

1
2
3
4
5
6
7
8 **UNITED STATES DISTRICT COURT FOR**
9 **THE EASTERN DISTRICT OF MISSOURI**
10 **EASTERN DIVISION**

11 PAUL HENREID

12 Plaintiff,

13 v.

14 KODNER WATKINS LC;

15 ALBERT WATKINS;

16 MICHAEL SCHWADE;

17 And DOES 1-10,

18 Defendants.

) Case No.

)

) Plaintiff Requests Trial by Jury

)

) **CIVIL COMPLAINT:**

)

)

1) LEGAL MALPRACTICE

)

2) BREACH OF FIDUCIARY DUTY /
CONSTRUCTIVE FRAUD 3)

)

3) NEGLIGENCE

)

4) FRAUD

)

5) INTENTIONAL INFLICTION OF
EMOTIONAL DISTRESS

)

)

1 **I. JURISDICTION**

2 **Diversity of Citizenship**

3 Plaintiff is a citizen of the State of Oklahoma. Defendant Kodner Watkins LC is a
4 law firm incorporated under the laws of the State of Missouri, and has its principal place
5 of business in Saint Louis, Missouri. Defendants Albert Watkins and Michael Schwade
6 are individuals that are citizens of the State of Missouri that work for defendant Kodner
7 Watkins LC with their principal place of business in Saint Louis, Missouri. Contact
8 information for the named defendants and plaintiff are in the attachment. Upon
9 information and belief, each of the fictitiously named DOE Defendants is responsible in
10 some manner for the occurrences herein alleged and proximately caused plaintiff's
11 damages, and each was acting as agent for the others.

12 Plaintiff is ignorant of the true names or capacities of the defendants sued herein
13 under the fictitious names DOES 1-10, and will seek leave of court to amend this
14 complaint to allege such names and capacities as soon as they are ascertained.

15 **Amount in Controversy**

16 The amount in controversy exceeds \$75,000, not counting interest and costs of court,
17 for reasons described below. Plaintiff has suffered actual damages and continues to suffer
18 damages and will suffer lifelong irreversible damage as a direct result of Defendants'
19 actions.

1 she occupied prior to such arrests, pleas, trials, or convictions as if such events had never
2 taken place.” (Mo. Rev. Stat. § 610.140.)

3 The Missouri Department of Corrections web site states: “Q: Will a pardon expunge
4 my record? No. The criminal history record maintained by the Missouri State Highway
5 Patrol will be updated to include pardon information, but it will still be maintained as an
6 open record and will be available to the general public.”

7 Plaintiff discussed the inferiority of Clemency compared to Expungement with
8 Defendants several times. Despite this and instructing Defendants in writing to “fly below
9 their radar,” Defendants essentially created a fake news story connecting Plaintiff to then-
10 Missouri Governor Greitens and held de facto press conferences in some type of media
11 blitz on or around June 2018 that resulted in more nationwide, permanently bad internet
12 articles about Plaintiff more than ever before. These actions were done before securing an
13 Expungement.

14 What is particularly malicious is that Defendants were discussing charges that had
15 been dismissed, closed and confidential by various Missouri laws, with media sources that
16 had no relevance to their fake news about Clemency or an Expungement. They even made
17 statements of “fact” they have no clue about that make Plaintiff look guilty of those
18 dismissed and other charges. Plaintiff is still fighting court battles, having already spent
19 tens of thousands of dollars to clear his name that defendants tarnished over the internet.
20 This was a foreseeable result of defendants’ misconduct that tolls statutes of limitations.

21 Even with an expunged record that is clean with no convictions, the damage done
22 on the internet by the defendants takes no prisoners and will be lifelong. Plaintiff could

1 never effectively represent someone as an attorney with such prejudicial articles and
2 statements all over the internet that were created by the defendants. Defendants did the
3 opposite of what they were hired to do, and betrayed their own client after being paid
4 \$5,000 for a two-page form Petition that Plaintiff completed.

5 As a direct result of Defendants' backstabbing their own client, internet search
6 engines now state the exact opposite of the public record even before the expungement
7 because the internet search engines state that Plaintiff was convicted of dismissed charges
8 or charges that were never brought against Plaintiff. For example, a Google search result
9 stated: "[Plaintiff name] was convicted of invasion of privacy in St. Louis ... child
10 pornography, possession of child pornography and child abuse." Grammatically this is a
11 complete sentence that is the exact opposite of the truth. Yet, there is little one can do to
12 change these false and defamatory internet search results caused by Defendants' willful
13 and wanton disregard for their client because Section 230 of the Communications Decency
14 Act immunizes internet search engines like Google and Yahoo from civil liability.

