

M.O. 2 NS/d

NIF
12-4

N/a

No. 21-CI-000826

JEFFERSON CIRCUIT COURT
DIVISION ONE-2
JUDGE ANNIE O'CONNELL

DAVID B. MOUR

PLAINTIFF

v.

VERIFIED RESPONSE TO CR 77.02 NOTICE

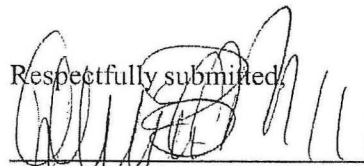
KENDRICK L. WILSON

DEFENDANT

* * * *

Comes Plaintiff, by counsel, and verification, and in response to the Court's CR 77.02 Notice, advises on July 29, 2021 he filed a Motion to Compel Defendant to appear for a deposition for which Mr. Wilson had been noticed on two different occasions and failed to appear oneither of said dates. Said Motion was heard on August 2, 2021, the Court took same under submission and the Parties are still awaiting a ruling. Accordingly, it is Plaintiff's intention to proceed with this matter and any delay is not chargeable to Plaintiff and the case should remain active.

Respectfully submitted,



DAVID B. MOUR

513 S. Second Street

Louisville, KY 40202

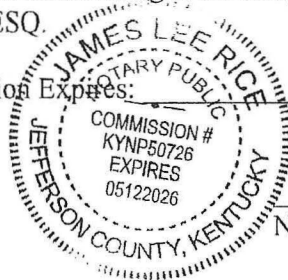
dmour@louisvillefirm.com*Counsel for Plaintiff*

COMMONWEALTH OF KENTUCKY

COUNTY OF JEFFERSON

Subscribed and acknowledged the foregoing on this the 28th day of November, 2023, by
DAVID B. MOUR, ESQ.

My Commission Expires: _____



James Lee Rice
NOTARY, State at Large, KY

CERTIFICATE

I certify a copy hereof was electronically served on the following person on November
28, 2023.

Kendrick Wilson
415 Red Crest Dr.
Shepherdsville, KY 40165
wilsonkendrick1216@gmail.com
Kendrick.wilson16@yahoo.com

/s/ David B. Mour
DAVID B. MOUR, Esq.

Commonwealth of Kentucky

AOC - S - 050 (NDLP)

Court of Justice



**Notice to Dismiss for
Lack of Prosecution**

Case: 21-CI-000826

Court: CIRCUIT D.V. 2

County: JEFFERSON

Pursuant to CR 77.02(2)/ RCr 13.03, notice is hereby given to the parties listed below that no pretrial step has been taken in this action within the last year and the case will be dismissed in 30 days for want of prosecution unless there is filed in the record prior thereto a pleading, with affidavit, showing good cause why no steps have been taken of record for more than one year. The court will enter an order dismissing without prejudice each case in which no answer or an insufficient answer to this notice is made.

MOUR, DAVID B. VS. WILSON, KENDRICK L

MOUR, DAVID B.

PLAINTIFF / PETITIONER

MOUR, DAVID BRADLEY
LAW OFFICE OF DAVID B. MOUR
513 S. SECOND STREET
LOUISVILLE KY 40202

ATTORNEY FOR PLAINTIFF

WILSON, KENDRICK L
415 RED CREST DRIVE
SHEPHERDSVILLE KY 40165

DEFENDANT / RESPONDENT

Circuit/District Clerk, DAVID NICHOLSON

Date: 10/25, 20 23

By _____, DC

I hereby certify that I have served a true copy of this notice on all parties listed herein by mailing a copy to their attorneys of record, postage prepaid.

FILED

Date:

Circuit/District Clerk,
DAVID NICHOLSON

By _____, DC



Commonwealth of Kentucky

AOC - S - 050 (NDLP)

Court of Justice



**Notice to Dismiss for
Lack of Prosecution**

Case: 21-CI-000826

Court: CIRCUIT

County: JEFFERSON

Pursuant to CR 77.02(2), notice is hereby given to the parties listed below that no pretrial step has been taken in this action within the last year and the case will be dismissed in 30 days for want of prosecution unless there is filed in the record prior thereto a pleading, with affidavit, showing good cause why no steps have been taken of record for more than one year. The court will enter an order dismissing without prejudice each case in which no answer or an insufficient answer to this notice is made.

MOUR, DAVID B. VS. WILSON, KENDRICK L

MOUR, DAVID B.

PLAINTIFF / PETITIONER

MOUR, DAVID BRADLEY
LAW OFFICE OF DAVID B. MOUR
513 S. SECOND STREET
LOUISVILLE KY 40202

ATTORNEY FOR PLAINTIFF

WILSON, KENDRICK L
415 RED CREST DRIVE
SHEPHERDSVILLE KY 40165

DEFENDANT / RESPONDENT

Circuit/District Clerk, DAVID NICHOLSON

Date: 08-25, 2022By E.D, DC

I hereby certify that I have served a true copy of this notice on all parties listed herein by mailing a copy to their attorneys of record, postage prepaid.

FILED

Date: 08-25-22
Circuit/District Clerk,
DAVID NICHOLSON

By E.D, DC

CASE NO: 21-CI-000826	DATE: 7-7-2021
PLAINTIFF DAVID B MOUR ✓	ATTY: MOUR ✓
DEFENDANT: KENDRICK L. WILSON ✓	ATTY: PRO-SE
NOTES: Default on liability - injunctive relief ✓ - money damages ✓ - submission	

No. 21-CI-000826

JEFFERSON CIRCUIT COURT
DIVISION ONE
JUDGE ANNIE O'CONNELL

DAVID B. MOUR

PLAINTIFF

v.

ORDER

KENDRICK L. WILSON

DEFENDANT

* * * *

Upon Motion of the Plaintiff, David B. Mour, and the Court being otherwise sufficiently advised;

IT IS HEREBY ORDERED that Defendant, Kendrick L. Wilson, shall appear on November 11, 2022 at 10:30 a.m. at the Office of David B. Mour, 513 S. Second Street, Louisville, KY 40202 for the Plaintiff to take Defendant, Kendrick L. Wilson's deposition. IT IS FURTHER ORDERED Plaintiff is awarded \$550.00 for time and costs associated with Defendant Kendrick L. Wilson's failure to appear.

