STATE OF NORTH CAROLINA COUNTY OF FORSYTH	IN THE GENERAL COURT OF JUSTICE SUPERIOR COURT DIVISION NO. 25-CVS- _____ 25CV011763-330
BRIDGET SULLIVAN Plaintiff, v. PATRICK HARRIGAN, Defendant.	**COMPLAINT**

Plaintiff BRIDGET SULLIVAN, by and through undersigned counsel, complaining of the defendant, alleges and says:

PARTIES AND JURISDICTION

1. Plaintiff is a citizen and a resident of Forsyth County, North Carolina. Plaintiff is a 2017 graduate of High Point University where she received a bachelor's degree in Exercise Science, Cum Laude, Presidential Scholar, and Dean's List. Plaintiff thereafter received a master's degree in athletic training through an Accredited Athletic Training Education Program, receiving the Dr. Ryan Carr Award for Excellence in Athletic Training.

2. Upon information and belief, Defendant is an individual, a citizen and a resident of Catawba County, North Carolina. Defendant as described herein acted solely in his individual capacity and is sued solely in his individual capacity. Upon information and belief, Defendant and his wife own and operate a company in North Carolina that manufactures and sells automatic rifles (AR-15s) and parts.

3. On or about September 12, 2025, and thereafter, Defendant falsely published repeatedly that Wake Forest University "FIRED" Plaintiff, after he contacted the school, for

Electronically Filed Date: 10/3/2025 5:05 PM Forsyth Superior Court County Clerk of Superior Court

exercising her personal free speech in a manner with which he disagreed. In formulating his defamatory comment regarding Plaintiff's professional status, Defendant displayed intentional, willful, wanton, and/or malicious conduct, and reckless disregard for the rights and safety of Plaintiff.

4. This Court has jurisdiction over this matter pursuant to N.C. Gen. Stat. § 1-75.4 as the events substantially occurred within the state of North Carolina, specifically in Forsyth County.

5. Venue is proper in Forsyth County as the events surrounding this complaint substantially occurred within Forsyth County and Plaintiff resides in Forsyth County.

FACTUAL ALLEGATIONS

6. In 2020, Plaintiff began her employment with Wake Forest University as an Assistant Athletic Trainer, responsible for the Women's Soccer Team. Over the next five years, Plaintiff performed her job duties in an outstanding manner. Plaintiff devoted hour upon hour to be available at all practices, games, workout, and training sessions for the Wake Forest Women's Soccer Team, including all associated travel and the teams' 2024 run to the NCAA National Championship game. Plaintiff was a respected and beloved member of the team staff and of the Wake Forest community at large.

7. For several years, Plaintiff has maintained a personal Instagram social media account that she has kept separate from her professional work. Plaintiff uses the account to participate and comment on her individual activities and thoughts. The account is not associated with Wake Forest University.

8. On September 11, 2025, exercising her 1st Amendment right of free speech, Plaintiff posted the following words on her personal Instagram account, "He had it coming, he had it coming This audio is all I have to say about that." ("Plaintiff's post").

9. On Friday September 12, 2025, an unknown source juxtaposed Plaintiff's post with her online biography at Wake Forest University and her school photo. The unknown source then published his or her post online. ("Anonymous post"). Thereafter, at about 2:01 p.m. that same day, Defendant broadcast the Anonymous post on social media to 3800 viewers, stating that he "contacted @WakeForest regarding these reports... Anything less than firing her is an endorsement of it." That afternoon into the weekend, Plaintiff and Wake Forest began receiving numerous safety threats and other derogatory comments, many of which demanded that Plaintiff be fired or harmed.

10. On Saturday, September 13, 2025, a Wake Forest University representative contacted Plaintiff to discuss the situation and safety measures for Plaintiff. The next day, September 14, Wake Forest and its police department instituted additional security measures for both Plaintiff and the Women's Soccer game taking place that day. Also on September 14, 2025, after discussions between Plaintiff and Wake Forest about the continued safety concerns for Plaintiff as an employee, Plaintiff and Wake Forest mutually agreed that it would be best to part ways.