15 Google's one-sentence summary twists and contradicts the original publications
16 that state those charges were dismissed. Therefore, Google's internet summary falsely
17 stated Plaintiff was convicted of crimes and sex offenses, which is the opposite of the truth
18 those charges were dismissed. Plaintiff was never charged with Child Abuse, let alone
19 convicted.

20 Defendants' preemptive argument that the matters they discussed were in the
21 public record is a farce because they are not in the public record after an expungement and
22 many of the statements made to the press were not in the public record, and they had no

1 way of knowing some of the matters they discussed because even Plaintiff does not know
2 about some of the incriminating statements defendants made to the press about their
3 client.

4 Likewise, Yahoo's internet search engine result falsely stated: "[Plaintiff's name]
5 was convicted of invasion of privacy in St. Louis for secretly filming sex partners ...
6 possession of child pornography and child." Defendants caused these permanent, lifelong
7 defamatory stains over the internet just months before Plaintiff's Expungement. The
8 dismissed charges had nothing to do with the fake news story they created. Mentioning
9 decades old dismissed charges that were closed and confidential was sadistic malice, to
10 their own client who paid them well.

11 Defendants' actions were malicious, oppressive, and fraudulent because they never
12 advised Plaintiff of their intent to issue press releases and create a media blitz referring to
13 Plaintiff as a "stripper" even though Plaintiff had not worked in said capacity for over two
14 decades. Defendants knew Plaintiff changed one letter in his surname in 2005 to protect
15 his privacy on the internet; yet, Defendants openly revealed Plaintiff's name change in
16 their 2018 media blitz, thereby destroying the privacy Plaintiff enjoyed for thirteen years
17 and defeating the whole purpose of Plaintiff's one letter name change.

18 In the original newspaper article orchestrated by Defendants and published by the
19 St. Louis Post-Dispatch was created without Plaintiff's knowledge or permission. Plaintiff
20 learned about this media blitz on or around June 2018. Defendants fabricated a fake news
21 story about a hypothetical Clemency that did not and could not have occurred. Worse,
22 Defendants regurgitated dismissed charges from over two decades before that were

1 completely irrelevant to Clemency. Now, as a result of Defendants' actions, an internet
2 search of Plaintiff's name reveals dozens of articles republished on the Associated Press
3 from the St. Louis Post-Dispatch, Houston Chronicle, Washington Post, U.S. News &
4 World Report, American Bar Association Journal, CBS News, Chicago Tribune, several
5 local and regional newspapers, and more. Defendants permanently stained their own
6 client's life forever after they were retained for an Expungement to help clean up their
7 client's record and ignored their client's instruction to "fly below their radar" just to gain
8 media publicity.

9 When Plaintiff confronted Defendants about the fake news they created that has
10 permanently damaged Plaintiff, Defendants tried to argue that everything was in the
11 public record. Defendants knew there would be blowback and had premeditated this
12 bogus defense. The irony and hypocrisy of this fallacious defense is that had they done
13 their job of getting an Expungement, this would not have been a true statement because
14 none of the information is accessible in the public record after Expungement. Worse,
15 Plaintiff provided Defendants with the public record, so they did not even need to dig it up
16 at the courthouse. Then these attorneys e-mail the public record Plaintiff gave them to
17 the news media that probably would not have spent the resources to verify it by digging it
18 up at the courthouse. This is the ultimate breach of attorney-client loyalty and
19 confidentiality. For the attorney to argue in his defense that it was in the public record is
20 pure premeditated malice. Even with the public record in hand that Plaintiff gave his
21 attorneys, they still got it wrong and told the press Plaintiff was charged with Child
22 Abuse, which was never true.

1 Defendants showed no regard for duties of loyalty and confidentiality to their client
2 because they smeared Plaintiff's name without his permission or knowledge all over the
3 internet months before Plaintiff was to receive an Expungement that would create a clean
4 criminal record. Defendants did all these malicious and oppressive acts to their own client
5 who paid them five thousand dollars for a two-page court-approved form petition that
6 Plaintiff completed just to enhance their vanity and narcissism by getting their names in
7 newspapers. There is nothing more outrageous that an attorney could do to a client;
8 exemplary damages are essential to punish this unprovoked backstabbing of their own
9 client.