Annie O'Connell
JUDGE, JEFFERSON CIRCUIT COURT

ENTERED: 10/17/2022

Tendered by:

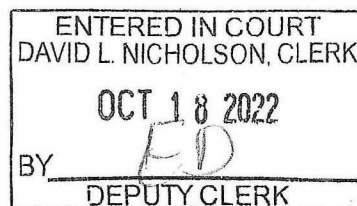
/s/ David B. Mour

DAVID B. MOUR, ESQ.

513 S. Second Street

Louisville, KY 40202

Phone: (502) 473-6464



TD: 000001 of 000001

No. 21-CI-000826

JEFFERSON CIRCUIT COURT

DIVISION ONE

JUDGE ANNIE O'CONNELL

DAVID B. MOUR

PLAINTIFF

v.

NOTICE - RENEWED MOTION-ORDER
COMPELLING APPEARANCE

KENDRICK L. WILSON

DEFENDANT

TO: Kendrick L. Wilson
415 Red Crest Drive
Shepherdsville, KY 40165
wilsonkendrick1216@gmail.com
Kenndrick.wilson16@yahoo.com

* * * *

Take notice that on Monday, October 17, 2022 at 9:15 a.m. ET, or as soon as may be heard, Plaintiff, David B. Mour, will make the motion and tender the following order in the above courtroom.

CERTIFICATE

I certify a copy hereof was served via U.S. Postal Service and/or electronic service on October 12, 2022.

COM : 000001 of 000002

MOTION

Comes Plaintiff David B. Mour, ("**Mour**") and moves the Court to enter the following Order compelling the appearance of Kendrick L. Wilson at the date and time set forth in the Order tendered herewith. The Court signed and entered the Order which was tendered by the Plaintiff at the October 10, 2022 Motion Hour, however, the Order tendered was stale as it was the same Order tendered with the original Motion to Compel. Plaintiff files herewith a correct Order and accordingly, the Court is urged to enter the tendered Order.

Respectfully Submitted,

/s/ David B. Mour

DAVID B. MOUR, ESQ.

513 S. Second Street

Louisville, KY 40202

Phone: (502) 473-6464

Fax: (502) 473-6462

dmour@louisvillefirm.com

Counsel for Plaintiff

No. 21-CI-000826

JEFFERSON CIRCUIT COURT
DIVISION ONE
JUDGE ANNIE O'CONNELL

DAVID B. MOUR

PLAINTIFF

v.

ORDER

KENDRICK L. WILSON

DEFENDANT

* * * *

Upon Motion of the Plaintiff, David B. Mour, and the Court being otherwise sufficiently advised;

IT IS HEREBY ORDERED that Defendant, Kendrick L. Wilson, shall appear on August 12, 2021 at 10:30 a.m. at the Office of David B. Mour, 513 S. Second Street, Louisville, KY 40202 for the Plaintiff to take Defendant, Kendrick L. Wilson's deposition. IT IS FURTHER ORDERED Plaintiff is awarded \$550.00 for time and costs associated with Defendant Kendrick L. Wilson's failure to appear.

Annie O'Connell
JUDGE, JEFFERSON CIRCUIT COURT
ENTERED: 10/10/2022

Tendered by:

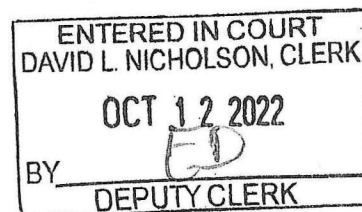
/s/ David B. Mour

DAVID B. MOUR, ESQ.

513 S. Second Street

Louisville, KY 40202

Phone: (502) 473-6464



TD : 000001 of 000001

No. 21-CI-000826

JEFFERSON CIRCUIT COURT

DIVISION ONE

JUDGE ANNIE O'CONNELL

DAVID B. MOUR

PLAINTIFF

v.

NOTICE - RENEWED MOTION-ORDER
COMPELLING APPEARANCE

KENDRICK L. WILSON

DEFENDANT

TO: Kendrick L. Wilson
415 Red Crest Drive
Shepherdsville, KY 40165
wilsonkendrick1216@gmail.com
Kenndrick.wilson16@yahoo.com

* * * *

Take notice that on Monday, October 10, 2022 at 9:15 a.m. ET, or as soon as may be heard, Plaintiff, David B. Mour, will make the motion and tender the following order in the above courtroom.

CERTIFICATE

I certify a copy hereof was served via U.S. Postal Service and/or electronic service on September 30, 2022.

RENEWED MOTION

Comes Plaintiff David B. Mour, ("**Mour**") and moves the Court to enter the following Order compelling the appearance of Kendrick L. Wilson at the date and time set forth in the

COM : 000001 of 000002

Second Notice to Take Deposition filed herein.

Plaintiff further moves the Court to enter the following Order awarding attorney fees of no less than \$550.00 based on Defendant Kendrick L. Wilson ("*Wilson*") failure to appear for depositions as noticed and served on July 8, 2021. Defendant was served by electronic means and via U. S. Postal Service regular mail, postage prepaid. On July 19, 2021 at 10:00 a.m., Plaintiff appeared and waited for Defendant Wilson to attend the deposition. On July 19, 2021 at 10:30 a.m., Plaintiff instructed the videographer that she was released and the deposition was terminated due to the failure of Deponent to appear (a copy of the original notice was previously filed with the Court).

Accordingly, the Court is urged to enter the following Order.

Respectfully Submitted,

/s/ David B. Mour

DAVID B. MOUR, ESQ.

513 S. Second Street

Louisville, KY 40202

Phone: (502) 473-6464

Fax: (502) 473-6462

dmour@louisvillefirm.com

Counsel for Plaintiff

7702
Hed
10-27

10/2

No. 21-CI-000826

JEFFERSON CIRCUIT COURT

DIVISION ONE (2)

JUDGE ANNIE O'CONNELL

DAVID B. MOUR

PLAINTIFF

v.

