V I R G I N I A

 IN THE CIRCUIT COURT OF

 \*

Plaintiff \*

 \*

v. \* Case No.

 \*

 \*

 \*

Defendant \*

 COMPLAINT

 (Slander Per Se)

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 slanderous per se in that

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

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.

 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 Brien A. Roche, Esq., VSB No. 16165

Johnson & Roche

8355A Greensboro Drive

McLean, Virginia 22102

*Tel.:* (703) 821-3740

*Fax:* (703) 790-9462

brienroche@aol.com

*Counsel for*

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