11. Wake Forest University did not fire or terminate Plaintiff. Upon information and belief, no Wake Forest representative issued such a statement to Defendant, to the school at large, to the press, or to the public. Such a statement was and is false.

12. Nevertheless, on September 16, 2025, at approximately 4:20 p.m., Defendant published the following on social media, "UPDATE: I'm happy to report that after I contacted @WakeForest, Bridget has been FIRED for celebrating Charlie Kirk's assassination. Even better, the university is giving full support to students launching a @TPUSA chapter." Defendant's post

had 546 comments, 4,400 retweets, 23,000 likes, and 874,000 views. Thereafter, Defendant posted two other similar statements indicating Plaintiff was "Fired" at 4:49 p.m. and 4:59 p.m.

13. On September 17, 2025, citing Defendant's post, The Charlotte Observer and the Raleigh News and Observer published a story under the headline, "Wake Forest athletic trainer fired after social media comment about Charlie Kirk." Defendant then reposted the News and Observer headline at 4:30 p.m. that day. The news of the false "firing" immediately spread far and wide. On September 17, 2025, the Union-Bulletin newspaper in Walla-Walla, Washington reported, "A Wake Forest athletic trainer has been fired after celebrating the assassination of Charlie Kirk," thereafter mentioning Plaintiff by name.

14. On September 19, 2025, the Winston-Salem Journal followed suit by publishing a front-page headline stating that, "WFU Fires trainer after Kirk comment." The article included Defendant's false post (originally to 874,000 views) as the source of the false allegation. The Charlotte, Raleigh, and Winston-Salem newspapers combined have the largest circulation of print newspapers in North Carolina and have unknown numbers of online readers nationwide. The news articles all relied on Defendant as the source of the false "firing" allegation, which quickly spread to an even wider national audience in the five days following Plaintiff's departure from Wake Forest.

15. Defendant's statement was a false representation of fact. Wake Forest University did not fire Plaintiff, nor did Wake Forest issue any such statement. Nevertheless, Defendant's false, defamatory statement about Plaintiff's profession and reputation remains forever online.

16. Defendant's false statement has harmed Plaintiff's personal and professional reputation, and exposed Plaintiff to ridicule, hatred, contempt, and safety threats. Defendant

intentionally published his statement to numerous third persons to inflict such harm to Plaintiff, among other reasons.

17. Defendant made the false statement through one or more of the following methods of conduct: negligence, gross negligence, intentional, malicious, a reckless disregard for the truth of the statement, and by failing to exercise ordinary care to determine the truth or falsity of the statement. Defendant knew or should have known through the exercise of ordinary care that the statement was false.

FIRST CLAIM FOR RELIEF

LIBEL PER SE

18. Plaintiff incorporates the allegations contained in paragraphs 1 through 21 as if fully set forth herein.

19. Defendant repeatedly wrote, printed, or caused to be printed the following statement about Plaintiff: "UPDATE: I'm happy to report that after I contacted @WakeForest, Bridget has been FIRED for celebrating Charlie Kirk's assassination." Defendant also reposted the resulting news reports as set forth above.

20. Defendant knowingly published the statement to third persons.

21. The statement was and is false.

22. At the time Defendant published the statement, he knew the statement was false or he failed to exercise ordinary care to determine whether the statement was false.

23. The statement impeached Plaintiff in her trade and profession, and the statement subjected Plaintiff to ridicule, contempt, and disgrace. Third persons who read the statement reasonably understood that the statement impeached Plaintiff in her trade and profession, and subjected Plaintiff to ridicule, contempt, or disgrace.

24. As a direct and proximate result of Defendant's conduct, Plaintiff has suffered reputational harm, as well as economic and emotional damage, including pain and suffering, in excess of $25,000.00.