VERIFIED RESPONSE TO CR77.02 NOTICE

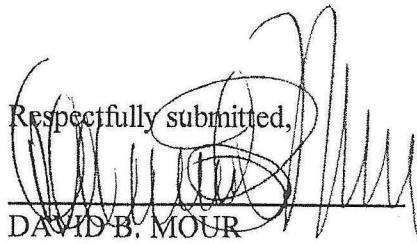
KENDRICK L. WILSON

DEFENDANT

* * * *

Comes Plaintiff, by counsel, and verification, and in response to the Court's CR 77.02 Notice, advises on July 29, 2021 he filed a Motion to Compel Defendant to appear for a deposition for which Mr. Wilson had been noticed on two different occasions and failed to appear on either of said dates. Said Motion was heard on August 2, 2021, the Court took same under submission and the Parties are still awaiting a ruling. Accordingly, it is Plaintiff's intention to proceed with this matter and any delay is not chargeable to Plaintiff and the case should remain active.

Respectfully submitted,


DAVID B. MOUR

513 S. Second Street

Louisville, KY 40202

dmour@louisvillefirm.com*Counsel for Plaintiff*

RES: 000001 of 000002

COMMONWEALTH OF KENTUCKY

COUNTY OF JEFFERSON

Subscribed and acknowledged the foregoing on this the 30th day of September 2022 by
DAVID B. MOUR, ESQ.

My Commission Expires



Rebecca L. Brown

NOTARY, State at Large, KY

CERTIFICATE

I certify a copy hereof was electronically served on the following person on September 30,
2022.

Kendrick Wilson
415 Red Crest Dr.
Shepherdsville, KY 40165
wilsonkendrick1216@gmail.com
Kendrick.wilson16@yahoo.com

/s/ David B. Mour

DAVID B. MOUR, Esq.

No. 21-CI-000826

JEFFERSON CIRCUIT COURT

DIVISION ONE

JUDGE ANNIE O'CONNELL

DAVID B. MOUR

PLAINTIFF

v.

NOTICE - RENEWED MOTION-ORDER
COMPELLING APPEARANCE

KENDRICK L. WILSON

DEFENDANT

TO: Kendrick L. Wilson
415 Red Crest Drive
Shepherdsville, KY 40165
wilsonkendrick1216@gmail.com
Kenndrick.wilson16@yahoo.com

* * * *

Take notice that on Monday, October 10, 2022 at 9:15 a.m. ET, or as soon as may be heard, Plaintiff, David B. Mour, will make the motion and tender the following order in the above courtroom.

CERTIFICATE

I certify a copy hereof was served via U.S. Postal Service and/or electronic service on September 30, 2022.

RENEWED MOTION

Comes Plaintiff David B. Mour, ("*Mour*") and moves the Court to enter the following Order compelling the appearance of Kendrick L. Wilson at the date and time set forth in the

COM : 000001 of 000002

Second Notice to Take Deposition filed herein.

Plaintiff further moves the Court to enter the following Order awarding attorney fees of no less than \$550.00 based on Defendant Kendrick L. Wilson ("*Wilson*") failure to appear for depositions as noticed and served on July 8, 2021. Defendant was served by electronic means and via U. S. Postal Service regular mail, postage prepaid. On July 19, 2021 at 10:00 a.m., Plaintiff appeared and waited for Defendant Wilson to attend the deposition. On July 19, 2021 at 10:30 a.m., Plaintiff instructed the videographer that she was released and the deposition was terminated due to the failure of Deponent to appear (a copy of the original notice was previously filed with the Court).

Accordingly, the Court is urged to enter the following Order.

Respectfully Submitted,

/s/ David B. Mour

DAVID B. MOUR, ESQ.

513 S. Second Street

Louisville, KY 40202

Phone: (502) 473-6464

Fax: (502) 473-6462

dmour@louisvillefirm.com

Counsel for Plaintiff

No. 21-CI-000826

**JEFFERSON CIRCUIT COURT
DIVISION ONE
JUDGE ANNIE O'CONNELL****DAVID B. MOUR****PLAINTIFF**

v.

ORDER**KENDRICK L. WILSON****DEFENDANT**

* * * *

Upon Motion of the Plaintiff, David B. Mour, and the Court being otherwise sufficiently advised;

IT IS HEREBY ORDERED that Defendant, Kendrick L. Wilson, shall appear on August 12, 2021 at 10:30 a.m. at the Office of David B. Mour, 513 S. Second Street, Louisville, KY 40202 for the Plaintiff to take Defendant, Kendrick L. Wilson's deposition. IT IS FURTHER ORDERED Plaintiff is awarded \$550.00 for time and costs associated with Defendant Kendrick L. Wilson's failure to appear.

JUDGE, JEFFERSON CIRCUIT COURT

ENTERED: _____

Tendered by:

/s/ David B. Mour

DAVID B. MOUR, ESQ.

513 S. Second Street

Louisville, KY 40202

Phone: (502) 473-6464

TD : 000001 of 000001

Commonwealth of Kentucky

AOC - S - 050 (NDLP)

Court of Justice



**Notice to Dismiss for
Lack of Prosecution**

Case: 21-CI-000826

Court: CIRCUIT

County: JEFFERSON

Pursuant to CR 77.02(2), notice is hereby given to the parties listed below that no pretrial step has been taken in this action within the last year and the case will be dismissed in 30 days for want of prosecution unless there is filed in the record prior thereto a pleading, with affidavit, showing good cause why no steps have been taken of record for more than one year. The court will enter an order dismissing without prejudice each case in which no answer or an insufficient answer to this notice is made.

MOUR, DAVID B. VS. WILSON, KENDRICK L

MOUR, DAVID B.

