DALE VELEZ AND THE VELEZ CORPORATION D/B/A CRDN OF LOUISIANA, YOUNG'S DRYCLEANING AND YOUNG'S EXPRESS

VERSUS

NADER ANTHONY ODEH

FILED: _____

DEPUTY CLERK

VERIFIED PETITION FOR A TEMPORARY RESTRAINING ORDER, PRELIMINARY AND PERMANENT INJUNCTION

TO: Nader Anthony Odeh
1 Yellow Stone Court
New Orleans, Louisiana 70131

NOW INTO COURT, through undersigned counsel, come Petitioners, Dale Velez and The Velez Corporation D/B/A CRDN of Louisiana, Young's Drycleaning and Young's Express (hereinafter sometimes referred to as "The Velez Corporation"), who respectfully move this Honorable Court to enter a temporary restraining order without bond pursuant to La. Code of Civ. Proc. art. 3601 *et seq.*, and thereafter, a preliminary and permanent injunction pursuant to La. Code of Civ. Proc. art. 3601 *et seq.*, against Nader Anthony Odeh:

1. restraining, enjoining, and prohibiting Nader Anthony Odeh from coming within 1000 feet of Dale Velez;
2. restraining, enjoining, and prohibiting Nader Anthony Odeh from coming within 1000 feet of any and all employees of The Velez Corporation;
3. restraining, enjoining, and prohibiting Nader Anthony Odeh from coming within 1000 feet of The Velez Corporation located at 5357 Franklin Avenue, New Orleans, Louisiana 70122;
4. restraining, enjoining, and prohibiting Nader Anthony Odeh from any and all contact with Dale Velez including, but not limited to mail, email, facsimile, or telephone;
5. restraining, enjoining, and prohibiting Nader Anthony Odeh from any and all contact with any and all employees of The Velez Corporation including, but not limited to mail, email, facsimile, or telephone;

Petitioners further respectfully represent as follows:

1.

Made defendant herein is Nader Anthony Odeh, a person of full age of majority and domiciled in the Parish of Orleans.

2.

Venue is proper in Orleans Parish pursuant to the Louisiana Code of Civil Procedure.

3.

Nader Anthony Odeh is a manager/member of Claims Consulting & Contracting, L.L.C.; which is a consulting company retained by claimants following a property damage loss.

4.

The Velez Corporation consists of the following companies: CRDN of Louisiana, Young's Drycleaning and Young's Express; which specializes in textile restoration after losses due to fire.

5.

Nader Anthony Odeh and The Velez Corporation often work on the same losses.

6.

On May 12, 2016, undersigned counsel on behalf of Dale Velez and The Velez Corporation issued a Cease and Desist Demand to Nader Anthony Odeh requesting that Odeh cease any and all communications with Dale Velez and The Velez Corporation.¹

7.

Prior to the issuance of the aforementioned Cease and Desist Demand, Nader Anthony Odeh on multiple occasions has verbally harassed, verbally intimidated, physically intimidated, and threatened physical violence against Dale Velez and the employees of The Velez Corporation.²

8.

On one occasion Nader Anthony Odeh visited The Velez Corporation located at 5357 Franklin Avenue, New Orleans, Louisiana 70122 to view the contents of a claimant.³ At that

¹ Cease and Desist Demand to Nader Anthony Odeh dated May 12, 2016, attached hereto as Exhibit "A".

² Affidavit of Dale Velez, attached hereto as Exhibit "B" and Affidavit of Megan Giroir, attached hereto as Exhibit "C".

³ Affidavit of Dale Velez, attached hereto as Exhibit "B".

time, Odeh attempted to bribe Dale Velez for a discount.⁴ When Mr. Velez refused, Odeh told him: “You don’t know who the f*** you are dealing with” and threatened to kick Mr. Velez’s ass.⁵

9.

On each occasion The Velez Corporation has worked on a claim that Nader Anthony Odeh is involved with, Odeh’s conduct has been a consistent pattern of interference, threats, intimidation, bullying, and harassment toward Dale Velez and the employees of The Velez Corporation.⁶

10.

