

IN THE SUPERIOR COURT OF HALL COUNTY  
STATE OF GEORGIA

FILED  
HALL COUNTY, GA  
2008 JUL 25 AM 10:06

DWIGHT S. WOOD, CLERK  
SUPERIOR STATE COURT

CIVIL ACTION

FILE NO.: \_\_\_\_\_

WENDY LOUISE WEBB, )

Plaintiff, )

Vs. )

BRADLEY COLLINS, )

Defendant. )

COMPLAINT FOR BREACH OF PROMISE TO MARRY

WENDY LOUISE WEBB, Plaintiff, files her Complaint against BRADLEY COLLINS as Defendant, and shows this Court the Following:

1.

Defendant is a resident of Hall County, Georgia, is subject to the jurisdiction and venue of this Court, and may be served at 4558 Gillsville Hwy, Gillsville, Georgia, 30543.

2.

The Plaintiff and her two (2) children lived happily in her home for seven years at 5031 Florence Street, Oakwood, Georgia 30566.

3.

Plaintiff and Defendant began dating in January of 2006.

4.

The Defendant owned a home located at 4558 Gillsville Hwy, Gillsville, Georgia 30543.

5.

Both the Plaintiff and the Defendant in preparation to live together put their respective homes up for sale in April or May of 2006.

6.

The Plaintiff's home sold in August of 2006, and Plaintiff received from the sale of her home the sum of \$ 13,487.09.

WILLIAM L. SYKES, JR.  
Attorney at Law  
106 Washington Street, SE  
Gainesville, GA 30501  
Ph. (770) 532-4019  
Fax (770) 532-4553  
Email: wlsjr@bellsouth.net

GA STATE BAR #895650

7.

The Defendant's home did not sell and the Defendant took his home off the market.

8.

The parties then began living together as a couple in the Defendant's home with an understanding that they would be married.

9.

On Christmas Day, December 25, 2006, the defendant gave the Plaintiff a ring, got on his knees and asked the Plaintiff to marry him.

10.

The Plaintiff accepted Defendant's proposal on December 25, 2006.

11.

On December 25, 2007, the Defendant gave to Plaintiff a beautifully wrapped package as a Christmas present. Upon Plaintiff's opening of the present, it contained the plans for their wedding, which was to be August 30, 2008. (See Exhibit "A" hereto attached)

12.

Plaintiff agreed with Defendant's hand-written plan without objection.

13.

In January of 2008, the Defendant bought the Plaintiff's wedding dress on his credit card.

14.

On July 18, 2008, the Defendant, Bradley Collins, made application for a criminal arrest warrant alleging criminal trespass by the Plaintiff. (See Exhibit "B" hereto attached) and seeking to have Plaintiff and her children removed from the home.

15.

At all times since accepting Defendant's marriage proposal and up to July 18, 2008, Plaintiff relied on the contract and believed that Defendant would marry her.

16.

Plaintiff, in reliance on the agreement to marry defendant, at all times mentioned has given to Defendant all of her love, devotion, care, attention, money, and help in increasing the value of Defendant's property.

17.

Plaintiff has suffered grievous mental pain and anguish, wounded pride, mortification, humiliation, shame, and disgrace, and her health has been impaired, all to her damage in an amount to be determined at trial.

18.

Since being served with Defendant's application for criminal arrest warrant, Plaintiff has suffered, anguish, wounded pride, mortification, humiliation, shame, and disgrace, and her health has been impaired.

19.

Since being served with Defendant's application for criminal arrest warrant, Plaintiff's two (2) children and Plaintiff, have been scared, uncertain, and have suffered, anguish, wounded pride, mortification, humiliation, shame, and disgrace.

20.

While living together with the expectation of being married, the Plaintiff not only used the equity received from the sale of her home, which was \$13, 487.09, her income tax refunds, she used numerous additional dollars to add on to the home, to enclose the barn, to enclose the shed in concrete, to build a swimming pool, to build a fence around the pool, to tile the pool, to purchase a dish washer, to purchase the garage door opener, to pay property taxes, to purchase automobiles, to trade automobiles, to pay the property taxes, all amounts to be proven at the time of trial.

21.

The Plaintiff has been required to retain an attorney to defend herself and her children against Defendant's application for criminal arrest warrant for trespass, which will also be proven at the time of trial.

22.

The Defendant has acted in bad faith and has caused the Plaintiff unnecessary trouble and expense. Plaintiff and her children have no where to go and are without funds to move.

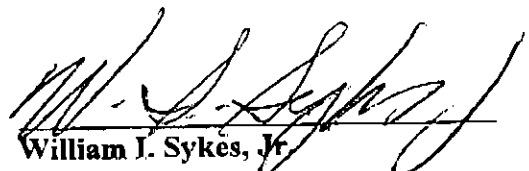
23.

Defendant's conduct evidences such oppression and lack of regard for the consequences of his actions as to warrant recovery of punitive damages.

WHEREFORE, Plaintiff prays:

- (a) That she have a jury trial;
- (b) That she have judgment against the defendant to satisfy the pecuniary loss she sustained due to Defendant breach of contract;
- (c) That she have judgment against the defendant for mental anguish, humiliation, and injury to her health and psyche due to Defendant's breach of contract;
- (d) That she recover her expenses of litigation including reasonable and necessary attorney fees;
- (e) That she recover punitive damages in an amount sufficient to punish Defendant's conduct; and
- (f) That she have such further relief as this court deems just and proper.

This 25<sup>th</sup> day of July, 2008.

  
William I. Sykes, Jr.  
Attorney at Law  
Georgia Bar No.: 695650