PLAINTIFF / PETITIONER

MOUR, DAVID BRADLEY
LAW OFFICE OF DAVID B. MOUR
513 S. SECOND STREET
LOUISVILLE KY 40202

ATTORNEY FOR PLAINTIFF

WILSON, KENDRICK L
415 RED CREST DRIVE
SHEPHERDSVILLE KY 40165

DEFENDANT / RESPONDENT

Circuit/District Clerk, DAVID NICHOLSON

Date: 09-27, 2022By ED, DC

I hereby certify that I have served a true copy of this notice on all parties listed herein by mailing a copy to their attorneys of record, postage prepaid.

FILED

Date: 09-27-22
Circuit/District Clerk,
DAVID NICHOLSON

By ED, DC

No. 21-CI-000826

JEFFERSON CIRCUIT COURT

DIVISION ONE 2

JUDGE ANNIE O'CONNELL

DAVID B. MOUR

PLAINTIFF

v.

NOTICE - MOTION-ORDER
COMPELLING APPEARANCE

KENDRICK L. WILSON

DEFENDANT

TO: Kendrick L. Wilson
415 Red Crest Drive
Shepherdsville, KY 40165
wilsonkendrick1216@gmail.com
Kenndrick.wilson16@yahoo.com

* * * *

Take notice that on Monday, August 2, 2021 at 9:15 a.m. ET, or as soon as may be heard, Plaintiff, David B. Mour, will make the motion and tender the following order in the above courtroom.

CERTIFICATE

I certify a copy hereof was served via U.S. Postal Service and/or electronic service on July 23, 2021.

MOTION

Comes Plaintiff David B. Mour, ("**Mour**") and moves the Court to enter the following Order compelling the appearance of Kendrick L. Wilson at the date and time set forth in the

CCM : 000001 of 000002

Second Notice to Take Deposition filed herein.

Plaintiff further moves the Court to enter the following Order awarding attorney fees of no less than \$550.00 based on Defendant Kendrick L. Wilson ("*Wilson*") failure to appear for depositions as noticed and served on July 8, 2021. Defendant was served by electronic means and via U. S. Postal Service regular mail, postage prepaid. On July 19, 2021 at 10:00 a.m., Plaintiff appeared and waited for Defendant Wilson to attend the deposition. On July 19, 2021 at 10:30 a.m., Plaintiff instructed the videographer that she was released and the deposition was terminated due to the failure of Deponent to appear (a copy of the original notice was previously filed with the Court).

Accordingly, the Court is urged to enter the following Order.

Respectfully Submitted,

/s/ David B. Mour

DAVID B. MOUR, ESQ.

513 S. Second Street

Louisville, KY 40202

Phone: (502) 473-6464

Fax: (502) 473-6462

dmour@louisvillefirm.com

Counsel for Plaintiff

No. 21-CI-000826

JEFFERSON CIRCUIT COURT

DIVISION TWO

JUDGE ANNIE O'CONNELL

DAVID B. MOUR

PLAINTIFF

v.

SECOND NOTICE TO TAKE DEPOSITION

KENDRICK L. WILSON

DEFENDANT

* * * *

Take notice Plaintiff will take the deposition of the Defendant, Kendrick L. Wilson, at the office of undersigned counsel on August 12, 2021 at 10:30 a.m. ET, said deposition to be taken in accordance with and used for all purposes permitted by the Kentucky Rules of Civil Procedure, the testimony to be recorded via videographic means. In addition, as permitted by the Kentucky Rules of Civil Procedure, Deponent is required to produce at said deposition, the following documents:

Copies of all videos or live stream videos or any other recordings of any kind or nature, audio or video, made or produced since February 1, 2021, stored on any platform or media (including but not limited to Facebook, Instagram, et al.), wherein Plaintiff or any member of Plaintiff's family is mentioned directly by name or indirectly.

/s/ David B. Mour

DAVID B. MOUR, ESQ.

513 South Second St.

Louisville, Kentucky 40202

Phone: (502) 473.6464

Fax: (502) 473.6462

dmour@louisvillefirm.com

Counsel for Plaintiff

NTD : 000001 of 000002

CERTIFICATE OF SERVICE

I certify a copy hereof was transmitted to the following person via regular mail and electronic as indicated on July 29, 2021:

Kendrick Wilson
415 Red Crest Dr.
Shepherdsville, KY 40165
wilsonkendrick1216@gmail.com
Kendrick.wilson16@yahoo.com

/s/ David B. Mour
DAVID B. MOUR, ESQ.

No. 21-CI-000826

**JEFFERSON CIRCUIT COURT
DIVISION ONE
JUDGE ANNIE O'CONNELL****DAVID B. MOUR****PLAINTIFF**

v.

ORDER**KENDRICK L. WILSON****DEFENDANT**

* * * *

Upon Motion of the Plaintiff, David B. Mour, and the Court being otherwise sufficiently advised;

IT IS HEREBY ORDERED that Defendant, Kendrick L. Wilson, shall appear on August 12, 2021 at 10:30 a.m. at the Office of David B. Mour, 513 S. Second Street, Louisville, KY 40202 for the Plaintiff to take Defendant, Kendrick L. Wilson's deposition. IT IS FURTHER ORDERED, _____

JUDGE, JEFFERSON CIRCUIT COURT

ENTERED: _____

Tendered by:

/s/ David B. Mour _____

DAVID B. MOUR, ESQ.

513 S. Second Street

Louisville, KY 40202

Phone: (502) 473-6464

TD : 000001 of 000001

No. 21-CI-000826

JEFFERSON CIRCUIT COURT

DIVISION TWO

JUDGE ANNIE O'CONNELL

DAVID B. MOUR

PLAINTIFF

v.

NOTICE TO TAKE DEPOSITION

KENDRICK L. WILSON

DEFENDANT

* * * *

Take notice Plaintiff will take the deposition of the Defendant, Kendrick L. Wilson, at the office of undersigned counsel on July 19, 2021 at 10 a.m. ET, said deposition to be taken in accordance with and used for all purposes permitted by the Kentucky Rules of Civil Procedure, the testimony to be recorded via videographic means. In addition, as permitted by the Kentucky Rules of Civil Procedure, Deponent is required to produce at said deposition, the following documents:

Copies of all videos or live stream videos or any other recordings of any kind or nature, audio or video, made or produced since February 1, 2021, stored on any platform or media (including but not limited to Facebook, Instagram, et al.), wherein Plaintiff or any member of Plaintiff's family is mentioned directly by name or indirectly.

