V I R G I N I A

IN THE CIRCUIT COURT OF

\*

Plaintiff \*

\*

v. \* Case No.

\*

\*

\*

Defendant \*

COMPLAINT

(Slander Per Quod)

COMES NOW the plaintiff, by counsel, and in support of this Complaint states as follows:

1. The plaintiff resides at the address listed in the caption of this matter.

2. The defendant resides at the address listed in the caption of this matter.

3. On or about the day of , 199 the defendant did encounter the plaintiff at and did intentionally and maliciously address the following remarks to the plaintiff in the full hearing of several passersby:

4. The above quoted remarks are from their ordinary construction, insulting and tend to lead to violence and breach of the peace. The defendant knew that such remarks were false, defamatory, slanderous, and insulting and made them with the intent of injuring the plaintiff's good reputation.

5. As a proximate result of said false, malicious, insult­ing, defamatory, and slanderous remarks the plaintiff has been caused to suffer certain humiliation, embarrassment, shame, injury to his reputation and feelings, and financial loss.

WHEREFORE, these premises considered, the plaintiff requests judgment against the defendant in the amount of $ , in compensatory damages and $ , in punitive damages, plus an award of costs and interest and such other relief as may be appropriate.

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*Counsel for*

**Interrogatories and Request for Documents are served along with this Complaint**