

IN THE CIRCUIT COURT OF _____ COUNTY, _____

NAME OF PLAINTIFF

V.

NAME OF DEFENDANT

NO. _____

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, _____, who resides at _____, and that Plaintiff has been a resident of the State of _____ 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 her place of employment, _____.

FACTS

3. That Plaintiff was the lawful wedded wife of _____ to whom 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 her husband, _____ thereby causing an alienation of _____'s 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 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

_____ involved in what Plaintiff, from the circumstances, she believed to be a meeting for sexual intercourse.

6. That Defendant allowed and encouraged _____ to cohabit with 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 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 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 who, inter alia, provided for Plaintiff and caused the loss of her husband as a full time father to the two children of Plaintiff and _____; that _____ is a recruiter for a trucking company by profession, he having obtained his profession while Plaintiff and he were married, and that Defendant's actions in destroying their marriage has deprived Plaintiff of much of the future income he; husband will earn; that the actions of Defendant have caused acute emotional and physical distress to Plaintiff to the extent that she has not been able to properly perform as a secretary in her customary manner and her professional practice as a secretary 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 her two children by maintaining a sexual relationship with her husband, _____ when he should and could be with his minor children.

10. That knowledge of Defendant's interference with _____'s relationship with his 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 her minor children by causing the dissolution of Plaintiff's marriage to _____; that Plaintiff and 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 her two minor children because _____ now has two households to distribute his income between.

12. That Defendant, through sexual enticement, gifts and vacations provided to _____ by 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 and has subjected Plaintiff and her minor

children to a life without the children's father and the Plaintiff's husband which has caused a void in their lives that can never be filled; that Defendant knew, or should have reasonably known, that her acts in enticing and seducing _____ away from his wife and children would result in extreme financial hardship for Plaintiff and her minor children, as well as a great emotional and physical distress and harm.

13. That Defendant has by her acts and deeds intentionally, or if not intentionally, negligently alienated the affections of _____ from Plaintiff thereby violating Plaintiff's marital harmony with 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 her honor, destruction of 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 her part would produce the results and damages to Plaintiff and her children herein complained of.

16. That Defendant's said acts were willful, intentional and malicious, or in the alternative, grossly negligent and she knew or should have known that her actions would produce the complained of damages to Plaintiff and 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,
