

IN THE CIRCUIT COURT OF COUNTY, MISSISSIPPI

PLAINTIFF

VS.

NO.

DEFENDANT

COMPLAINT

COMES NOW the Plaintiffs, , and files this their Complaint against , and in support thereof would show the following, to-wit:

I.

That the Plaintiffs, , are adult resident citizens of County, Mississippi, and that said are licensed to do business and is doing business in and County, Mississippi, as .

II.

That the Defendant, , is an adult resident citizen of County, Mississippi, and is licensed to do business and is doing business in , and County, Mississippi, as .

COUNT I

III.

That the Defendant and/or his/her agents willfully, maliciously and intentionally inflicted emotional distress upon the Plaintiffs without just cause with the intent of harming the Plaintiffs and, as a direct and proximate cause of Defendant's and or his/her agents actions, the Plaintiffs were in fact irreparably harmed by the Defendant and or his/her agents.

COUNT II

IV.

That the Defendant and or his/her agents have intentional, maliciously, and without just cause, slandered the Plaintiffs' names, business and reputations in the community by making knowingly false, malicious and intentional statements about the Plaintiffs, Plaintiffs' family, and the Plaintiffs' business, and as a direct and proximate cause thereof the Defendant and or his/her agents have irreparably harmed the Plaintiffs and their business, .

COUNT III

V.

That the Defendant and or his/her agents have intentionally, maliciously and without just cause, engaged in deceitful business practices and malicious and intentional fraud that were calculated to harm the Plaintiffs and their business and as a direct and proximate cause thereof the Plaintiffs and their business have been irreparably harmed.

VI.

That as a result of Defendant's actions Plaintiffs were forced to retain an attorney and have incurred costs for which Defendant is liable.

WHEREFORE PREMISES CONSIDERED, Plaintiffs demand a judgment of and from the Defendant in the sum of (\$) in actual damages and (\$) as punitive damages along with a reasonable attorney fee and all cost.

WHEREFORE PREMISES FURTHER CONSIDERED, Plaintiffs further pray that this Court will issue a temporary injunction against the Defendant and preventing said Defendant and or his/her agents from continuing to harm Plaintiffs and in the manner set out above in that Plaintiffs have no other remedy in law or equity and will be irreparably harmed should said injunction not be issued.

Plaintiffs pray for such other relief as in law or equity they may be entitled.

This the day of , 20 .

Respectfully submitted,

Attorney for

Of counsel:

Telephone:
MSB #
Attorney for