Despite receipt of the Cease and Desist Demand, on May 24, 2016, the most recent incident of harassment and threats, Nader Anthony Odeh contacted Young’s Drycleaning, a company owned by Dale Velez and a part of The Velez Corporation, *via* telephone and hung up.

11.

Shortly thereafter, Dorothy Payne contacted Young’s Drycleaning, a company owned by Dale Velez and a part of The Velez Corporation, *via* telephone, using the same telephone number as Nader Anthony Odeh did previously, and inquired when her contents would be delivered to her residence.

12.

Later that day on May 24, 2016, two (2) employees of The Velez Corporation, Shawn Handy and Mervin Trepagnier, delivered contents to the residence of Dorothy Payne and Excell Payne located at 204 Bon Crest Avenue, Baton Rouge, Louisiana 70807.⁷ At the time of delivery, Nader Anthony Odeh was present.⁸ This was clearly a set up situation by Odeh.

13.

The employees of The Velez Corporation refused to deliver the contents without the signature of Dorothy Payne or Excell Payne, the owners of the contents, as this is standard protocol when delivering contents to customers.⁹ Immediately, Nader Anthony Odeh became irate and aggressively grabbed the delivery paperwork out of the hands of Mr. Handy causing

⁴ *Id.*

⁵ *Id.*

⁶ *Id.*

⁷ Affidavit of Shawn Handy, attached hereto as Exhibit “D” and Affidavit of Mervin Trepagnier, attached hereto as Exhibit “E”.

⁸ *Id.*

⁹ *Id.*

said paperwork to tear and fall to the ground.¹⁰ Immediately, Mr. Trepagnier attempted to pick up the paperwork from the ground; however, Odeh hit Mr. Trepagnier with his elbow, grabbed the paperwork and placed it down his pants.¹¹

14.

Some moments later, Dorothy Payne retrieved the delivery documents from Nader Anthony Odeh and signed the torn delivery documents as requested by The Velez Corporation employees.¹² Thereafter, the employees of The Velez Corporation hastily delivered eighty (80) bags of Ms. Payne's contents which took approximately seventy-three (73) minutes and immediately left the residence.¹³

15.

While delivering said contents, the employees of The Velez Corporation were constantly berated, threatened, harassed, cursed at, screamed at, and intimidated by Nader Anthony Odeh.¹⁴ The employees of The Velez Corporation feared for their safety due to Odeh's aggressive conduct.¹⁵

16.

Petitioners are concerned for their safety and the safety of its employees, as Nader Anthony Odeh presents a potential danger to Dale Velez and any and all employees of The Velez Corporation.¹⁶

17.

Dale Velez, The Velez Corporation and any and all employees of The Velez Corporation, will suffer immediate and irreparable injury, loss, and damage of a result of Nader Anthony Odeh's aforementioned conduct unless Odeh is temporarily restrained and enjoined. Odeh's aggressive and threatening conduct will continue until and unless he is temporarily restrained and enjoined.

Based on the foregoing, petitioners, Dale Velez and The Velez Corporation D/B/A CRDN of Louisiana, Young's Drycleaning and Young's Express, contend that they are entitled

¹⁰ *Id.*

¹¹ *Id.*

¹² *Id.*

¹³ *Id.*

¹⁴ *Id.*

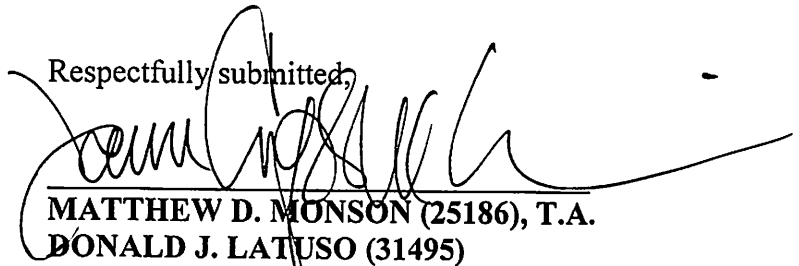
¹⁵ *Id.*

¹⁶ Affidavit of Dale Velez, attached hereto as Exhibit "B", Affidavit of Megan Giroir, attached hereto as Exhibit "C", Affidavit of Shawn Handy, attached hereto as Exhibit "D" and Affidavit of Mervin Trepagnier, attached hereto as Exhibit "E".

