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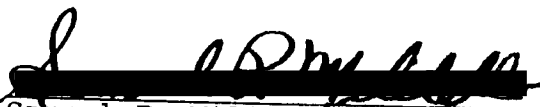
163. As a result of the Biggs intentional acts against O'Neill, O'Neill has been required to higher expensive counsel whose costs are not yet fully determined, but are expected to be close to Thirty Thousand (\$30,000.00) Dollars.

164. As a result of the these frivolous and unjustified intentional acts to embarrass and humiliate O'Neill in the public, the Biggs should be required to pay O'Neill's counsel fees and disbursements in this action.

WHEREFORE, O'Neill demand judgment against the Biggs:

- a. Denying the relief requested by the Biggs in each and every respect;
- b. Dismissing the causes of action of the Biggs, with prejudice;
- c. As to the first counterclaim, Damages in the amount of One Million (\$1,000,000.00) Dollars.
- d. As to the second counterclaim, Damages for rents in the amount of Five Hundred (\$500.00) Dollars per month for four (4) months for a total of Two Thousand (\$2,000.00) Dollars.
- e. Exemplary or punitive damages in an amount of \$10,000,000.00;
- f. Awarding O'Neill attorneys fees -as proof may establish- not yet fully determined, but are expected to be close to Thirty Thousand (\$30,000.00) Dollars.
- g. Awarding O'Neill the costs and disbursements of this action;
- h. Such other and further relief as the court deems just and proper.

Dated: June 28, 1999


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