10 After Plaintiff learned of the unauthorized media blitz around July 2018 and fired
11 Defendants. Plaintiff retained new legal counsel who secured Plaintiff's Expungement on
12 November 6, 2018. Around the same time, Defendant Albert Watkins ("Judas") was
13 prosecuted for criminal contempt of court for the same type of conduct at issue in the case
14 at bar. Specifically, Judas violated a court "gag" order in a civil case where he represented
15 the ex-husband of Governor Greitens' mistress because he held a press conference on the
16 court steps after the gag order. The trial court judge stated in his order: "Your acts and
17 conduct in issuing the press release and conducting the press conference thwart and
18 defeat the authority of the Circuit Court of the City of St. Louis." Defendant Watkins is a
19 repeat offender for the same misconduct.

20 Now even though Plaintiff has a clean criminal record, the betrayal by his own
21 lawyers leaves permanent damage on the internet that takes no prisoners. Judas is
22 experienced in "news" media and knew this would occur. Defendants' actions were beyond

1 outrageous, and it was foreseeable that such a permanent stain would occur after
2 fabricating such a media blitz.

3 As a result of Defendants' misconduct, Plaintiff has suffered numerous economic
4 and non-economic damages, and paid tens of thousands in ongoing legal costs to fix false
5 and defamatory internet search results and statements resulting from their actions.

7 **III. CAUSES OF ACTION**

8 **1) LEGAL MALPRACTICE**

9 Plaintiff realleges and incorporates all prior paragraphs herein against all
10 defendants.

11 Plaintiff alleges that: (1) an attorney-client relationship between Plaintiff and
12 Defendants existed; (2) Defendants were negligent and/or breached their contract; (3)
13 Defendants' actions proximately caused plaintiff's damages; and (4) Plaintiff has suffered
14 and continues to suffer irreparable lifelong damages in the form of lost earnings, loss of
15 personal and professional reputation, emotional distress, and pain and suffering because
16 of Defendants' intentional misconduct. *Donahue v. Shughart, Thomson & Kilroy, P.C.*,
17 900 S.W.2d 624, 626 (Mo. banc 1995).

18 Plaintiff will have to change his name to attempt to regain any chance of living a
19 semi-normal life, and even then Plaintiff will have to report his name change on
20 employment applications, which defeats the purpose of Missouri Revised Statute
21 610.140.8 that states: "No person as to whom such order has been entered shall be held
22 thereafter under any provision of law to be guilty of perjury or otherwise giving a false

1 statement by reason of his or her failure to recite or acknowledge such arrests, pleas,
2 trials, convictions, or expungement in response to an inquiry made of him or her and no
3 such inquiry shall be made for information relating to an expungement.” Plaintiff will
4 have to provide information relating to his expungement because no employer would
5 believe him if he answered “No” to any questions about criminal convictions because of
6 Defendants’ media blitz against their own client just a few months before Plaintiff’s full
7 expungement. Defendants’ media blitz was fake news because there was no Clemency
8 application and could not have been any Clemency application. Defendants’ media blitz
9 defeated the whole purpose of an Expungement and directly violated Plaintiff’s instruction
10 to “fly below the radar.”

11 Had Defendants simply taken Plaintiff’s five thousand dollars and properly filed
12 and served the two-page Form Expungement Petition instead of creating a national media
13 circus, the conflict and case at bar would never have occurred. While Defendants did
14 things they were not retained to do, Defendants failed to properly serve the Expungement
15 Petition on any party. Specifically, after Plaintiff fired Defendants, on July 9, 2018 the
16 Court Clerk stated: “the court has no record of service returns on any party.”

17
18 **2) BREACH OF FIDUCIARY DUTY / CONSTRUCTIVE FRAUD**

19 Plaintiff realleges and incorporates all prior paragraphs herein against all
20 defendants.

21 “Whether characterized as breach of fiduciary duty or constructive fraud, the
22 elements of such a claim [that Plaintiff pleads] are: (1) an attorney-client relationship; (2)

1 breach of a fiduciary obligation by the attorney; (3) proximate causation; (4) damages to
2 the client; (5) no other recognized tort encompasses the facts alleged.” *Klemme v. Best*, 941
3 S.W.2d 493, 496 (Mo. 1997). “The second and fifth elements distinguish this claim from a
4 legal malpractice action. The rationale for the second element is clear: ‘[A] breach of the
5 standard of care is negligence, and a breach of a fiduciary obligation is constructive
6 fraud.” *Id.* “When an attorney intentionally commits an act of misconduct in
7 representing his or her client’s interest ... an action may lie for breach of fiduciary duty or
8 constructive fraud.” *Arana v. Koerner*, 735 S.W.2d 729, 735 (Mo. App. 1987).

