

**IN THE CIRCUIT COURT OF                      COUNTY, MISSISSIPPI**

**PLAINTIFF**

**VS.**

**CIVIL ACTION NO.**

**DEFENDANT**

**COMPLAINT**

COMES NOW,                      , Plaintiff and files this Complaint against                      , Defendant, and in support thereof shows the following facts and matters, to-wit:

**PARTIES AND JURISDICTION**

1.        That Plaintiff is an adult citizen of                      County, Mississippi, who resides at                      ,                      , Mississippi, and that Plaintiff has been a resident of the State of Mississippi for more than one year next preceding the filing of this Complaint.

2.        That the Defendant is an adult resident citizen of                      County,                      , whose address is unknown; and, who may be served with the process of the Court at his/her place of employment,                      ,                      ,                      .

**FACTS**

3.        That Plaintiff was the lawful wedded husband/wife of                      to whom he/she was married for approximately                      years prior to the relationship that developed between Defendant and                      .

4.        That Defendant willfully, actively, wrongfully and intentionally interfered with the martial relationship of Plaintiff and his/her husband/wife,                      thereby causing an alienation of                      affections toward the Plaintiff; and, by reason thereof, depriving Plaintiff of the society, companionship and marital harmony to which was entitled by virtue of their marriage.

5.        That Defendant willfully, actively, wrongfully and intentionally interfered with the marriage of Plaintiff and                      to the extent that                      abandoned his/her marriage to Plaintiff and their children; and, Defendant unduly influenced                      to the extent that Defendant maintained and promoted the continuance of an adulterous relationship between Defendant and                      , said relationship having been discovered by Plaintiff on or about                      when Plaintiff found Defendant and                      together at                      ,                      , Mississippi, involved in what Plaintiff, from the circumstances, he/she believed to be a meeting for sexual intercourse.

6.        That Defendant allowed and encouraged                      to cohabit with him/her from time to time while Plaintiff and                      were married; that while Plaintiff and                      were married,

Defendant regularly encouraged, promoted and demanded that \_\_\_\_\_ maintain a sexual relationship with him/her which interfered with any possible reconciliation of their marriage; and, that the said actions of the Defendant ultimately resulted in the filing of a divorce between \_\_\_\_\_ and \_\_\_\_\_.

7. That the Defendant, during the marriage of \_\_\_\_\_, openly dated and let it be known that he/she and said \_\_\_\_\_ were conducting an illicit and immoral relationship; and, that the said actions of the Defendant were willful, malicious and intended to cause the breakdown of the marriage of \_\_\_\_\_ to \_\_\_\_\_ to the extent that a divorce would occur between them, which ultimate goal of Defendant was realized by her through her said malicious and willful actions.

8. That Defendant has caused Plaintiff the loss of a husband/wife who, inter alia, provided for Plaintiff and caused the loss of his/her husband/wife as a full time father to the children of Plaintiff and \_\_\_\_\_; that \_\_\_\_\_ is a \_\_\_\_\_ by profession, he/she having obtained his/her profession while Plaintiff and he/she were married, and that Defendant's actions in destroying their marriage has deprived Plaintiff of much of the future income his/her husband/wife will earn; that the actions of Defendant have caused acute emotional and physical distress to Plaintiff to the extent that he/she has not been able to properly perform as a \_\_\_\_\_ in his/her customary manner and his/her professional practice as a \_\_\_\_\_ has suffered as a direct result of the aforementioned intentional, emotional and physical distress that Plaintiff has suffered as a result of Defendant's actions in alienating the affections of \_\_\_\_\_ from Plaintiff.

9. That Defendant has interfered with Plaintiff's relationship with his/her children by maintaining a sexual relationship with him/her husband/wife, \_\_\_\_\_ when he/she should and could be with his/her minor children.

10. That knowledge of Defendant's interference with \_\_\_\_\_ relationship with his/her minor children has caused Plaintiff great emotional distress and harm; and, that said emotional distress and harm was the result of Defendant's willful and intentional acts.

11. That Defendant has endangered the financial support of his/her minor children by causing the dissolution of Plaintiff's marriage to \_\_\_\_\_; that Plaintiff and his/her minor children have suffered extreme emotional and physical distress and harm as a result of Defendant's said actions which caused the dissolution of their marital relationship; and, all of which has reduced the financial income to Plaintiff and his/her two minor children because \_\_\_\_\_ now has two households to distribute his/her income between.

12. That Defendant, through sexual enticement, gifts and vacations provided to by him/her encouraged and was intentionally designed by Defendant to destroy Plaintiff's marriage to \_\_\_\_\_; and, as a result thereof, Plaintiff's minor children are now permanently deprived of time with their father/mother and has subjected Plaintiff and his/her minor children to a life without the children's father/mother and the Plaintiff's husband/wife which has caused a void in their lives that can never be filled; that Defendant knew, or should have reasonably known, that his/her acts in enticing and seducing \_\_\_\_\_ away from his/her husband/wife and children would result in extreme financial hardship for Plaintiff and his/her minor children, as well as a great emotional and physical distress and harm.

13. That Defendant has by his/her acts and deeds intentionally, or if not intentionally, negligently alienated the affections of \_\_\_\_\_ from Plaintiff thereby violating Plaintiff's marital harmony with his/her spouse.

14. That as a result of the aforesaid intentional acts on the part of the Defendant, Plaintiff has suffered serious and grievous injuries including the loss of love and affection from \_\_\_\_\_, loss of consortium with \_\_\_\_\_, mental agony and anguish, humiliation, damage to his/her honor, destruction of his/her family life and wounded sensibilities; and, that Defendant through her actions has committed outrageous and actionable conduct, inflicted upon Plaintiff emotional and physical distress and suffering and mental trauma entitling Plaintiff to actual damages for full compensation for such injuries.

15. In the alternative, if Defendant's said actions were not intentional, then they were grossly negligent and Defendant should have known that said actions on his/her part would produce the results and damages to Plaintiff and his/her children herein complained of.

16. That Defendant's said acts were willful, intentional and malicious, or in the alternative, grossly negligent and he/she knew or should have known that his/her actions would produce the complained of damages to Plaintiff and his/her children; and, as such entitles Plaintiff to recover actual as well as punitive damages for Plaintiff's damages and loss herein complained of; and, that the said actions on the part of Defendant entitle Plaintiff to attorney's fees.

#### RELIEF REQUESTED

17. WHEREFORE, Plaintiff brings this action and demands judgment of, from and against the Defendant in the sum of \$ \_\_\_\_\_ as actual damages and \$ \_\_\_\_\_ as punitive damages, together with reasonable attorney's fees; and, that Defendant should be assessed with all costs accruing in this action.

Respectfully submitted,

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Attorney for

Of counsel:

Telephone:

MSB #  
Attorney for