to have a temporary restraining order, preliminary injunction and permanent injunction directed to defendant, Nader Anthony Odeh.

WHEREFORE, petitioners, Dale Velez and The Velez Corporation D/B/A CRDN of Louisiana, Young's Drycleaning and Young's Express, respectfully request that this Honorable Court grant the temporary restraining order enjoining Nader Anthony Odeh from: coming within 1000 feet of Dale Velez; coming within 1000 feet of any and all employees of The Velez Corporation; coming within 1000 feet of The Velez Corporation located at 5357 Franklin Avenue, New Orleans, Louisiana 70122; any and all contact with Dale Velez by any method including, but not limited to mail, email, facsimile, or telephone; and any and all contact with any and all employees of The Velez Corporation by any method including, but not limited to mail, email, facsimile, or telephone.

Respectfully submitted,



MATTHEW D. MONSON (25186), T.A.
DONALD J. LATUSO (31495)
SARAH MURPHY BARRO (31893)
LAURA H. ABEL (33175)
JANNA CAMPBELL UNDERHILL (34796)
THE MONSON LAW FIRM, LLC
900 W. Causeway Approach, Suite A
Mandeville, Louisiana 70471
Telephone: (985) 778-0678
Facsimile: (985) 778-0682
Counsel for Petitioners,
Dale Velez and The Velez Corporation

FILED

CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS 2016 JUN 16 A 10:48

STATE OF LOUISIANA

CIVIL DISTRICT COURT DIVISION " "

NO.

DALE VELEZ AND THE VELEZ CORPORATION D/B/A CRDN OF LOUISIANA, YOUNG'S DRYCLEANING AND YOUNG'S EXPRESS

VERSUS

NADER ANTHONY ODEH

FILED: _____ DEPUTY CLERK

AFFIDAVIT AND CERTIFICATION

STATE OF LOUISIANA

PARISH OF ST. TAMMANY

BEFORE ME, the undersigned authority, personally came and appeared:

JANNA CAMPBELL UNDERHILL

who, after first being duly sworn, did depose and state the following:

- 1. That she is the attorney for petitioners, Dale Velez and The Velez Corporation, in the above and foregoing action.
2. That in connection with the Verified Petition for Temporary Restraining Order, Preliminary and Permanent Injunction, Nader Anthony Odeh should not be provided notice.
3. Nader Anthony Odeh may cause immediate and irreparable injury, loss or damage, not compensable by money damages, to petitioners, Dale Velez, The Velez Corporation, and any and all employees of The Velez Corporation, before Odeh can be heard in opposition to the request for a temporary restraining order.
4. This affidavit and certification is executed pursuant to Louisiana Code of Civil Procedure article 3603, and under penalty of the Louisiana Perjury Statute.

[Handwritten signature of Janna Campbell Underhill]
JANNA CAMPBELL UNDERHILL

Sworn to and subscribed before me this 16th day of June, 2016.