/s/ David B. Mour

DAVID B. MOUR, ESQ.

513 South Second St.

Louisville, Kentucky 40202

Phone: (502) 473.6464

Fax: (502) 473.6462

dmour@louisvillefirm.com

Counsel for Plaintiff

NTD : 000001 of 000002

CERTIFICATE OF SERVICE

I certify a copy hereof was transmitted to the following person via regular mail and electronic as indicated on July 8, 2021:

Kendrick Wilson
415 Red Crest Dr.
Shepherdsville, KY 40165
wilsonkendrick1216@gmail.com
Kendrick.wilson16@yahoo.com

/s/ David B. Mour
DAVID B. MOUR, ESQ.

No. 21-CI-000826

JEFFERSON CIRCUIT COURT

DIVISION TWO

JUDGE ANNIE O'CONNELL

DAVID B. MOUR

PLAINTIFF

v.

NOTICE TO TAKE DEPOSITION

KENDRICK L. WILSON

DEFENDANT

* * * *

Take notice Plaintiff will take the deposition of the Defendant, Kendrick L. Wilson, at the office of undersigned counsel on July 19, 2021 at 10 a.m. ET, said deposition to be taken in accordance with and used for all purposes permitted by the Kentucky Rules of Civil Procedure, the testimony to be recorded via videographic means. In addition, as permitted by the Kentucky Rules of Civil Procedure, Deponent is required to produce at said deposition, the following documents:

Copies of all videos or live stream videos or any other recordings of any kind or nature, audio or video, made or produced since February 1, 2021, stored on any platform or media (including but not limited to Facebook, Instagram, et al.), wherein Plaintiff or any member of Plaintiff's family is mentioned directly by name or indirectly.

/s/ David B. Mour
 DAVID B. MOUR, ESQ.
 513 South Second St.
 Louisville, Kentucky 40202
 Phone: (502) 473.6464
 Fax: (502) 473.6462
 dmour@louisvillefirm.com
 Counsel for Plaintiff

CERTIFICATE OF SERVICE

I certify a copy hereof was transmitted to the following person via regular mail and electronic as indicated on July 8, 2021:

Kendrick Wilson
415 Red Crest Dr.
Shepherdsville, KY 40165
wilsonkendrick1216@gmail.com
Kendrick.wilson16@yahoo.com

/s/ David B. Mour
DAVID B. MOUR, ESQ.

NO. 21-CI-000826

JEFFERSON CIRCUIT COURT
DIVISION TWO (2)
ANNIE O'CONNELL, JUDGE

DAVID B. MOUR

PLAINTIFF

V

ORDER

KENDRICK L. WILSON

DEFENDANT

*** **

Upon Plaintiff's Motion for a Default Judgment, this matter is scheduled for a hearing, including the issue of damages on *July 7, 2021 at 1:30 p.m.* The Court has allotted *thirty (30) minutes.*

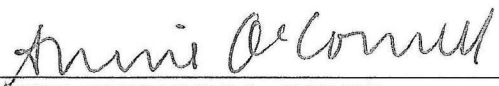
This hearing will be conducted via the ZOOM app. The video link can be accessed at:

www.jeffersoncircuitcourt.com/judge-annie-o-connell

-OR-

<https://zoom.us/j/9856811866>

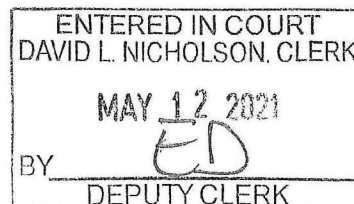
To join by telephone (US Toll Free), dial:
1-888-822-7517; Conference code: 471501


ANNIE O'CONNELL, JUDGE
JEFFERSON CIRCUIT COURT
DIVISION TWO (2)

DATE: 05/17/2021

cc: *Hon. David B. Mour*
513 South 2nd street
Louisville, Kentucky 40202
Plaintiff

Kendrick L. Wilson
415 Red Crest Drive
Shepherdsville, Kentucky 40165
Defendant



No. 21-CI-000826

JEFFERSON CIRCUIT COURT

DIVISION ONE 2

JUDGE ANNIE O'CONNELL

DAVID B. MOUR

PLAINTIFF

v.

MOTION FOR DEFAULT JUDGMENT

KENDRICK L. WILSON

DEFENDANT

* * * *

Comes the Plaintiff, David B. Mour, and moves the Court to enter the following Default Judgment against the Defendant, Kendrick L. Wilson, on the issue of liability and enter a permanent injunction barring Defendant from mentioning Plaintiff's name on social media or furnishing information on social media about Plaintiff via which he could be identified; and set the matter for a hearing on damages, compensatory and punitive, as per CR 55.01 since Plaintiffs' damages are unliquidated. In support, Plaintiff advises the Court Defendant was properly served with summons and a copy of the Complaint on February 17, 2021 and said Defendant has failed to plead or otherwise defend and is in default.

Plaintiff further certifies he has not received an Answer or responsive pleading from Defendant or anyone acting on his behalf. Wherefore, the Court is urged to enter the following Order.

/s/ David B. Mour

DAVID B. MOUR, ESQ.

513 South Second St.

Louisville, Kentucky 40202

Phone: (502) 473.6464

Fax: (502) 473.6462

dmour@louisvillefirm.com

Counsel for Plaintiff

No. 21-CI-000826

JEFFERSON CIRCUIT COURT

DIVISION ONE

JUDGE ANNIE O'CONNELL

DAVID B. MOUR

PLAINTIFF

v.

