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**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF ORANGE  
CENTRAL JUSTICE CENTER

NOV 28 2012

ALAN CARLSON, Clerk of the Court

9 SUPERIOR COURT OF CALIFORNIA

10 COUNTY OF ORANGE — CENTRAL JUSTICE CENTER

11 SHAHEEN SADEGHI, an individual,

12 Plaintiff,

13 vs.

14 DELILAH SNELL, an individual, and  
15 DOES 1 through 25, inclusive,

16 Defendants.

CASE NO.: 30-2012  
00614531

UNLIMITED JURISDICTION

COMPLAINT FOR:

- (1) SLANDER;
- (2) *SLANDER PER SE*;
- (3) LIBEL;
- (4) *LIBEL PER SE*;
- (5) INVASION OF PRIVACY -- FALSE LIGHT;
- (6) INTENTIONAL INTERFERENCE WITH ECONOMIC PROSPECTIVE ADVANTAGE;
- (7) NEGLIGENT INTERFERENCE WITH ECONOMIC PROSPECTIVE ADVANTAGE;
- (8) VIOLATION OF CAL. BUS. & PROF. CODE SECTION 17200; AND
- (9) INJUNCTIVE RELIEF.

FILE DATE: November 28, 2012  
TRIAL DATE SET: No Date Set

**JUDGE RONALD L. BAUER**

1 Plaintiff Shaheen Sadeghi alleges as follows:

2 **PARTIES**

3 1. Plaintiff Shaheen Sadeghi ("Mr. Sadeghi" or "Plaintiff"), is an individual residing  
4 within Orange County who is the developer of alternative, green energy, and cutting edge retail  
5 centers in Orange County, California and other places within the United States.

6 2. Plaintiff alleges, on information and belief, that Defendant Delilah Snell ("Ms.  
7 Snell") is an individual residing within Orange County, California and is the owner of a store  
8 called Road Less Traveled that is located in Santa Ana, California.

9 3. Plaintiff is unaware of the true names and capacities, whether individual,  
10 corporate, associate, or otherwise, of Defendants Does 1 through 25, inclusive, which Plaintiff  
11 therefore sues by such fictitious names. Plaintiff is informed and believes and thereon alleges  
12 that each of the fictitiously named Defendants designated herein is in some manner responsible  
13 for the events and happenings herein referred to, either contractually or tortuously, and caused the  
14 damage to Plaintiff as herein alleged. Plaintiff will amend this Complaint to allege their true  
15 names and capacities when same are ascertained.

16 **JURISDICTION AND VENUE**

17 4. This Court may exercise personal jurisdiction over Defendants and venue is proper  
18 because the facts that gave rise to this Complaint occurred within Orange County. Plaintiff  
19 further alleges that Defendants do business in Orange County, California. Plaintiff further  
20 alleges, on information and belief, that Defendant Ms. Snell currently resides within Orange  
21 County, California.

22 **GENERAL FACTUAL ALLEGATIONS**

23 5. Plaintiff has spent years developing a reputation as a forward thinking, unique, and  
24 cutting edge developer of retail centers that is environmentally friendly and green. In 1994,  
25 Plaintiff developed the eco-friendly retail center known as the Lab on Bristol Street in Costa  
26 Mesa, California. In 2002, Plaintiff developed another eco-friendly retail center across the street  
27 from the Lab known as the Camp. Throughout the years, Plaintiff has spent thousands of dollars  
28 building his reputation as a developer and landlord as well as the brands of his retail centers.

1           6.     Plaintiff further alleges, on information and belief, that Plaintiff and his wife have  
2     been longstanding proponents of recycling, green living, environmentalism, fashion and the arts.  
3     Plaintiff and his wife wanted to have a "green" department store at the Camp that offered eco-  
4     friendly products with the environment and education in mind. To further their vision, in early  
5     2006, Plaintiff even engaged a consultant to create a written business plan for a "green"  
6     department store.

7           7.     Plaintiff alleges, on information and belief, that, through his retail centers the Lab  
8     and the Camp, he has developed an environment that supports small and local businesses. In fact,  
9     the name "LAB" is an acronym for "Little American Business", and the positive reputation Mr.  
10    Sadeghi's retail centers have with small businesses is essential to their success.

11          8.     Plaintiff alleges, on information and belief, that defendant Ms. Snell used to work  
12    as a server at the Gypsy Den, a tenant at the Lab. Plaintiff alleges, on information and belief, that  
13    Ms. Snell was exposed and attracted to the eco-friendly, green and artist friendly environment  
14    that Plaintiff offered at the Lab and Camp.

15          9.     In 2008, Ms. Snell was in discussions with Plaintiff relating to her potential tenancy  
16    at the Camp, an eco-friendly mall, where she would potentially have her modern living and  
17    community education shop as a tenant of the Camp. However, Ms. Snell and her shop did not  
18    become a tenant of the Camp.