[Handwritten signature of Laura H. Abel]
NOTARY PUBLIC
LAURA H. ABEL
LOUISIANA BAR ROLL NO. 33175

FILED

CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS JAN 16 A 10:48

STATE OF LOUISIANA

NO. 16-6008

CIVIL
DIVISION " "

DALE VELEZ AND THE VELEZ CORPORATION D/B/A CRDN OF LOUISIANA,
YOUNG'S DRYCLEANING AND YOUNG'S EXPRESS

VERSUS

NADER ANTHONY ODEH

FILED: _____
DEPUTY CLERK

ORDER

Considering the Verified Petition for a Temporary Restraining Order, Preliminary and Permanent Injunction, and the Court being satisfied with the specific facts alleged therein, and considering the applicable law involved,

AND IT APPEARING to the Court, that Nader Anthony Odeh presents a potential danger to Dale Velez;

AND IT FURTHER APPEARING to the Court, that Nader Anthony Odeh presents a potential danger to any and all employees of The Velez Corporation,

AND IT FURTHER APPEARING that Dale Velez, The Velez Corporation, and any and all employees of The Velez Corporation, will suffer immediate and irreparable injury, loss, and damage as a result of Odeh's aforementioned conduct unless Nader Anthony Odeh is temporarily restrained and enjoined;

IT IS HEREBY ORDERED, ADJUDGED AND DECREED by the Court that Nader Anthony Odeh is hereby **temporarily restrained, enjoined, and prohibited** from:

1. coming within 1000 feet of Dale Velez;
2. coming within 1000 feet of any and all employees of The Velez Corporation;
3. coming within 1000 feet of The Velez Corporation located at 5357 Franklin Avenue, New Orleans, Louisiana 70122;
4. any and all contact with Dale Velez by any method including, but not limited to mail, email, facsimile, or telephone; and,
5. any and all contact with any and all employees of The Velez Corporation by any method including, but not limited to mail, email, facsimile, or telephone.

IT IS FURTHER ORDERED by the Court that the Defendant show cause before this Honorable Court on the 27 day of June, 2016 at 10:00A a.m., why a preliminary writ of injunction in the form and substance of the above Temporary Restraining Order should not be issued herein to be effective during the pendency of these proceedings,

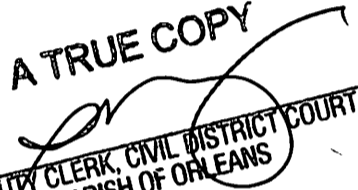
THIS ORDER SIGNED AT New Orleans, Louisiana, on the 10 day of June, 2016, at 11:40 o'clock A.m.

Paula A. Brown
Judge-Division J

District Judge

Please Serve: Along with Verified Petition for a Temporary Restraining Order, Preliminary and Permanent Injunction

Nader Anthony Odeh
1 Yellow Stone Court
New Orleans, Louisiana 70131

A TRUE COPY

DEPUTY CLERK, CIVIL DISTRICT COURT
PARISH OF ORLEANS



THE MONSON
LAW FIRM, LLC

FILED

2016 JUN 16 A 10:48

CIVIL
DISTRICT COURT

Matthew D. Monson
Admitted in Louisiana and Texas
Matthew@MonsonFirm.com

Please Respond to New Orleans Office

May 12, 2016

**Via Email, U.S. Mail and
Certified Mail/Return Receipt Requested**

RRR No.: 7015 1520 0001 4738 8594

anthony@cccrcorecovery.com

N. Anthony Odeh
Claims Consulting and Contracting, LLC
2920 Kingman Street, Suite 116
Metairie, Louisiana 70065

CEASE AND DESIST DEMAND

Dear Mr. Odeh:

Please be advised that our firm represents Dale Velez and CRDN of Louisiana hereinafter collectively referred to as "Mr. Velez and CRDN"). This CEASE AND DESIST DEMAND is to inform you that you are ordered to cease any and all communications with Mr. Velez, CRDN and/or its employees immediately. This includes, but is not limited to, written communication, telephonic communication, and/or physical communication at one of their offices. Any necessary communication or contact with Mr. Velez and CRDN should be directed to our office effective immediately.

This CEASE AND DESIST DEMAND is to further inform you that your persistent actions, including but not limited to, defamatory comments regarding Mr. Velez and CRDN and the employees thereof, harassment and intimidation of Mr. Velez and CRDN and the employees thereof, and physical intimidation to the employees of CRDN, have become unbearable. You are ordered to stop such activities immediately as they are being done in violation of the law. If you continue to pursue these activities in violation of this CEASE AND DESIST DEMAND, we will not hesitate to pursue further legal action against you, including but not limited to, civil action and/or criminal complaints.