9 10 **3) NEGLIGENCE**

11 Plaintiff realleges and incorporates all prior paragraphs herein against all
12 defendants.

13 Defendants failed “to exercise the degree of care which a reasonably prudent and
14 careful person would use under the same or similar circumstances.” *Jackson v. City of*
15 *Blue Springs*, 904 S.W.2d 322, 329 (Mo. App. 1995). Plaintiff alleges that Defendants had
16 (1) a legal duty to conform to a certain standard of conduct to protect Plaintiff against
17 unreasonable risks; (2) Defendants breached that duty; (3) there is a proximate cause
18 between Defendants’ conduct and Plaintiff’s resulting injury; and (4) Plaintiff sustained
19 actual damages. *Flora v. Amega Mobile Home Sales*, 958 S.W.2d 322, 323 (Mo. App. 1998).
20 A reasonable person would foresee that by contacting media sources, issuing press
21 releases, and involving the Associated Press that the ensuing internet articles would
22 create a permanent internet stain from conduct 23 years prior just a few months before a

1 full expungement would completely erase Plaintiff's criminal record consisting of one
2 conviction on one count.

3 The gist of Defendants' fabricated news involved the hypocrisy of Governor Greitens
4 making the same arguments to dismiss his Invasion of Privacy charge that Plaintiff made
5 over two decades before. Yet, Defendants' fraudulent intent to reference dismissed
6 charges from 23 years prior that were irrelevant to Clemency or Invasion of Privacy was
7 malicious. Defendants even included a Child Abuse charge in their media blitz even
8 though their client was never charged with Child Abuse, let alone convicted. These
9 actions reflect Defendants' malicious, oppressive, and fraudulent intent towards their own
10 client seeking Expungement. Defendants fabricated a fake news story about the Governor
11 regarding a Clemency that did not and could not happen. Defendants' actions were
12 sinister hypocrisy that permanently stained the record of a client they were hired to
13 Expunge and remain loyal and confidential.

14
15 **4) FRAUD**

16 Plaintiff realleges and incorporates all prior paragraphs herein against all
17 defendants.

18 Plaintiff hired Defendants for an Expungement, not a media blitz about a moot,
19 fabricated hypothetical Clemency that did not and could not happen, and that would
20 largely defeat the purpose of expungement because their actions would permanently scar
21 their own client for life. Defendants intentionally misrepresented that the scope of their
22 work was limited to expungement and concealed their true intent to drag Plaintiff's name

1 through the internet mud 23 years later by fabricating a fake story about a Clemency that
 2 did not and could not happen in order to get their names in a newspaper. Defendants
 3 fraudulently concealed the true intent of their request to privately discuss Clemency with
 4 the Governor's lawyers, whom they had another case with representing the ex-husband of
 5 Governor Greitens' mistress, into media press releases that with any degree of
 6 foreseeability would lead to the consequences at bar. Plaintiff reasonably relied upon
 7 Defendants' misrepresentations and suffered actual and permanent damages as set forth
 8 in this Complaint and proven at trial. *Kratky v. Musil*, 969 S.W.2d 371, 376 (Mo. App.
 9 1998).

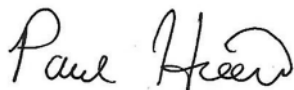
11 **5) INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

12 Plaintiff realleges and incorporates all prior paragraphs herein against all
 13 defendants. Defendants' actions were extreme and outrageous, and intentionally designed
 14 to and in fact did and still do inflict severe emotional distress.

16 **IV. PRAYER FOR RELIEF**

17 Plaintiff has suffered and continues to suffer actual damages. Plaintiff prays for
 18 not less than \$1,000,000 for economic and non-economic damages and punitive monetary
 19 damages according to proof at a trial BY JURY.

21 March 1, 2023



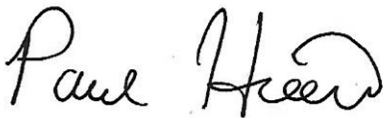
/S/ Paul Henreid – Plaintiff Pro Se
 1610 Nw 33rd St
 Lawton, Oklahoma 73505
 Phone: (661) 874-5233
 E-mail: phenre@gmail.com

V. SIGNATURE ATTESTATION

I hereby attest that I have on file all holographic signatures corresponding to any signatures indicated by a conformed signature (/S/) within this e-filed document.

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

March 1, 2023

A handwritten signature in black ink that reads "Paul Henreid". The signature is written in a cursive style with a large, looped 'P' and 'H'.

