

**IN THE SUPERIOR COURT OF DEKALB COUNTY
STATE OF GEORGIA**

MICHAEL S. MORRISON,	§	
Plaintiff,	§	
v.	§	Civil Action File Number:
ISAAC CADY,	§	_____
Defendant.	§	

**COMPLAINT FOR LIBEL AND DEFAMATION, HARASSING
COMMUNICATIONS, INTERLOCUTORY AND PERMANENT INJUNCTION,
ATTORNEY’S FEES, PUNITIVE DAMAGES AND OTHER RELIEF**

COMES NOW Plaintiff, MICHAEL S. MORRISON, and files this his Complaint for Libel and Defamation, Harassing Communications, Interlocutory and Permanent Injunction, Attorney’s Fees, Punitive Damages and Other Relief against Defendant, ISAAC CADY, showing to the Court the following:

1.

Defendant, Isaac Cady, is an individual Defendant subject to the jurisdiction and venue of this Honorable Court. Defendant may be served at the following address, to-wit: 1445 Woodland Hills Drive, Atlanta, Georgia 30324.

Introduction and Background

2.

Plaintiff Michael S. Morrison (hereinafter “Morrison”) and Defendant Isaac Cady (hereinafter “Cady”) are neighbors. Mr. Morrison resides at 1449 Woodland Hills Drive,

Atlanta, Georgia 30324 and Mr. Cady resides at 1445 Woodland Hills Drive, Atlanta, Georgia 30324.

3.

During the spring/summer, 2023, Cady began stalking and harassing Morrison and his family.

4.

During the summer of 2023, Cady routinely and repeatedly spied and surveilled Morrison's property as well as Morrison, his family and invited guests. Specifically, Cady often appeared on his rooftop looking down at Morrison's pool at the back of his property. Defendant often videotapes, while masturbating, Morrison's fiancé sunbathing by his pool.

5.

On July 26, 2023, the Atlanta Police Department created an incident report regarding Cady's conduct. A true and correct copy of said Incident Report is attached hereto as Exhibit "A."

6.

Cady obtained Morrison's fiancé's phone number from the Police Report and began texting her. Morrison's fiancé demanded that he cease and desist from contacting her and reported his conduct to the Atlanta Police Department.

7.

On November 22, 2023, Morrison approached Cady (speaking with him for the first time) requesting that he cease from removing the edging for a path that Morrison had constructed for Cady's mother. During the conversation, Cady picked up a hammer and threatened Morrison's person. Cady then contacted the police falsely claiming that Morrison threw water at him.

8.

Thereafter, Cady initiated at least two family violence stalking petitions against Morrison, seeking a temporary protective order and other relief. Both of Cady's stalking petitions were dismissed by this Court thereby denying Cady any relief against Morrison.

General Allegations

9.

Cady, frustrated by the dismissal of his legal actions against Morrison, posted on the parties' neighborhood "Next Door" website numerous false, misleading and defamatory statements concerning Morrison. A true and correct copy of the aforesaid posting is attached hereto as Exhibit "B."

10.

Cady's defamatory and false statements against Morrison include the following:

- (a) Cady accuses Morrison of being a "smut-peddler;"
- (b) Cady accuses Morrison of being a "general degenerate;"
- (c) Cady accuses Morrison of being a "blackmailer;"
- (d) Cady accuses Morrison of being a "trespasser;"

- (e) Cady accuses Morrison of being a "stalker;"
- (f) Cady accuses Morrison of being a "falsifier of evidence;"
- (g) Cady accuses Morrison of being a "falsifier of police reports" against Cady;
- (h) Cady accuses Morrison of being a narcissistic sociopath; and
- (i) Cady accuses Morrison of being a "pathological liar."

11.