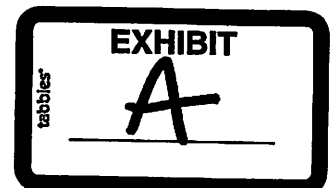
Our clients have the right to remain free from these activities as they constitute a violation of the law. As such, we will pursue any legal remedies available if these activities continue.

New Orleans Office:
900 West Causeway Approach, Suite A
Mandeville, Louisiana 70471
P: 985-778-0678 F: 985-778-0682



Houston Office:
2800 Post Oak Blvd., Suite 4100
Houston, Texas 77056
P: 832-390-2243 F: 832-390-2350

www.MonsonFirm.com
1-855-2-MONSON



N. Anthony Odeh
May 12, 2016
Page 2

Accordingly, you must IMMEDIATELY STOP the harassing and intimidating actions, including but not limited to those acts set forth above. Should you willfully choose to continue your current course of action, we will not hesitate to seek further legal action.

This correspondence does not constitute an exhaustive statement of our position nor is it a waiver of any of our rights and/or remedies in this and/or any other related matter. We demand your immediate compliance.

If you have any questions regarding the above, please do not hesitate to call.

With best regards, I remain

Sincerely,

A handwritten signature in black ink that reads "Matthew Monson". The signature is written in a cursive style with a long, sweeping underline.

Matthew D. Monson

MDM/jcu

Kelli Platt

From: Kelli Platt
Sent: Thursday, May 12, 2016 5:08 PM
To: 'anthony@cccurecovery.com'
Cc: Janna Underhill (janna@monsonfirm.com)
Subject: Cease and Desist Demand re CRDN
Attachments: Odeh 16-05-12.pdf

Mr. Odeh,

Attached please find correspondence from Mr. Monson. Thank you.

Best regards,

Kelli Platt

Legal Assistant



THE MONSON
LAW FIRM, LLC

900 West Causeway Approach, Suite A

Mandeville, Louisiana 70471

Phone: 985-778-0678

Fax: 985-778-0682

Email: Kelli@MonsonFirm.com

CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS

STATE OF LOUISIANA

NO.

DIVISION “ ”

DALE VELEZ AND THE VELEZ CORPORATION D/B/A CRDN OF LOUISIANA,
YOUNG’S DRYCLEANING AND YOUNG’S EXPRESS

VERSUS

NADER ANTHONY ODEH

FILED: _____
DEPUTY CLERK

AFFIDAVIT OF DALE VELEZ

STATE OF LOUISIANA

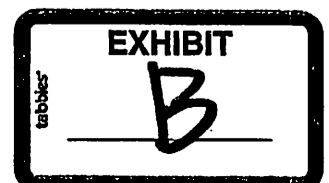
PARISH OF ORLEANS

BEFORE ME, the undersigned authority, personally came and appeared:

DALE VELEZ

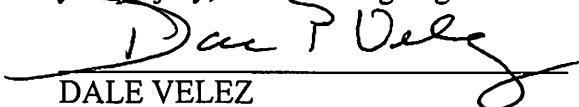
who, after first being duly sworn, did depose and state the following:

1. That he is of the full age of majority and domiciled in the Parish of Jefferson, State of Louisiana;
2. That he is the owner of The Velez Corporation;
3. That The Velez Corporation consists of the following businesses: CRDN of Louisiana, Young’s Drycleaning and Young’s Express;
4. That The Velez Corporation specializes in textile restoration following a fire loss;
5. That he has witnessed Nader Anthony Odeh on multiple occasions verbally harass, verbally intimidate, physically intimidate, insult, and threaten physical violence against he and the employees of The Velez Corporation;
6. That Nader Anthony Odeh recently came to the business location of CRDN of Louisiana located at 5357 Franklin Avenue, New Orleans, Louisiana 70122, and attempted to bribe him for a discount. When he refused said bribe, Odeh told him: “You don’t know who the f*** you are dealing with”;
7. That also after he refused Nader Anthony Odeh’s bribe, Odeh threatened to “kick his ass”;
8. That on May 12, 2016, he retained the Monson Law Firm, LLC to issue a Cease and Desist Demand to Nader Anthony Odeh requesting that Odeh cease and desist any and all communications with he, The Velez Corporation, and any and all employees of The Velez Corporation;
9. That despite the Cease and Desist Demand issued to Nader Anthony Odeh, Odeh continues to verbally harass, verbally intimidate, physically intimidate, insult, and threaten physical violence against he and the employees of The Velez Corporation;



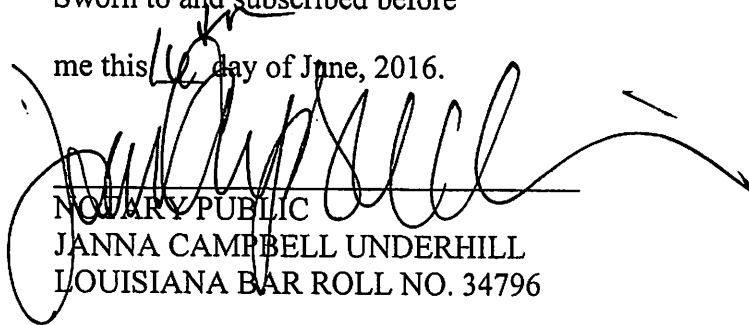
10. That on May 24, 2016, Nader Anthony Odeh contacted Young's Drycleaning, a company owned by him and a part of The Velez Corporation, *via* telephone and hung up;
11. That Dorothy Payne immediately contacted Young's Drycleaning, a company owned by him and a part of The Velez Corporation, *via* telephone after Nader Anthony Odeh's initial contact, using the same telephone number as Odeh did previously, and inquired when her contents would be delivered to her residence;
12. That later that day on May 24, 2016, two (2) employees of The Velez Corporation, Shawn Handy and Mervin Trepagnier, delivered contents to the residence of Dorothy Payne and Excell Payne located at 204 Bon Crest Avenue, Baton Rouge, Louisiana 70807. At the time of delivery, Nader Anthony Odeh was present;
13. That The Velez Corporation employees, Shawn Handy and Mervin Trepagnier, immediately informed him that Nader Anthony Odeh verbally threatened, harassed, intimidated, cursed, and physically harmed Mr. Trepagnier; and,
14. That he fears for his safety and the safety of the employees of The Velez Corporation due to Nader Anthony Odeh's aggressive and threatening conduct.

I declare, under penalty of perjury, that the foregoing is true and correct.


DALE VELEZ

Sworn to and subscribed before

me this 16 day of June, 2016.


NOTARY PUBLIC
JANNA CAMPBELL UNDERHILL
LOUISIANA BAR ROLL NO. 34796

CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS

STATE OF LOUISIANA

NO.

DIVISION “ ”

DALE VELEZ AND THE VELEZ CORPORATION D/B/A CRDN OF LOUISIANA,
YOUNG’S DRYCLEANING AND YOUNG’S EXPRESS

VERSUS

NADER ANTHONY ODEH

FILED: _____
DEPUTY CLERK

AFFIDAVIT OF MEGAN GIROIR

STATE OF LOUISIANA

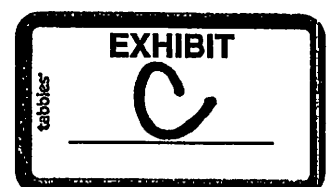
PARISH OF ORLEANS

BEFORE ME, the undersigned authority, personally came and appeared:

MEGAN GIROIR

who, after first being duly sworn, did depose and state the following:

