

IN THE SUPERIOR COURT OF CHATHAM COUNTY
STATE OF GEORGIA

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2018 DEC 31 PM 2:53

Andrew Byington

*Savannah Mall
Realty Holding, LLC
Petitioner,
D/B/A Savannah Mall*

Civil Action No.

SPCV18-01203FR
DEPT. SUPERIOR CT.
CHATHAM COUNTY, GA

Respondent.

*Tony Thomas and
Stuff Store*

ANSWER

AND COUNTERCLAIM

I, *Tony Thomas*, answer the Petition for *Stuff*
Store, Inc as follows:

1.

The allegations of paragraph one of the Petition are:

- admitted;
- denied;
- neither admitted nor denied because I do not have sufficient knowledge to admit or deny.

2.

The allegations of paragraph two of the Petition are:

- admitted;
- denied;
- neither admitted nor denied because I do not have sufficient knowledge to admit or deny.

3.

The allegations of paragraph three of the Petition are:

- admitted;
- denied;
- neither admitted nor denied because I do not have sufficient knowledge to admit or deny.

4.

ENTERED AB DEC 31 2018

The allegations of paragraph four of the Petition are:

- admitted;
- denied;
- neither admitted nor denied because I do not have sufficient knowledge to admit or deny.

5.

The allegations of paragraph five of the Petition are:

- admitted;
- denied;
- neither admitted nor denied because I do not have sufficient knowledge to admit or deny.

6.

The allegations of paragraph six of the Petition are:

- admitted;
- denied;
- neither admitted nor denied because I do not have sufficient knowledge to admit or deny.

7.

The allegations of paragraph seven of the Petition are:

- admitted;
- denied;
- neither admitted nor denied because I do not have sufficient knowledge to admit or deny.

8.

The allegations of paragraph eight of the Petition are:

- admitted;
- denied;
- neither admitted nor denied because I do not have sufficient knowledge to admit or deny.

9.

The allegations of paragraph nine of the Petition are:

- admitted;
- denied;
- neither admitted nor denied because I do not have sufficient knowledge to admit or deny.

10.

The allegations of paragraph ten of the Petition are:

- admitted;
- denied;
- neither admitted nor denied because I do not have sufficient knowledge to admit or deny.

11.

The allegations of paragraph eleven of the Petition are:

- admitted;
- denied;
- neither admitted nor denied because I do not have sufficient knowledge to admit or deny.

12.

The allegations of paragraph twelve of the Petition are:

- admitted;
- denied;
- neither admitted nor denied because I do not have sufficient knowledge to admit or deny.

13.

The allegations of paragraph thirteen of the Petition are:

- admitted;
- denied;
- neither admitted nor denied because I do not have sufficient knowledge to admit or deny.

14.

The allegations of paragraph fourteen of the Petition are:

- admitted;
- denied;
- neither admitted nor denied because I do not have sufficient knowledge to admit or deny.

15.

The allegations of paragraph fifteen of the Petition are:

- admitted;
- denied;
- neither admitted nor denied because I do not have sufficient knowledge to admit or deny.

16.

The allegations of paragraph sixteen of the Petition are:

- admitted;
- denied;
- neither admitted nor denied because I do not have sufficient knowledge to admit or deny.

17.

The allegations of paragraph seventeen of the Petition are:

- admitted;
- denied;
- neither admitted nor denied because I do not have sufficient knowledge to admit or deny.

18.

The allegations of paragraph eighteen of the Petition are:

- admitted;
- denied;
- neither admitted nor denied because I do not have sufficient knowledge to admit or deny.

#19 - Admitted

#20 - Denied

#21 - Admitted - Was not water leaks. Were
sewage back-up from Savannah Mall lack
of maintenance of lines.

#22 - Admitted -

#23 - Admitted

#24 - Denied

#25 - Denied

#26 - Admitted

#25(2) - Denied - Was not furnished
a signed lease.

#26(2) - Denied

#27 - Denied

#28 - Denied

#29 - Denied

#30 - neither admitted or denied because I do not have sufficient knowledge to admit or deny.

#31 - neither admitted or denied because I do not have sufficient knowledge to admit or deny.

#32 - Denied

#33 - Denied

#34 - Denied

#35 - Admitted

#36 - Denied

□ COUNTERCLAIM FOR _____

1.

The Court has jurisdiction over the subject matter and parties in this action for

All Rents for 2017 were paid to Savannah Mall
- There were no signed leases for 2018 for the units. - Terms do not correlate to claims in action

Kanne Marsh - acting as General Manager failed to provide signed copies for units. Rates for 2018 were to be renegotiated on #1116 #2506 at 1500.00 per month for #1116 & 500.00 for #2506

Savannah Mall Management & Ownership ignored ~~offerts~~ pleas to make critical repairs that damaged business and goodwill and created a often dangerous condition of ~~Structs~~ ^{Structs}

Savannah Mall failed to maintain infrastructure belonging to the mall that caused multiple cases of loss to staff store.

Savannah Mall did not honor their promises and commitments to foster a positive safe environment for merchants & customers resulting into major financial loss to merchants.

As a duly elected public official for Savannah, with a ~~Constitutional~~ Constitutional right of freedom of Speech, ~~and~~ ^{and} will not allow censorship of my ~~concerns or comments~~ ^{concerns or comments}

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concerns or comments for myself or those I represent when it comes to concerns of the community at large.

Savannah Mall has failed to provide an atmosphere of safety for its merchants and customers

Savannah Mall has an inconsistent policy toward the opening and closing hours of merchants throughout the mall.

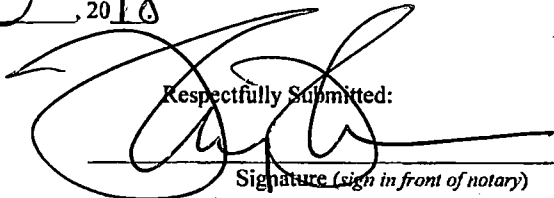
Shiff Store, Inc. has no leases signed or copies of executed leases governing 2018 in our possession or which have been furnished.

WHEREFORE, I request

- That the _____ be dismissed and that all relief requested be denied;
- That my Counterclaim for \$3 be granted;
- That I _____;
- That I be awarded _____;
- That I be awarded _____;
- That I be awarded _____;
- That I have any additional relief as this Court believes is fair and appropriate.

This 31st day of Dec, 2018

Respectfully Submitted:


Signature (sign in front of notary)

Name: Tony Thomas

Address: 13 Vernonburg Road

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