**DEFAULT JUDGMENT AND PERMANENT
INJUNCTION**

KENDRICK L. WILSON

DEFENDANT

* * * *

On motion of Plaintiff, the Court having found Defendant in default having been properly served with summons and a copy of the Complaint on February 17, 2021, and having failed to plead or otherwise defend, the Court further finding that Plaintiff's damages on his defamation claim, compensatory and punitive, are unliquidated, and thus a hearing will be required, and the Court being otherwise sufficiently advised, IT IS ORDERED as follows:

1. Plaintiff is granted JUDGMENT against Defendant, Kendrick L. Wilson on the issue of liability on Plaintiff's defamation and false-light claims as set forth in Plaintiff's Complaint;
2. This matter is set for a hearing on the _____ day of _____, 2021 at _____ m. for the Court to assess damages;
3. Defendant, Kendrick L. Wilson is hereby permanently restrained and enjoined from:
 - a. Mentioning Plaintiff's name on any social media platform, or otherwise publishing Plaintiff's name via any writing, medium or forum;

- b. Providing any information or materials on any social media platform, or otherwise publishing information via any writing, medium or forum via which even if Plaintiff's name is not used, he can be identified.

This is a final and appealable Order as to the relief granted via paragraph 3.

JUDGE, JEFFERSON CIRCUIT COURT

ENTERED: _____

Tendered by:

/s/ David B. Mour

DAVID B. MOUR, ESQ.

513 South Second St.

Louisville, Kentucky 40202

Phone: (502) 473.6464

Fax: (502) 473.6462

dmour@louisvillefirm.com

Counsel for Plaintiffs

No. 21-CI-000826

JEFFERSON CIRCUIT COURT

DIVISION ONE

JUDGE ANNIE O'CONNELL

DAVID B. MOUR

PLAINTIFF

v.

MOTION FOR DEFAULT JUDGMENT

KENDRICK L. WILSON

DEFENDANT

* * * *

Comes the Plaintiff, and pursuant to JRP 304(E), and in support of his Motion for Default Judgment, hereby certify that:

1. No papers in response to the Complaint have been served upon Plaintiff by Defendant or by anyone on his behalf.
2. Defendants was served with a summons and copy of the Complaint on February 17, 2021.
3. Plaintiff is entitled to entry of a permanent injunction against Defendant based on Defendant's failure to plead, however, the damages on Plaintiff's false-light and defamation claim are unliquidated and accordingly, a hearing on damages as per CR 55.01 is required.
4. To the best of Plaintiff knowledge and belief, Defendant is not now nor has he been during the pendency of this action, an active member of the military of the United States or its allies.

DAVID B. MOUR, Esq.

Subscribed and sworn to before me by David B. Mour on March 11, 2021.

My Commission Expires: _____

NOTARY PUBLIC, State-at-Large

No. 21-CI-000826

JEFFERSON CIRCUIT COURT

DIVISION ONE

JUDGE ANNIE O'CONNELL

DAVID B. MOUR

PLAINTIFF

v.

MOTION FOR DEFAULT JUDGMENT

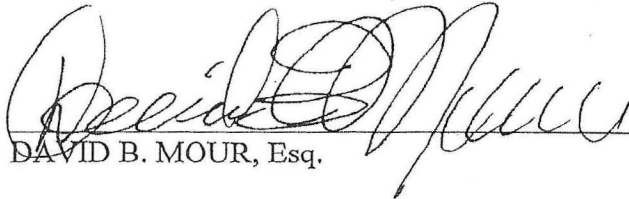
KENDRICK L. WILSON

DEFENDANT

* * * *

Comes the Plaintiff, and pursuant to JRP 304(E), and in support of his Motion for Default Judgment, hereby certify that:

1. No papers in response to the Complaint have been served upon Plaintiff by Defendant or by anyone on his behalf.
2. Defendants was served with a summons and copy of the Complaint on February 17, 2021.
3. Plaintiff is entitled to entry of a permanent injunction against Defendant based on Defendant's failure to plead, however, the damages on Plaintiff's false-light and defamation claim are unliquidated and accordingly, a hearing on damages as per CR 55.01 is required.
4. To the best of Plaintiff knowledge and belief, Defendant is not now nor has he been during the pendency of this action, an active member of the military of the United States or its allies.


DAVID B. MOUR, Esq.

Subscribed and sworn to before me by David B. Mour on March 11, 2021.

My Commission Expires: 1-11-2023


NOTARY PUBLIC, State-at-Large

No. 21-CI-000826

JEFFERSON CIRCUIT COURT

DIVISION ONE

JUDGE ANNIE O'CONNELL

DAVID B. MOUR

PLAINTIFF

v.

**DEFAULT JUDGMENT AND PERMANENT
INJUNCTION**

KENDRICK L. WILSON

DEFENDANT

* * * *

On motion of Plaintiff, the Court having found Defendant in default having been properly served with summons and a copy of the Complaint on February 17, 2021, and having failed to plead or otherwise defend, the Court further finding that Plaintiff's damages on his defamation claim, compensatory and punitive, are unliquidated, and thus a hearing will be required, and the Court being otherwise sufficiently advised, IT IS ORDERED as follows:

1. Plaintiff is granted JUDGMENT against Defendant, Kendrick L. Wilson on the issue of liability on Plaintiff's defamation and false-light claims as set forth in Plaintiff's Complaint;
2. This matter is set for a hearing on the ____ day of _____, 2021 at _____ m. for the Court to assess damages;
3. Defendant, Kendrick L. Wilson is hereby permanently restrained and enjoined from:
 - a. Mentioning Plaintiff's name on any social media platform, or otherwise publishing Plaintiff's name via any writing, medium or forum;

- b. Providing any information or materials on any social media platform, or otherwise publishing information via any writing, medium or forum via which even if Plaintiff's name is not used, he can be identified.

This is a final and appealable Order as to the relief granted via paragraph 3.

JUDGE, JEFFERSON CIRCUIT COURT

ENTERED: _____

Tendered by:

/s/ David B. Mour

DAVID B. MOUR, ESQ.