In his published statements on the Next Door website, Cady further falsely published that Morrison is "currently under police investigation for battery against [Cady], stalking and trespassing on [Cady's] property." Such statements are false and defamatory as no law enforcement entity (federal, state, county or municipal) is currently investigating Morrison as set forth in Cady's published statements. Instead, it is Cady that is conducting a one-man "investigation/stalking and harassment" against Morrison.

12.

On February 23, 2024, counsel for Morrison wrote Cady a written demand concerning Cady's defamatory statement and a demand for a full retraction of the above-published statements by March 1, 2024. A true and correct copy of said demand is attached hereto as Exhibit "C."

13.

Cady failed and refused to publish any retraction whatsoever in response to Morrison's demand.

Count I
Libel and Defamation

14.

Morrison incorporates by reference paragraphs 1 through 13 of his Complaint as if fully set forth herein.

15.

Cady's defamatory statements and conduct towards Morrison constitute a false and malicious defamation against Morrison which has injured his reputation and exposed him to public hatred, contempt or ridicule.

16.

Cady's actions towards Morrison constitutes libel and defamation in accordance with O.C.G.A. § 51-5-1 *et seq.*

17.

Cady's social posts to third parties making false allegations against Morrison demonstrates that Cady has published these statements to third parties within the meaning set forth in O.C.G.A. § 51-5-3.

18.

Cady's false and defamatory statements towards Morrison constitutes libel *per se* within the meaning of O.C.G.A. § 51-5-5.

19.

Morrison is entitled to judgment against Cady for the damages caused by his false statements in an amount to be determined at trial, in an amount of at least \$500,000.

Count II
Harassing Communications

20.

Morrison incorporates by reference paragraphs 1 through 19 of his Complaint as if fully set forth herein.

21.

Cady has contacted third parties, via social media posts and other forms of electronic communications for the purpose of harassing, molesting, threatening or intimidating Morrison and/or his family members.

22.

Cady's communications with third parties regarding Morrison constitutes harassing communications within the meaning of O.C.G.A. § 16-11-39.1.

23.

Morrison is entitled to judgment against Cady for all damages caused by Cady's harassing communications in an amount to be determined at trial.

Count IV
Interlocutory and Permanent Injunction

24.

Morrison incorporates by reference paragraphs 1 through 23 of his Complaint as if fully set forth herein.

25.

Cady's actions are causing Morrison irreparable harm and substantial damages by materially harming his reputation, destroying his relationship with his friends and family and subjecting him to public ridicule.

26.

In accordance with O.C.G.A. §§ 9-5-1 *et seq.* and 9-11-65 *et seq.*, Morrison seeks an interlocutory and permanent injunction restraining Cady from continuing to make his defamatory, false and harassing statements to his family, friends, associates, neighbors and third parties.

27.

Morrison shows that (1) there is a substantial threat that he will suffer irreparable injury if the relief set forth herein is not granted; (2) the injuries being caused Morrison outweigh the threat and harm that the injunction may do to the Cady; (3) there is substantial likelihood that Morrison will prevail on the merits of his claims at trial; and (4) granting interlocutory injunction will not disserve the public interest.

28.

Morrison will suffer irreparable injury if an injunction preventing the Cady's further defamation is not granted.

Count IV
Punitive Damages

29.

Morrison incorporates by reference paragraphs 1 through 28 of his Complaint as if fully set forth herein.

30.

Cady's actions against Morrison show a willful misconduct, malice, fraud, wantonness, oppression and an entire want of care, which raises the presumption of Cady's conscious indifference to the consequences of his actions.

31.

Morrison is entitled to punitive damages in accordance with O.C.G.A. § 51-12-5.1

32.

Morrison prays for an award of punitive damages in an amount sufficient to penalize, punish or deter Cady from similar actions in the future, but no less than in an amount of \$250,000.

Count V
Attorney's Fees

33.

Morrison incorporates by reference paragraphs 1 through 32 of his Complaint as if fully set forth herein.

34.

Cady has acted in bad faith, has been stubbornly litigious and has caused Morrison unnecessary trouble and expense.