19          10.    In furtherance of their business plan and in accordance with the Lab's and the  
20    Camp's eco-friendly environment, Plaintiff and his wife opened *SEED People's Market*, a  
21    "green" department store at the Camp.

22          11.    Plaintiff further alleges, on information and belief, that Ms. Snell runs a modern  
23    natural living and community education shop in Santa Ana, CA called the *Road Less Traveled*.

24          12.    Plaintiff alleges, on information and belief that Ms. Snell desires to gain marketing  
25    exposure for her natural living and community education shop even if that means defaming  
26    Plaintiff.

27          13.    Plaintiff alleges, on information and belief, that Ms. Snell is the girlfriend of the  
28    editor of the OC Weekly, Gustavo Arellano. Plaintiff alleges, on information and belief, that Ms.

1 Snell defamed Plaintiff to the *OC Weekly* by falsely and maliciously accusing Plaintiff of  
2 threatening to copy her idea of her store if she did not move into the Camp as a tenant, which is  
3 utterly false.

4 14. On December 8, 2011, *OC Weekly* published an article entitled "*Meet Shaheen*  
5 *Sadeghi, the LAB Man*". The article included multiple quotations from Ms. Snell whereby she  
6 defamed Plaintiff using false facts that never occurred and placed him in a false light. In these  
7 quotations, Ms. Snell falsely and maliciously accused Mr. Sadeghi of threatening to steal Ms.  
8 Snell's concept to develop a store that sells environmentally friendly merchandise (i.e., a "green  
9 store") during a discussion they had in 2008 unless she agreed to move her green store, *Road Less*  
10 *Traveled*, to the Camp and to pay an exorbitant rent. In Ms. Snell's own words, "He basically  
11 said to me, 'If you don't move into my center, I will copy your business.' "

12 15. Mr. Sadeghi never threatened to copy Ms. Snell's business plan if she did not  
13 relocate her business to the Camp. He had no interest in copying her business, as he had already,  
14 years prior to their discussions, developed a plan for his green store, *SEED People's Market*,  
15 which would be 40 times larger (in square footage) and have a dissimilar product line from Ms.  
16 Snell's store. *SEED People's Market's* sells mostly *Patagonia* brand apparel and other clothing  
17 and products targeted towards the outdoor and travel markets. Conversely, Ms. Snell's store  
18 focuses on books, food, and kitchen items. Ms. Snell's implied accusation that *SEED People's*  
19 *Market* is a copy of *Road Less Traveled* is demonstrably false, malicious, and egregious. Rather,  
20 she knowingly fabricated the tale for the malicious purpose of smearing his reputation and  
21 damaging his competing business to self-servingly gain free media exposure for herself and her  
22 store.

23 16. Plaintiff alleges that *SEED People's Market* is a 12,000 square foot multi-  
24 department retail operation that takes absolutely no inspiration from Ms. Snell's 300 square foot  
25 store. Mr. Sadeghi developed the plan for *SEED People's Market* in early 2006.

26 17. In her oral and/or written comments to *OC Weekly*, Ms. Snell falsely and  
27 maliciously accused Mr. Sadeghi of wanton actions for the shameless purpose of damaging Mr.  
28 Sadeghi's reputation and business, including *SEED People's Market*. Such accusations have

1 damaged Mr. Sadeghi's reputation within the community, professional environment, his family  
2 and his friends. Specifically, Ms. Snell's baseless and defamatory quotation has caused harm to  
3 Mr. Sadeghi's business and profession by falsely portraying him as a thief and bully.

4 18. Potential tenants are less likely to do business with a landlord they cannot trust,  
5 particularly if they fear he will steal their business concepts and plans if they do not agree to  
6 exorbitant lease fees. Since the publishing of Ms. Snell's false and defamatory comments,  
7 persons and potential tenants have raised concerns directly with Mr. Sadeghi.

8 19. Additionally, to his great embarrassment, Mr. Sadeghi's work associates, friends,  
9 and family have questioned him about the false accusations of Ms. Snell. Mr. Sadeghi should  
10 never have had to respond to such questions about his character, but Ms. Snell's malicious  
11 comments have required him to do so.

12 20. Ms. Snell's cruel and spiteful fabrication has devastated and damaged Mr.  
13 Sadeghi's reputation both professionally and personally and has damaged the branding of his  
14 retail centers. Mr. Sadeghi will continue to suffer these damages in the future until Ms. Snell is  
15 forced to correct her false statements.

### 16 FIRST CAUSE OF ACTION

#### 17 Slander

18 (Against all Defendants)

19 21. Plaintiff incorporates all of the allegations contained within the preceding  
20 paragraphs as if set forth in full herein.