513 South Second St.

Louisville, Kentucky 40202

Phone: (502) 473.6464

Fax: (502) 473.6462

dmour@louisvillefirm.com

Counsel for Plaintiffs

AOC-E-105 Sum Code: CI
Rev. 9-14

Commonwealth of Kentucky
Court of Justice Courts.ky.gov

CR 4.02; Cr Official Form 1



CIVIL SUMMONS

Case #: 21-CI-000826

Court: CIRCUIT

County: JEFFERSON Circuit

Plaintiff, MOUR, DAVID B. VS. WILSON, KENDRICK L, Defendant

TO: KENDRICK L WILSON
415 RED CREST DRIVE
SHEPHERDSVILLE, KY 40165

The Commonwealth of Kentucky to Defendant:

You are hereby notified that a **legal action has been filed against you** in this Court demanding relief as shown on the document delivered to you with this Summons. **Unless a written defense is made by you or by an attorney on your behalf within twenty (20) days** following the day this paper is delivered to you, judgment by default may be taken against you for the relief demanded in the attached complaint.

The name(s) and address(es) of the party or parties demanding relief against you or his/her (their) attorney(s) are shown on the document delivered to you with this Summons.

David L. Nicholson

Jefferson Circuit Clerk

Date: 2/5/2021

Proof of Service

This Summons was:

☒ Served by delivering a true copy and the Complaint (or other initiating document)

To: Kendrick Wilson

☐ Not Served because: _____

Date: 2-17, 2021

Larry Tunnell
Served By

Processor 1166
Title

Summons ID: @00000966842, BULLITT COUNTY SHERIFF
CIRCUIT: 21-CI-000826 Sheriff Service
MOUR, DAVID B. VS. WILSON, KENDRICK L

eFiled

No.

JEFFERSON CIRCUIT COURT

DIVISION _____

DAVID B. MOUR

PLAINTIFF

v.

**COMPLAINT FOR MONEY DAMAGES AND
INJUNCTIVE RELIEF, TEMPORARY AND PERMANENT**

KENDRICK L. WILSON
415 Red Crest Drive
Shepherdsville, KY 40165

DEFENDANT

*** **

JURY FEE PAID

Comes the Plaintiff, David B. Mour, and for his Complaint against the Defendant,

Kendrick L. Wilson, states as follows:

1. Plaintiff, David B. Mour is a resident of Kentucky residing in Jefferson County and is an attorney licensed to practice in the Commonwealth of Kentucky in good standing, and he has been in and continued in good standing since his admission to the practice of law in Kentucky in April of 1986.

2. Plaintiff has been actively involved in the civil rights movement in Louisville, Kentucky, since its resurgence in late May of 2020, said involvement including, but not necessarily being limited to representing numerous protestors falsely arrested by local law enforcement, as well as providing legal advice and representation to one or more civil rights groups.

3. Defendant, Kendrick L. Wilson ("*Wilson*"), is a resident of Kentucky.

4. The damages complained of herein exceed the minimum amount necessary to establish the jurisdiction of this Court and in addition, Plaintiff seeks injunctive relief, temporary and permanent.

5. On numerous occasions on and after January 31, 2021, Wilson has uttered, published transmitted and broadcast through social media platforms, and otherwise, including but not limited to Facebook's "Livestream" feature, false and defamatory statements regarding Plaintiff, which false and defamatory statements were spoken and written and were received and observed by numerous persons residing in Jefferson County.

6. The false and defamatory statements uttered by Wilson regarding Plaintiff constitute slander and/or libel *per se* and include, but are not necessarily limited to the following:

- a. Statements that, or to the effect that, Plaintiff is a criminal or has engaged in criminal activity;
- b. Statements that, or to the effect that, Plaintiff is a thief;
- c. Statements suggesting or claiming that Plaintiff is engaged in human trafficking and specifically, that he is involved in the sale and/or trafficking of children;
- d. Statements to the effect that Plaintiff owes and/or was forced to pay millions of dollars to third parties due to judgments having been entered against him;
- e. Statements suggesting or claiming that Plaintiff is dishonest generally, and in connection with events that have occurred in the civil rights movement in Louisville, even going so far as to claim that Plaintiff's minor daughter, who is also involved in the civil rights movement has lied about certain events;

- f. Statements claiming that Plaintiff had an ownership interest in a trucking company which was engaged in human trafficking and/or other unlawful activity;
- g. Statements claiming Plaintiff was involved in or with one or more other companies, individuals or real properties engaged or involved in human trafficking and/or other unlawful activity;

7. On information and belief, even prior to January 31, 2021, Wilson had published statements or information regarding Plaintiff of the type set forth in the prior paragraph which which were false and defamatory, and/or portrayed Plaintiff in a false light.

8. Wilson knew or should have known the false and defamatory statements he published regarding Plaintiff were in fact false, untrue, misleading and/or inaccurate and his utterance and publication of said statements was undertaken intentionally, wilfully and with actual malice by Wilson with the express purpose and goal of damaging Plaintiff's reputation, which statements have in fact damaged Plaintiff's reputation, both personally and professionally.

9. In addition to the above, Wilson has published and disseminated information and statements repeatedly designed to portray Plaintiff in a false light, both before, on and after January 31, 2021.

10. Wilson's conduct in defaming Plaintiff and portraying him in a false light is part and parcel of a pattern and practice engaged in by Wilson, with the assistance of other unknown individuals, wherein he targets, harasses, bullies, intimidates, threatens and defames various other individuals involved in the civil rights movement, including but not limited to Plaintiff. Indeed, Plaintiff has learned that on February 4, 2021, another individual who was targeted by Wilson obtained a civil restraining order against him in the Jefferson District Court requiring

Wilson to cease and desist such conduct regarding said individual, which restraining order, on information and belief, Wilson has already violated.

11. On or about January 31, 2021, Plaintiff transmitted a written communication to Wilson demanding he immediately cease and desist publishing any further false and/or defamatory statements or information regarding Plaintiff and that he cease portraying Plaintiff in a false light.

12. Wilson's response to Plaintiff's directive to cease and desist as above described was to advise Plaintiff "F*** you eat a d**k". In addition Wilson immediately turned to social media to resume his false and defamatory attacks on Plaintiff as well as others

13. In addition, on information and belief, after initially receiving Plaintiff's directive to cease and desist, Wilson deleted some of his videos from social media in an apparent effort to conceal and/or eliminate proof of his defamatory and actionable conduct.

