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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF CLACKAMAS

DOE,

Plaintiff,

No. CV08030693

vs.

COMPLAINT

Individuals, whose true names are unknown,
using the following pseudonyms:
TS, RONALD, KRIS, and BILL,

(DEFAMATION AND INJUNCTIVE
RELIEF)

Defendants.

NOT SUBJECT TO MANDATORY
ARBITRATION

JURY TRIAL REQUESTED

For his Complaint herein, Plaintiff Doe ("Plaintiff") alleges as follows:

1.

Plaintiff is an individual residing in Portland, Oregon.

2.

The address of Defendants is unknown.

FIRST CLAIM FOR RELIEF

(Defamation)

3.

Plaintiff realleges paragraphs 1 and 2.

4.

Plaintiff has been the subject of defamatory "blogs" posted on web-sites by
defendants who use the anonymity of internet blogs to defame plaintiff which falsely and

* * * *

1 maliciously attribute characteristics to Plaintiff that are intended to demean and embarrass
2 him and which hold him in a false light.

3 5.

4 Plaintiff has been damaged by Defendants' defamation in an amount to be
5 proved at trial.

6 **SECOND CLAIM FOR RELIEF**

7 **(Injunctive Relief)**

8 6.

9 Plaintiff realleges paragraphs 1 through 5.

10 7.

11 Unless Defendants are enjoined from posting defamatory blogs against
12 Plaintiff, Plaintiffs reputation will be further damaged.

13 WHEREFORE, Plaintiff prays for judgment against Defendants as follows:

14 1. Awarding damages to plaintiff from each Defendants in an amount to
15 be proved at trial.

16 2. Enjoining Defendants from posting untrue and defamatory blogs
17 against Plaintiff;

18 3. Awarding plaintiff's reasonable costs and fees; and

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1 4. Awarding Plaintiff such other relief that the Court deems just,
2 equitable and appropriate.

3 DATED this 27th day of March, 2008.

4 TONKON TORP LLP

5
6 By: 

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Of Attorneys for Plaintiff

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