

Complaint For Libel Against Publisher of Newspaper

IN THE _____ COURT OF _____ (County), _____ (State)

PLAINTIFF

V.

CAUSE NO. 000,0000

DEFENDANT

COMPLAINT

COMES NOW _____ (_____), Plaintiff in the above-styled and numbered cause, by and through his attorneys, and files this his Complaint against Defendant, _____, **Inc.**, (_____), and in support thereof would show unto the Court the following matters and facts:

1. Plaintiff _____ is an adult resident citizen of _____
(city, county, state).
2. _____ is a corporation organized and existing under the laws of the state of _____, with its principal office located at _____
(street address, city, county, state, zip code), and may be served with process and other writs of this Court at _____ (street address, city, county, state, zip code).
3. On _____ (date), Defendant's agents wrote the following about Plaintiff: (describe).
4. Said writing contained the following false and defamatory matter: _____
_____ (specify).
5. The defamatory matter was delivered by Defendant's agents to _____ (name), to be read by such person. The writing was in fact read by such person and others.
4. In making the defamatory communication, Defendant's agents intended it to mean _____
_____ (specify meaning).

The persons to whom the defamatory matter was communicated understood the words to have such meaning.

5. The defamatory matter was calculated to cause, and did cause, great injury to Plaintiff's reputation, in that _____
_____ *(detail injury)*.

6. At the time of the defamatory publication, Defendant's agents knew that the words were untrue, and in making the defamatory publication, Defendant's agents acted with malice toward Plaintiff.

7. Plaintiff has always enjoyed a good reputation for _____
_____ *(specify, for example: honesty, uprightness of character, and truthfulness)*.

8. *(The following should be stated in jurisdictions having statutes making a demand for retraction a condition precedent to an action for libel):*

On _____ *(date)* Plaintiff demanded a retraction in writing, by Defendant's agents, of the defamatory statement. Following receipt of Plaintiff's demand for a retraction, Defendant's agents failed and refused, and still continue to fail and refuse, to comply with the demand.

9. As a result of Defendant's publication, Plaintiff sustained the following damages:
- a. General damages in the sum of \$ _____ ; and
 - b. Punitive or exemplary damages in the sum of \$ _____ .

Wherefore, Plaintiff requests judgment against Defendant for:

1. General damages in the amount of \$ _____ ;
2. Punitive damages in the amount of \$ _____ ;
3. Costs of suit; and
4. Such other and further relief as this court may deem just and proper.

Respectfully submitted,

By: _____
(Name of Attorney)

State Bar No. _____

One of His Attorneys

OF COUNSEL:

Name of Attorney

Address of Attorney

Telephone: _____