25. As a direct and proximate result of Defendant's willful, wanton, intentional, and/or malicious conduct, Plaintiff is entitled to an award of punitive damages in excess of $25,000.00.

SECOND CLAIM FOR RELIEF

LIBEL PER QUOD

26. The plaintiffs incorporate the allegations contained in paragraphs 1 through 29 as if fully set forth herein.

27. Defendant wrote, printed, or caused to be printed the following statement about Plaintiff: "UPDATE: I'm happy to report that after I contacted @WakeForest, Bridget has been FIRED for celebrating Charlie Kirk's assassination." Defendant also reposted the resulting news reports as set forth above.

28. Defendant knowingly published the statement to third persons.

29. The statement was and is false.

30. At the time Defendant published the statement, he knew the statement was false or he failed to exercise ordinary care to determine whether the statement was false.

31. Defendant intended for the statement to impeach Plaintiff in her trade and profession, and Defendant intended for the statement to subject Plaintiff to ridicule, contempt, and disgrace.

32. Third persons who read the statement reasonably understood that the statement impeached Plaintiff in her trade and profession, and subjected Plaintiff to ridicule, contempt, or disgrace.

33. As a direct and proximate result of Defendant's conduct, Plaintiff has suffered reputational harm, as well as economic and emotional damage, including pain and suffering, in excess of $25,000.00.

34. As a direct and proximate result of Defendant's willful, wanton, intentional, reckless, and/or malicious conduct, Plaintiff is entitled to an award of punitive damages in excess of $25,000.00.

THIRD CLAIM FOR RELIEF

PUNITIVE DAMAGES

35. The plaintiffs incorporate the allegations contained in paragraphs 1 through 38 as if fully set forth herein.

36. Defendant posted, reposted, and spoke in other forums on more than one occasion that Wake Forest University "FIRED" Plaintiff, using all capital letters to highlight the falsity. Defendant sought personal exposure, recognition, and an increased market for himself and consequently for his business, upon information and belief, by stating that Wake Forest "FIRED" Plaintiff after his contact with Wake Forest, indicating that he had personal influence over Wake Forest University sufficient to cause the firing of an employee with whom he disagreed.

37. As alleged above, Defendant's conduct was undertaken in a willful, wanton, intentional, and/or malicious manner, and violated N. C. Gen. Stat. § 1D-15. Plaintiff is entitled to an award of punitive damages in excess of $25,000.00.

WHEREFORE, Plaintiff hereby respectfully prays for the following relief:

1. That Plaintiff have and recover from Defendant a sum in excess of Twenty-Five Thousand Dollars ($25,000.00) as compensatory damages for present and future medical and other

expenses, lost wages, pain and suffering, emotional distress, reputational damage, and other damage to be determined by a jury, for Plaintiff's FIRST CLAIM FOR RELIEF.

2. That Plaintiff have and recover from Defendant a sum in excess of Twenty-Five Thousand Dollars ($25,000.00) as compensatory damages for present and future medical and other expenses, lost wages, pain and suffering, emotional distress, reputational damage, and other damage to be determined by a jury, for the Plaintiff's SECOND CLAIM FOR RELIEF.

3. That Plaintiff have and recover from Defendant a sum in excess of Twenty-Five Thousand Dollars ($25,000.00) as punitive damages for the above THIRD CLAIM FOR RELIEF.

4. That the court grant a trial by jury;

5. That the costs of this action, including a reasonable attorney's fee as allowed by law and interest from the date of filing of this complaint, be taxed against the Defendant; and

6. For such other and further relief as the Court deems just and proper.

This the 3rd day of October, 2025.

Walter C. Holton Jr.

Walter C. Holton, Jr.
Attorney for Plaintiff
NCSB # 12698
HOLTON LAW FIRM, PLLC
857 W. Fifth Street
Winston-Salem, NC 27101
Phone: (336) 777-3480
Fax: (336) 722-3478
wholton@walterholton.com