1. That she is of the full age of majority and domiciled in the Parish of Jefferson, State of Louisiana;
2. That she is currently employed as the Restoration Manager of CRDN of Louisiana, a company owned by Dale Velez and a part of The Velez Corporation;
3. That The Velez Corporation consists of the following businesses: CRDN of Louisiana, Young’s Drycleaning and Young’s Express;
4. That as the Restoration Manager for CRDN of Louisiana, she is the custodian of records for and privy to the facts and circumstances surrounding services performed for various homeowners that also retain Nader Anthony Odeh;
5. That on each occasion CRDN of Louisiana has worked on a claim that Nader Anthony Odeh is involved with, Odeh’s conduct has been a consistent pattern of interference, threats, intimidation, bullying, and harassment toward her, Dale Velez and the employees of The Velez Corporation;
6. That she has been verbally threatened, intimidated, bullied, and harassed on multiple occasions by Nader Anthony Odeh;
7. That Nader Anthony Odeh has made derogatory and vulgar statements towards her on multiple occasions;
8. That as the Restoration Manager for CRDN, she is the custodian of records for and privy to the facts and circumstances surrounding services performed for Dorothy Payne and Excell Payne as a result of a fire that occurred in April 2, 2016;



9. That on May 24, 2016, she saw Nader Anthony Odeh's telephone number appear on the caller identification of Young's Drycleaning, a company owned by Dale Velez and a part of The Velez Corporation; subsequently, Mr. Odeh hung up;
10. That Dorothy Payne immediately contacted Young's Drycleaning, a company owned by Dale Velez and a part of The Velez Corporation, *via* telephone after Nader Anthony Odeh's initial contact, using the same telephone number as Odeh did previously, and inquired when her contents would be delivered to her residence;
11. That later that day on May 24, 2016, two (2) employees of The Velez Corporation, Shawn Handy and Mervin Trepagnier, delivered contents to the residence of Dorothy Payne and Excell Payne located at 204 Bon Crest Avenue, Baton Rouge, Louisiana 70807. At the time of delivery, Nader Anthony Odeh was present;
12. That The Velez Corporation employees, Shawn Handy and Mervin Trepagnier, immediately informed her and Dale Velez that Nader Anthony Odeh verbally threatened, harassed, intimidated, cursed, and physically harmed Mr. Trepagnier; and,
13. That she fears for her safety due to Nader Anthony Odeh's aggressive and threatening conduct.

I declare, under penalty of perjury, that the foregoing is true and correct.



MEGAN GIROIR

Sworn to and subscribed before

me this 16 day of June, 2016.



NOTARY PUBLIC
JANNA CAMPBELL UNDERHILL
LOUISIANA BAR ROLL NO. 34796

CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS
STATE OF LOUISIANA

NO.

DIVISION " "

DALE VELEZ AND THE VELEZ CORPORATION D/B/A CRDN OF LOUISIANA,
YOUNG'S DRYCLEANING AND YOUNG'S EXPRESS

VERSUS

NADER ANTHONY ODEH

FILED: _____
DEPUTY CLERK

AFFIDAVIT OF SHAWN HANDY

STATE OF LOUISIANA

PARISH OF Orleans

BEFORE ME, the undersigned authority, personally came and appeared:

SHAWN HANDY

who, after first being duly sworn, did depose and state the following:

1. That he is of the full age of majority and domiciled in the Parish of Jefferson, State of Louisiana;
2. That he is a Customer Service Representative for CRDN of Louisiana, a company owned by Dale Velez and a part of The Velez Corporation;
3. That on May 24, 2016, he and Mervin Trepagnier, another Customer Service Representative for CRDN, delivered contents to the residence of Dorothy Payne and Excell Payne located at 204 Bon Crest Avenue, Baton Rouge, Louisiana 70807;
4. That at the time of delivery Nader Anthony Odeh was present at the residence of Dorothy Payne and Excell Payne;
5. That Nader Anthony Odeh was aggressive and purposefully interfered in the delivery of Dorothy Payne and Excell Payne's contents;
6. That as a standard protocol delivery paperwork must be signed by the owner of the contents;
7. That Nader Anthony Odeh aggressively grabbed the delivery paperwork out of his hands causing said paperwork to tear and fall to the ground;
8. That Mr. Trepagnier of CRDN attempted to pick up said paperwork, however, Nader Anthony Odeh hit Mr. Trepagnier with his elbow, picked up the paperwork, and placed the paperwork down his pants;
9. That eventually Dorothy Payne signed the paperwork;