As a result of the foregoing, Morrison is entitled to an award of his attorney's fees and expenses of litigation in accordance with O.C.G.A. § 13-6-11.

WHEREFORE, Plaintiff demands judgment in his favor and prays for the following relief:

(a) Under Count I, that Plaintiff have judgment against Defendant for all damages caused by Defendant's libel and defamation of Plaintiff in an amount to be determined at trial, but not less than the sum of \$500,000;

(b) Under Count II, that Plaintiff have judgment against Defendant for all damages caused by Defendant's harassing communications in an amount to be determined at trial;

(c) Under Count III, that this Court enter an interlocutory and permanent injunction against Defendant restraining him from making any further, incorrect, defamatory, harmful or harassing statements against Plaintiff;

(d) Under Count IV, that Plaintiff be awarded punitive damages in an amount sufficient to deter Defendant from such wrongful conduct in the future, but not less than the sum of \$250,000;

(g) Under Count V, that Plaintiff be awarded his attorney's fees and expenses of litigation;

(h) For such other and further relief as the Court deems just and proper.

Smith & Liss, LLC

By: _____

Donald L. Cook, Jr.
Georgia Bar Number 183865
Attorney for Plaintiff

Five Concourse Parkway
Suite 2600
Atlanta, Georgia 30328
404-760-6000
dcook@smithliss.com



Atlanta Police Department

Case # 232061796 - Incident Report

REPORT DATE / TIME Jul 26, 2023 23:30	ZONE / BEAT / SUBDIVISION 4 / SUBDIVISION 5 6 / 613	EVENT START DATE / TIME - EVENT END DATE / TIME Jul 22, 2023 13:00 - Jul 25, 2023 12:00
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REPORT AUTHOR Abiodun Akingbona #7247	BODY WORN CAMERA? 1. Yes -- Video Footage Available
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REPORT TAKEN LOCATION
1739 CHESHIRE BRIDGE RD NE, ATL, GA 30324

1739 CHESHIRE BRIDGE RD NE, ATLANTA, GA 30324

NARRATIVE

On the 25th July 2023, I Officer A. Akingbona was flagged down at 1739 Cheshire Bridge on information to public indecency.

Mr. Micheal Morrison said, he had an issue with his neighbour that was masturbating when his girlfriend was in the pool located at the back of his house. He advised that this has been going on when ever his girlfriend go to the pool.

Mr. Morrison showed me some pictures showing his neighbour at the roof top looking down at the pool. The neighbour was later identified as Mr. Isaac Cady.

I spoke to Ms. Skyler Lipton-Smith, she advised on several occasion when she was at the pool, her neighbour (Mr. Isaac Cady) will come to his roof top window and started masturbating. She said, Mr. Cady will hold on to a phone and always keep his eyes on him with the other hand down.

I spoke to Mr. Cady and he said, he was out on the roof top to play (Banjo game). He said, he was not masturbating and he was not in good times with Mr. Morrison. He said, all is a lie, and he doesn't speak to him.

I advised him that he should stay away from the roof top when he notice that Ms. Lipton-Smith is out in the pool and I will advise her as well to avoid the pool when she noticed you are tat the roof top.

INCIDENT INFO

INCIDENT TYPE
Miscellaneous Non-crime

OFFENSE LOCATION
LOCATION NAME / STREET ADDRESS/LOCATION NAME / APT, UNIT, STE / DESCRIPTION
1449 WOODLAND HILLS DR NE

CITY NORTH DRUID HILLS	STATE GA	ZIP 30324	COUNTRY CODE US
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LOCATION CATEGORY Residence/ Home / Apartment / Condo	ZONE / BEAT / SUBDIVISION 4 / SUBDIVISION 5 Out of Jurisdiction / Out of Jurisdiction
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WITNESS-1
WITNESS-1 NAME (LAST, FIRST MIDDLE) DOB / ESTIMATED AGE RANGE
W-1 CADY, ISAAC DANIEL 1989-01-13

