

Civil Defamation Suit
September 2002

To the Court of Leninskiy district of Krasnodar

Plaintiff: Roy Den Hollander
D.b. 09.26.1947
National passport 200315516
Issued by the national passport center 04.19.1999
Representative attorney of the legal advice office
Of Zapadnyy district of Krasnodar
S.A.Povaliy,
350062 Krasnodar
Rashpilevskaya str. 62

Defendant: Inessa Alexandrovna Shipilina
Residing: Krasnodar, Rashpilevskaya str.

Declaration of the defense of honor, dignity, business reputation and moral damage recovery

I registered my marriage with Alina Alexandrovna Shipilina on 03.11.2000, after that together with my wife I left for the USA, New York, where I resided.

As soon as I became aware that Alina describes her relationships with other men in her diary, I decided to learn the real situation and came to Krasnodar, I met people, who knew her before our wedding. I brought a divorce suit in the USA.

In the meanwhile Alina's mother, Inessa Alexandrovna Shipilina, started to spread among our common acquaintances information, damaging my honour, dignity and business reputation.

Thus, talking to Natalya Martys she said that I was a criminal, wanted by the Federal forces, she said that I had committed grave crimes. All the facts are not true and were deliberately invented by I.A.Shipilina. Besides, she told Vera Ivanovna Avanesova defamatory insinuations about my alleged criminal past and present.

Talking to Anastasiya Vasilyeva on the phone the defendant told about me as a criminal sent Anastasiya messages on the beeper, where she threatened her with punishment if Anastasiya witnessed against her. She also told Nadezhda Sanchez the things defaming my honor and dignity.

Talking with Evgeniy Kardakov on the phone Shipilina said, that I was a mentally diseased person, socially dangerous, she urged Kardakov not to talk with me.

The above-mentioned witnesses can confirm all the episodes.

The stories told about me are not real facts, they defame my dignity, honor and business reputation.

My business reputation was damaged as a result of defendant's actions. I am a licensed attorney and have a number of clients not only in the USA, but in other countries as well, including Moscow and Krasnodar. I have to explain to my partners that I am not crazy and don't have criminal past or present.

Furthermore, spreading the information, defaming my honor, dignity and business reputation the defendant brings me moral harm.

I estimate the damage caused me by the defendant as 500 hundred rubles.

On the basis of the above-mentioned and governed by the articles 151,

152, 1099-1101 of the Civil code of the Russian Federation.

I appeal:

1. to make the defendant disprove the information defaming my honor, dignity, the untrue words that I m not normal , mentally diseased person, criminal by apologizing before me.
2. To recover from the defendant the compensation for the moral damage in the sum of 500 hundred rubles.
3. To pay all the duties at her cost

Enclosure

1. the copy of the declaration
2. the papers confirming that Shipilina spread the information defaming my honor and dignity
3. papers disproving the information spread by Shipilina.

Roy Den Hollander