/S/ Paul Henreid
1610 Nw 33rd St
Lawton, Oklahoma 73505
Phone: (661) 874-5233
E-mail: phenre@gmail.com
Plaintiff – In Propria Persona

1 **VI. CERTIFICATION**

2

3 Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of

4 my knowledge, information, and belief that this complaint: (1) is not being presented for

5 an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase

6 the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for

7 extending, modifying, or reversing existing law; (3) the factual contentions have

8 evidentiary support or, if specifically so identified, will likely have evidentiary support

9 after a reasonable opportunity for further investigation or discovery; and (4) the complaint

10 otherwise complies with the requirements of Rule 11. I agree to provide the Clerk's Office

11 with any changes to my address where case-related papers may be served. I understand

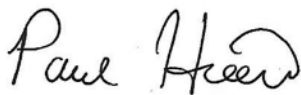
12 that my failure to keep a current address on file with the Clerk's Office may result in the

13 dismissal of my case.

14

15 I declare under penalty of perjury that the foregoing is true and correct on March 1, 2023.

16

17 

18 /S/ Paul Henreid
19 1610 Nw 33rd St
Lawton, Oklahoma 73505
20 Phone: (661) 874-5233
E-mail: phenre@gmail.com
21 Plaintiff – In Propria Persona

22

VII. PARTY INFORMATION

PARTIES TO THIS CIVIL COMPLAINT:

Plaintiff - Paul Henreid
1610 Nw 33rd St
Lawton, Oklahoma 73505
Telephone number: (661) 874-5233
E-mail address: phenre@gmail.com

Defendant #1
Kodner Watkins LC – Law Firm
1200 South Big Bend Blvd.
Saint Louis, Missouri 63117
Telephone number: (314) 727-9111
E-mail address: info@kwstllaw.com

Defendant #2
Albert Watkins, Esq. – Attorney
1200 South Big Bend Blvd.
Saint Louis, Missouri 63117
Telephone number: (314) 727-9111
E-mail address: al@kwstllaw.com

Defendant #3
Michael Schwade, Esq. – Attorney
1200 South Big Bend Blvd.
Saint Louis, Missouri 63117
Telephone number: (314) 727-9111
E-mail address: mschwade@kwstllaw.com

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

PAUL HENREID

(b) County of Residence of First Listed Plaintiff Comanche County
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Plaintiff in Propria Persona - 1610 Nw 33rd St
Lawton, OK 73505

DEFENDANTS

Kodner Watkins LC; Albert Watkins; Michael Schwade

County of Residence of First Listed Defendant Saint Louis
(IN U.S. PLAINTIFF CASES ONLY)NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|---------------------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input checked="" type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input checked="" type="checkbox"/> 4 |
| Citizen of Another State | <input checked="" type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability LABOR <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other INTELLECTUAL PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609 IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Brief description of cause:

Legal Malpractice; Breach of Fiduciary Duty/Constructive Fraud; Negligence; Fraud; and Intentional Infliction of Emotional Distress

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.DEMAND \$
1,000,000

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

March 1, 2023

SIGNATURE OF ATTORNEY OF RECORD

/S/ Paul Henreid



FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI

PAUL HENREID

Plaintiff,

v.

KODNER WATKINS LC; ALBERT
WATKINS; MICHAEL SCHWADE; ,
DOES 1-10

Defendant,

Case No.

ORIGINAL FILING FORM

**THIS FORM MUST BE COMPLETED AND VERIFIED BY THE FILING PARTY
WHEN INITIATING A NEW CASE.**

☐ THIS SAME CAUSE, OR A SUBSTANTIALLY EQUIVALENT COMPLAINT, WAS
PREVIOUSLY FILED IN THIS COURT AS CASE NUMBER _____
AND ASSIGNED TO THE HONORABLE JUDGE _____.

☐ THIS CAUSE IS RELATED, BUT IS NOT SUBSTANTIALLY EQUIVALENT TO ANY
PREVIOUSLY FILED COMPLAINT. THE RELATED CASE NUMBER IS _____ AND
THAT CASE WAS ASSIGNED TO THE HONORABLE _____. THIS CASE MAY,
THEREFORE, BE OPENED AS AN ORIGINAL PROCEEDING.

☒ NEITHER THIS SAME CAUSE, NOR A SUBSTANTIALLY EQUIVALENT
COMPLAINT, HAS BEEN PREVIOUSLY FILED IN THIS COURT, AND THEREFORE
MAY BE OPENED AS AN ORIGINAL PROCEEDING.

The undersigned affirms that the information provided above is true and correct.

Date: 03/01/2023

/s/ Paul Henreid
Signature of Filing Party

Paul Henreid