SEX Male	RACE / ETHNICITY White / Not Hispanic Or Latino	PHONE NUMBER (404) 606-0612 (primary, Mobile Phone)
-------------	--	--

HOME ADDRESS 1445 WOODLAND HILL DR, ATLANTA, GA 30324	BEEN AT LOCATION SINCE Jul 25, 2023
--	--

WITNESS-2

REPORTING OFFICER SIGNATURE / DATE Abiodun Akingbona #7247 Jul 28, 2023 15:04 (e-signature) PRINT NAME Abiodun Akingbona #7247	SUPERVISOR SIGNATURE / DATE Kelvin Walls #2578 Aug 1, 2023 14:17 (e-signature) PRINT NAME Kelvin Walls #2578
---	---

EXHIBIT " A "

WITNESS-2 NAME (LAST, FIRST MIDDLE) W-2 Morrison, Michael		DOB / ESTIMATED AGE RANGE 1968-06-15
SEX Male	RACE / ETHNICITY White / Unknown	PHONE NUMBER (305) 773-6137 (primary, Mobile Phone)
HOME ADDRESS 1449 WOODLAND HILL DR, ATLANTA, GA 30324		BEEN AT LOCATION SINCE Jul 25, 2023

WITNESS-3 WITNESS-3 NAME (LAST, FIRST MIDDLE) W-3 LIPTON-SMITH, SKYLER		DOB / ESTIMATED AGE RANGE 2000-12-29
SEX Female	RACE / ETHNICITY White / Not Hispanic Or Latino	PHONE NUMBER (770) 403-1760 (primary, Mobile Phone)
HOME ADDRESS 1449 WOODLAND HILL DR, ATLANTA, GA 30324		BEEN AT LOCATION SINCE Jul 25, 2023

STOP & THINK

- You were in a commercial or residential building or structure
- You were not immediately responding to a civilian 911 call

INVOLVED PERSONS

INVOLVED PERSON-1 NAME (LAST, FIRST MIDDLE) P-1 Morrison, Michael		DOB / ESTIMATED AGE RANGE 1968-06-15
SEX Male	RACE / ETHNICITY White / Unknown	PHONE NUMBER (305) 773-6137 (primary, Mobile Phone)
HOME ADDRESS 1449 WOODLAND HILL DR, ATLANTA, GA 30324		BEEN AT LOCATION SINCE Jul 25, 2023

INVOLVEMENT TYPE A
Reporting Party

INVOLVED PERSON-2 NAME (LAST, FIRST MIDDLE) P-2 LIPTON-SMITH, SKYLER		DOB / ESTIMATED AGE RANGE 2000-12-29
SEX Female	RACE / ETHNICITY White / Not Hispanic Or Latino	PHONE NUMBER (770) 403-1760 (primary, Mobile Phone)
HOME ADDRESS 1449 WOODLAND HILL DR, ATLANTA, GA 30324		BEEN AT LOCATION SINCE Jul 25, 2023

INVOLVEMENT TYPE A
Victim

INVOLVED PERSON-3 NAME (LAST, FIRST MIDDLE) P-3 CADY, ISAAC DANIEL		DOB / ESTIMATED AGE RANGE 1989-01-13
SEX Male	RACE / ETHNICITY White / Not Hispanic Or Latino	PHONE NUMBER (404) 608-0612 (primary, Mobile Phone)
HOME ADDRESS 1445 WOODLAND HILL DR, ATLANTA, GA 30324		BEEN AT LOCATION SINCE Jul 25, 2023

INVOLVEMENT TYPE A
Victim

INVOLVED LOCATIONS

LOCATION
1739 CHESHIRE BRIDGE RD NE, ATLANTA, GA 30324

PERSON ADDENDUM

FIRST NAME Michael	LAST NAME Morrison	DOB / ESTIMATED AGE RANGE 1968-06-15
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REPORTING OFFICER SIGNATURE / DATE
Ablodun Akingbona #7247 Jul 28, 2023 15:04 (e-signature)
PRINT NAME
Ablodun Akingbona #7247