10. That he and Mr. Trepagnier hastily delivered eighty (80) bags of contents to Dorothy Payne while Nader Anthony Odeh constantly berated, harassed, cursed, screamed at, and intimidated them; and,
11. That he feared for his safety due to Nader Anthony Odeh's aggressive conduct.

I declare, under penalty of perjury, that the foregoing is true and correct.

Shawn Handy
SHAWN HANDY

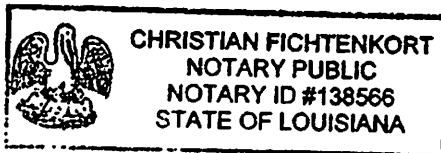
SWORN TO AND SUBSCRIBED
BEFORE ME THIS 16 DAY
OF JUNE, 2016.

Christian Fichtenkort
NOTARY PUBLIC

Christian Fichtenkort
PRINTED NAME

NOTARY NUMBER 138566

My commission expires: for life



CIVIL DISTRICT COURT FOR THE PARISH OF ORLEANS
STATE OF LOUISIANA

NO.

DIVISION " "

DALE VELEZ AND THE VELEZ CORPORATION D/B/A CRDN OF LOUISIANA,
YOUNG'S DRYCLEANING AND YOUNG'S EXPRESS

VERSUS

NADER ANTHONY ODEH

FILED: _____
DEPUTY CLERK

AFFIDAVIT OF MERVIN TREPAGNIER

STATE OF LOUISIANA

PARISH OF Orleans

BEFORE ME, the undersigned authority, personally came and appeared:

MERVIN TREPAGNIER

who, after first being duly sworn, did depose and state the following:

1. That he is of the full age of majority and domiciled in the Parish of Orleans, State of Louisiana;
2. That he is a Customer Service Representative for CRDN of Louisiana, a company owned by Dale Velez and a part of The Velez Corporation;
3. That on May 24, 2016, he and Shawn Handy, another Customer Service Representative for CRDN, delivered contents to the residence of Dorothy Payne and Excell Payne located at 204 Bon Crest Avenue, Baton Rouge, Louisiana 70807;
4. That at the time of delivery Nader Anthony Odeh was present at the residence of Dorothy Payne and Excell Payne;
5. That Nader Anthony Odeh was aggressive and purposefully interfered in the delivery of Dorothy Payne and Excell Payne's contents;
6. That as a standard protocol delivery paperwork must be signed by the owner of the contents;
7. That Nader Anthony Odeh aggressively grabbed the delivery paperwork out of Mr. Handy's hands causing said paperwork to tear and fall to the ground;
8. That he attempted to pick up said paperwork, however, Nader Anthony Odeh hit him with his elbow, picked up the paperwork, and placed the paperwork down his pants;
9. That eventually Dorothy Payne signed the paperwork;



10. That he and Mr. Handy hastily delivered eighty (80) bags of contents to Dorothy Payne while Nader Anthony Odeh constantly berated, harassed, cursed, screamed at, and intimidated them; and,
11. That he feared for his safety due to Nader Anthony Odeh's aggressive conduct.

I declare, under penalty of perjury, that the foregoing is true and correct.


MERVIN TREPAGNIER

SWORN TO AND SUBSCRIBED
BEFORE ME THIS 16 DAY
OF JUNE, 2016.


NOTARY PUBLIC

Christian Fichtenkort
PRINTED NAME

NOTARY NUMBER 138566

My commission expires: for life

