

VIRGINIA:

IN THE CIRCUIT COURT FOR FAUQUIER COUNTY

WAT LAO BUDDAVONG, INC.,  
3043 Catlett Road  
Catlett, VA 20119

Plaintiff,

vs.

SOUKSOMBOUN SAYASITHSENA,  
7313 Wayne Drive,  
Annadale, Virginia 22003

LAMKEO SYSAVA,  
10302 Copland Drive  
Manassas, Virginia 20109

MIXAY PANYASITH,  
5732 Wood Creekland  
Centreville, Virginia 20120

KHAMLA STEVENS,  
3383 Nadia Loop  
Woodbridge, Virginia 22193

WATT SENGKHYAVONG,  
9155 Ogden Park Court  
Bristow, Virginia 20136

ONLA INTCHICHAK,  
7313 Wayne Drive  
Annandale, Virginia

Case NO. CL 20-122

PLEA IN BAR

FILED AT 10:00 A M

APR 20 2020

GAIL H. BARB, CLERK

BY: SMH D.C.

KIMBERLY RICHARDS,  
7185 Kings Highway  
King George, Virginia 22483

Defendants.

## PLEA IN BAR

### **DEFENDANTS LAMKEO SYSAVA, MIXAY PANYASITH, KHAMLA STEVENS, WATT SENGKHYAVONG, ONLA INTHICHAK, and KIMBERLY RICHARDS' PLEA IN BAR**

COMES NOW, DEFENDANTS LAMKEO SYSAVA ("SYSAVA"), MIXAY PANYASITH ("PANYASITH"), KHAMLA STEVENS ("STEVENS"), WATT SENGKHYAVONG ("SENGKHYAVONG"), ONLA INTHICHAK (INTHICHAK"), and KIMBERLY RICHARDS ("RICHARDS") (collectively the "DEFENDANTS") and hereby files this Plea In Bar

Defendant SOUKSOMBOUN SAYASITHSENA ("SAYASITHSENA") filed a Plea in Bar on April 2, 2020. DEFENDANTS hereby adopt by reference the arguments contained therein. Specifically, Defendants adopt by reference, including but not limited to the following arguments:

1. DEFENDANTS aver that consideration of the present action by this Honorable Court is barred by the Free Exercise Clause of the First Amendment to the Constitution of the United States and Article I, § 16 of the Constitution of Virginia. (See SAYASITHSENA Plea in Bar at Section A).
2. Any litigation or related actions by DEFENDANTS, if any, that are alleged to have caused Plaintiff harm or form the basis of any claim are protected by the Noerr-Pennington doctrine. (See SAYASITHSENA Plea in Bar at Section B).
3. The Plaintiff Corporation was not a defendant to the previous lawsuit and has no standing to raise certain of these claims that are based upon the previous lawsuit. (See SAYASITHSENA Plea in Bar at Section C).
4. DEFENDANTS adopt by reference all other arguments set forth in SAYASITHSENA Plea in Bar.

Dated this 17 day of April, 2020.

Respectfully submitted,



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NOTICE OF SERVICE

Please take notice that a copy of the foregoing was mailed on the 17 day of April, 2020  
to:

August McCarthy  
70 Main Street, Suite 23  
Warrenton, VA 20186  
Counsel for Plaintiff.

