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**DIV. J**  
**JUDGE**  
**STEPHEN J. WINDHORST**  
**24<sup>TH</sup> JUDICIAL DISTRICT COURT FOR THE PARISH OF JEFFERSON**  
**STATE OF LOUISIANA**

NUMBER: 1287-191

**PARISH OF JEFFERSON AND STEVE THERIOT**

**VERSUS**

**JOHN DOES 1 THROUGH 100,**  
**persons presently unknown to plaintiff,**  
**but whose true identities will be included in amendments**  
**hereto when those identifies are discovered**

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PARISH OF JEFFERSON, LA  
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**GOVERNMENT**

FILED: \_\_\_\_\_ DEPUTY CLERK

**PETITION**

NOW INTO COURT, through undersigned counsel come the Parish of Jefferson and Steve Theriot, plaintiffs in the above-captioned matter, and in support of their Petition, respectfully represent as follows:

I.

Plaintiff, Parish of Jefferson, is a political subdivision of the State of Louisiana.

II.

Plaintiff, Steve Theriot, is an individual of the full age of majority and a resident of the Parish of Jefferson, State of Louisiana. Mr. Theriot is currently the Interim President of the Parish of Jefferson.

III.

Defendants, John Does 1 through 100, are persons or entities whose identity is presently unknown to plaintiffs, but who will be named as defendants in this action by way of amendment to this Petition as their identifies become known to plaintiffs.

IV.

Venue is proper in the Parish of Jefferson, State of Louisiana.

V.

Defendants have systematically published messages on the Internet using the forums and blogs on Nola.com and Slabbed.wordpress.com purportedly dedicated to a discussion of Jefferson Parish and its management.

IMAGED MAY 10 2010

IMAGED MAY 07 2010

## VI.

Defendants, using anonymous screen-names, have published numerous messages containing maliciously false and defamatory statements concerning plaintiffs with the purpose of defaming plaintiffs. By way of example, some of the slanderous and defamatory statements which were published by defendants include, but are not limited to, the following: that members of Jefferson Parish Government such as Mr. Theriot are unethical and deceitful.

## VII.

Defendants' statements about plaintiffs are patently false and defamatory *per se*.

## VIII.

Defendants' statements about plaintiffs were made with malice, and a blatant, intentional disregard for the truth, and with the intent that such statements damage plaintiffs.

## IX.

As a result of the defamatory statements made by defendants about plaintiffs to the public, plaintiffs have been injured and have suffered embarrassment, loss of personal and business reputation, as well as other damages which will be proven at trial of this matter.

**COUNT 1: DEFAMATION**

## X.

Plaintiffs hereby adopt, incorporate and reallege all of the allegations made in paragraphs I – IX of their Petition.

## XI.

Defendants have intentionally and maliciously published false, defamatory words about plaintiffs to persons other than plaintiffs, which have seriously harmed plaintiffs' reputation and standing in the community. Defendants' actions give rise to an action for defamation.

WHEREFORE, plaintiffs herein, Parish of Jefferson and Steve Theriot, pray:

That after due proceedings, there be judgment herein in plaintiffs' favor and against the defendants, and that judgment be granted forthwith, for recovery of all damages which the law will allow, including, but not limited to, the following:

- (a) Damages for embarrassment and emotional suffering
- (b) Damages for loss of personal reputation;
- (c) Damages for loss of business opportunity;
- (d) Attorneys' fees incurred in bringing this action;
- (e) All costs of these proceedings; as well as,

(f) Any other relief which the law, the evidence and equity warrants and this Court is empowered to grant.

Respectfully submitted,

**PHELPS DUNBAR LLP**



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**ATTORNEYS FOR PLAINTIFFS,  
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THERIOT**

**PLEASE WITHHOLD SERVICE AT THIS TIME**