COUNT I-DEFAMATION/PORTRAYAL IN FALSE LIGHT

14. All prior paragraphs are herein restated and reiterated.

15. The aforementioned conduct of Wilson constitutes actionable portrayal of Plaintiff in a false light and defamation of character, specifically, in the form of both slander and libel *per se*, entitling Plaintiff to an award of damages against Wilson, presumed and actual.

16. Regarding Plaintiff's presumed damages, based on *per se* defamation, said award against Wilson should be not less than one millions dollars (\$1,000,000.00)

17. In addition, Wilson's aforementioned conduct was undertaken with actual malice and was intentionally designed to injure and harm Plaintiff, and based thereon, Plaintiff is also entitled to an award of punitive damages.

COUNT II- INJUNCTIVE RELIEF TEMPORARY AND PERMANENT

18. All prior paragraphs are herein restated and reiterated.

19. The aforementioned conduct on the part of Wilson has caused, and if allowed to continue, is causing and will continue to cause Plaintiff irreparable harm in the form of continued and further damage to his personal and professional reputation, which damage cannot be measured or compensated via money damages.

20. Accordingly, Plaintiff is entitled to injunctive relief in the form of entry of an Order banning or restricting Wilson from using or employing social media for any purpose, or in the alternative, banning Wilson from mentioning or discussing Plaintiff on social media or in any other forum or medium, either directly or indirectly.

WHEREFORE, Plaintiff demands relief as follows:

A. Entry of a money judgment against Wilson to compensate Plaintiff for his damages, presumed in an amount not less than One Million Dollars (\$1,000,000.00), and actual, along with an award of punitive damages, in an amount deemed fair and just by the trier of fact, with interest thereon at the maximum legal rate for the maximum duration allowed by law.

B. Entry of a temporary and permanent injunction as above set forth to prevent Wilson from further defaming Plaintiff and/or portraying him in a false light.

C. Trial by jury on all issues so triable.

D. His costs herein incurred including attorney fees.

E. Any and all other relief to which he may be entitled.

Respectfully submitted,

/s/ David B. Mour
DAVID B. MOUR, ESQ
513 S. Second Street
Louisville, Kentucky 40202
(502) 473-6464
dmour@louisvillefirm.com



CIVIL SUMMONS

Case #: **21-CI-000826**

Court: **CIRCUIT**

County: **JEFFERSON Circuit**

Plaintiff, **MOUR, DAVID B. VS. WILSON, KENDRICK L.**, Defendant

TO: **KENDRICK L WILSON**
415 RED CREST DRIVE
SHEPHERDSVILLE, KY 40165

The Commonwealth of Kentucky to Defendant:

You are hereby notified that a **legal action has been filed against you** in this Court demanding relief as shown on the document delivered to you with this Summons. **Unless a written defense is made by you or by an attorney on your behalf within twenty (20) days** following the day this paper is delivered to you, judgment by default may be taken against you for the relief demanded in the attached complaint.

The name(s) and address(es) of the party or parties demanding relief against you or his/her (their) attorney(s) are shown on the document delivered to you with this Summons.

David L. Nicholson

Jefferson Circuit Clerk

Date: **2/5/2021**

Proof of Service

This Summons was:

☐ Served by delivering a true copy and the Complaint (or other initiating document)

To: _____

☐ Not Served because: _____

Date: _____, 20____

Served By

Title



JEFFERSON County
Random Judge Assignment Report

Court: Circuit Court

Requestor: DARRELL_GONTERMAN **Reference/Case Number:** 21-CI-000826

This Case has been Assigned to: 2 **Division**

Hon Annie O'Connell 630384

Control Date/Time: 02/08/2021 7:02:11AM

Commonwealth of Kentucky
Jefferson County
David Nicholson
Circuit Court Clerk

Receipt Number: 71-0119146-A

DATE: 02/08/2021

TIME: 07:03 AM

*** (Z) OTHER TYPE RECEIPT ***

CASE NO: 21-CI-000826

RECEIVED FROM: DAVID BRADLEY MOUR

ACCOUNT OF: MOUR, DAVID B. VS. WILSON, KENI

PARTY NAME: DAVID BRADLEY MOUR

1. ATJ Fee (1)	20.00
2. Civil Filing Fee (Q)	150.00
3. Court Technology MCFO(K(CT))	20.00
4. Library Fee (L)	3.00
5. Attorney Tax Fee MCFO(K(Q))	5.00
6. Jury Demand/12 CS(W(M))	70.00
7. Bullitt Electronic Service Copies MCFO(K(SC15))	0.70
8. Bullitt Electronic Service MCFO(K(ES15))	60.00

TOTAL: \$328.70

CREDIT CARD: \$328.70

***DIFF: 0.00

Envelope #: 3163907

Prepared By: Web_Payment

** MCFO=Money Collected for Others

** CS=Charge for Services

Payer

Page 1 of 2

Commonwealth of Kentucky
Jefferson County
David Nicholson
Circuit Court Clerk

Receipt Number: 71-0119146-A

DATE: 02/08/2021

TIME: 07:03 AM

*** (Z) OTHER TYPE RECEIPT ***

CASE NO: 21-CI-000826

RECEIVED FROM: DAVID BRADLEY MOUR

ACCOUNT OF: MOUR, DAVID B. VS. WILSON, KENI

PARTY NAME: DAVID BRADLEY MOUR

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6. Jury Demand/12 CS(W(M))	70.00
7. Bullitt Electronic Service Copies MCFO(K(SC15))	0.70
8. Bullitt Electronic Service MCFO(K(ES15))	60.00

TOTAL: \$328.70

CREDIT CARD: \$328.70

***DIFF: 0.00

Envelope #: 3163907

Prepared By: Web_Payment

** MCFO=Money Collected for Others

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Filing (KYCOURTS)

Page 1 of 2

MO-HSCC TO HSCC <XDC-HZM> MO-HSCC TO HSCC <XDC-HZM>