SUPERVISOR SIGNATURE / DATE
Kelvin Walls #2578 Aug 1, 2023 14:17 (e-signature)
PRINT NAME
Kelvin Walls #2578

RACE / ETHNICITY White / Unknown		SEX Male	DECEASED <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
HOME ADDRESS-1 1449 WOODLAND HILL DR, ATLANTA, GA 30324			ENTERED DATE Jul 27, 2023	BEEN AT LOCATION SINCE Jul 25, 2023
PHONE NUMBER (305) 773-5137 (primary, Mobile Phone)		HEIGHT 6' 0"	WEIGHT 180 lbs	EYE COLOR Brown
HAIR COLOR / LENGTH / STYLE Black		DRIVER'S LICENSE # 055271501		DL STATE Georgia
DL STATUS Current/ Valid		DL CLASS CM (Regular License/Motorcycle)		

PERSON ADDENDUM

FIRST NAME ISAAC		LAST NAME CADY		MIDDLE NAME DANIEL	DOB / ESTIMATED AGE RANGE 1989-01-13
RACE / ETHNICITY White / Not Hispanic Or Latino		SEX Male	DECEASED <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		
HOME ADDRESS-1 1445 WOODLAND HILL DR, ATLANTA, GA 30324			ENTERED DATE Jul 27, 2023	BEEN AT LOCATION SINCE Jul 25, 2023	
PHONE NUMBER (404) 606-0612 (primary, Mobile Phone)		HEIGHT 6' 1"	WEIGHT 170 lbs	EYE COLOR Blue	
HAIR COLOR / LENGTH / STYLE Brown		DRIVER'S LICENSE # 052266651		DL STATE Georgia	
DL STATUS Current/ Valid		DL CLASS Class C			

PERSON ADDENDUM

FIRST NAME SKYLER		LAST NAME LIPTON-SMITH		DOB / ESTIMATED AGE RANGE 2000-12-29	
RACE / ETHNICITY White / Not Hispanic Or Latino		SEX Female	DECEASED <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		
HOME ADDRESS-1 1449 WOODLAND HILL DR, ATLANTA, GA 30324			ENTERED DATE Jul 27, 2023	BEEN AT LOCATION SINCE Jul 25, 2023	
PHONE NUMBER (770) 403-1760 (primary, Mobile Phone)		HEIGHT 5' 7"	WEIGHT 115 lbs	EYE COLOR Hazel	
HAIR COLOR / LENGTH / STYLE Blond		DRIVER'S LICENSE # 059900933		DL STATE Georgia	
DL STATUS Current/ Valid		DL CLASS Class C			

RELATIONSHIPS ADDENDUM

NAME	RELATIONSHIP	SUBJECT
Michael Morrison	NEIGHBOR OF	ISAAC DANIEL CADY
Michael Morrison	LOVER OF	SKYLER LIPTON-SMITH
SKYLER LIPTON-SMITH	NEIGHBOR OF	ISAAC DANIEL CADY

REPORTING OFFICER SIGNATURE / DATE Abiodun Akingbona #7247 Jul 28, 2023 15:04 (e-signature) PRINT NAME Abiodun Akingbona #7247	SUPERVISOR SIGNATURE / DATE Kelvin Walls #2578 Aug 1, 2023 14:17 (e-signature) PRINT NAME Kelvin Walls #2578
---	---

4:07

5G

Mail

Tokyo Valentino, himself, Michael Scott Morrison, multiple-time felon and federal convict, smut peddler, and general degenerate, and my next door neighbor, is trying to blackmail me with libelous information. He has threatened to host a website and send a flyer to the neighborhood. None of the information is true and it is entirely libel.

His intent is to blackmail me out of my inheritance from my elderly mother, which he somehow feels entitled to. He is currently under police investigation for battery against me, stalking, and trespassing on my property.

He has also been guilty of falsifying evidence and making false police reports against me.

I hate to have to make a post like this, but I thought I needed to get ahead of him and should give a heads-up, because his claims are so egregious. Even though his actions are illegal and purjure him for libel, he is a narcissistic sociopath and pathological liar and likely is unable to

EXHIBIT " B "

4:08

5G 

Mail

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I hope y'all are having a great day.

 3

 Like

 1





SMITH & LISS, LLC
ATTORNEYS & COUNSELORS AT LAW

FIVE CONCOURSE PARKWAY
SUITE 2600
ATLANTA, GEORGIA 30328
TELEPHONE: 404-760-6000
FACSIMILE: 404-760-0225
DIRECT: 404-760-0210
DCCOR@SMITHLISS.COM

February 23, 2024

VIA FEDERAL EXPRESS

Mr. Isaac Cady
1445 Woodland Hills Drive
Atlanta, Georgia 30324

RE: Defamation against Michael Morrison

**CEASE AND DESIST DEMAND
DEMAND FOR FULL RETRACTION**

Dear Mr. Cady:

As you are aware, I represent Michael Morrison. The purpose of this correspondence is to address recent postings you have made on the "Next Door" website concerning my client. Specifically, you have posted numerous false, misleading and defamatory statements concerning Mr. Morrison designed to intimidate, harass and cause harm to him and his family.

I am enclosing a screenshot of your recent publication. Among other things, you accuse my client of the following:

- Of being a smut peddler;
- General degenerate;
- Blackmailer;
- Trespasser;
- Stalker;
- Falsifier of evidence;
- Falsifier of police reports against you;
- Being a Narcissistic Sociopath; and
- Pathological Liar.

You also falsely published that Mr. Morrison is "currently under police investigation for battery against [you], stalking and trespassing on [your] property." Such statement is false and defamatory as no law enforcement entity (federal, state, county, municipal) is currently investigating Mr. Morrison as you falsely allege. Instead, it is you

EXHIBIT " C "

Mr. Isaac Cady
February 23, 2024
Page 2

that is conducting a one-man "investigation/stalking" and harassment against him. In fact, you are fully aware that the Superior Court of DeKalb County has dismissed, on at least two occasions, your stalking petitions against Mr. Morrison.

Your above-described conduct constitutes electronic stalking within the meaning of O.C.G.A. § 16-11-39.1 and defamation in accordance with O.C.G.A. § 51-5-5 *et seq.* Your false and defamatory statements against Mr. Morrison are so egregious and so calculated to cause harm and infamy against him that it constitutes libel *per se* under O.C.G.A. § 51-5-5, meaning damages are inferred and need not be proven.

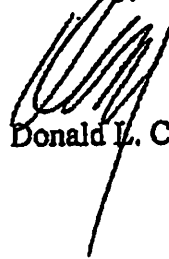
Based upon the above and foregoing, my client demands an immediate full written retraction of the above-described published statements on the Next Door website. Demand is hereby made that you publish a retraction by Friday March 1, 2024, and provide the undersigned counsel with a copy of the same. The retraction should advise the public that all of your previous statements and allegations against Mr. Morrison are FALSE and you retract all of said statements against him.

Demand is further made that you cease and desist from making any further false and defamatory statements against Mr. Morrison and cease and desist from any further electronic or personal stalking of him and his family.

Your failure to take the above-described actions shall result in Mr. Morrison initiating a defamation/stalking complaint against you in a court of competent jurisdiction where he will seek a full measure of damages against you, punitive damages and attorney's fees.

Govern yourself accordingly.

Sincerely,



Donald L. Cook, Jr.

Enclosure
Copy to:
Mr. Michael Morrison
DLC:tvh

4:07

5G

Mail

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 Like  1 