21 22. Plaintiff alleges, on information and belief, that Defendants orally accused Mr.  
22 Sadeghi of threatening to copy Ms. Snell's business idea and plan if Ms. Snell did not move into  
23 Plaintiff's retail center.

24 23. Plaintiff alleges, on information and belief, that Defendants' oral accusations were  
25 heard by Michelle Woo who then printed Ms. Snell's slanderous comments in *OC Weekly*.

26 24. Defendants' oral accusations were slanderous because the words tend to directly  
27 injure Mr. Sadeghi's reputation.

28 25. Plaintiff alleges, on information and belief, that Defendants' accusations were

1 false.

2 26. As a result of Defendants' slanderous comments, Plaintiff has suffered general  
 3 damages to his reputation, and special damages, including, but not limited to, past and future lost  
 4 profits, damage to goodwill, and reduced property and business value. The exact amount of these  
 5 damages will be ascertained according to proof, but is believed to be in excess of the  
 6 jurisdictional minimum.

7 27. Plaintiff further alleges, on information and belief, that Defendants' wrongful  
 8 conduct was a substantial factor in causing Plaintiff's harm.

9 28. Plaintiff is informed and believes, and based thereon alleges, that Defendants  
 10 pursued the aforesaid course of tortious and wrongful conduct intentionally, maliciously and  
 11 oppressively and with a conscious and reckless disregard of the rights of Plaintiff. Therefore,  
 12 Plaintiff additionally seeks punitive and exemplary damages against Defendants in an amount  
 13 sufficient to punish and deter similar future conduct.

14 **SECOND CAUSE OF ACTION**

15 ***Slander Per Se***

16 (Against all Defendants)

17 29. Plaintiff incorporates all of the allegations contained within the preceding  
 18 paragraphs as if set forth in full herein.

19 30. Plaintiff alleges, on information and belief, that Defendants orally accused Mr.  
 20 Sadeghi of threatening to copy Ms. Snell's business idea and plan if Ms. Snell did not move into  
 21 Plaintiff's retail center.

22 31. Plaintiff alleges, on information and belief, that Defendants' oral accusations were  
 23 heard by Michelle Woo who then printed the comments in *OC Weekly*.

24 32. Defendants' oral accusations were slanderous per se because, on their face, the  
 25 words tend to directly injure Mr. Sadeghi in his business and/or profession. Accusing Mr.  
 26 Sadeghi of stealing the ideas of his potential customers has the natural tendency of lessening his  
 27 business' profits.

28 33. Plaintiff alleges, on information and belief, that Defendants' accusations were

1 false.

2 34. As a result of Defendants' slanderous comments, Plaintiff has suffered general  
3 damages to his reputation, and special damages, including, but not limited to, past and future lost  
4 profits, damage to goodwill, and reduced property and business value. The exact amount of these  
5 damages will be ascertained according to proof, but is believed to be in excess of the  
6 jurisdictional minimum.

7 35. Plaintiff further alleges, on information and belief, that Defendants' wrongful  
8 conduct was a substantial factor in causing Plaintiff's harm.

9 36. Plaintiff is informed and believes, and based thereon alleges, that Defendants  
10 pursued the aforesaid course of tortious and wrongful conduct intentionally, maliciously and  
11 oppressively and with a conscious and reckless disregard of the rights of Plaintiff. Therefore,  
12 Plaintiff additionally seeks punitive and exemplary damages against Defendants in an amount  
13 sufficient to punish and deter similar future conduct.

14 **THIRD CAUSE OF ACTION**

15 **Libel**

16 (Against all Defendants)

17 37. Plaintiff incorporates all of the allegations contained within the preceding  
18 paragraphs as if set forth in full herein.

19 38. Plaintiff alleges, on information and belief, that Defendants accused Mr. Sadeghi,  
20 in writing, of threatening to copy Ms. Snell's business idea and plan if Ms. Snell did not move  
21 into Plaintiff's retail center.

22 39. Plaintiff alleges, on information and belief, that Defendants' written accusations  
23 were read by Michelle Woo and several other persons whose names are not known to Plaintiff  
24 given Ms. Woo, as a reporter for *OC Weekly*, printed Ms. Snell's defamatory comments.

25 40. Defendants' written accusations were libelous because the words tend to directly  
26 injure Mr. Sadeghi in his occupation.

27 41. Plaintiff alleges, on information and belief, that Defendants' accusations were  
28 false.

1           42.    As a result of Defendants' libelous comments, Plaintiff has suffered general  
2 damages to his reputation, and special damages, including, but not limited to, past and future lost  
3 profits, damage to goodwill, and reduced property and business value. The exact amount of these  
4 damages will be ascertained according to proof, but is believed to be in excess of the  
5 jurisdictional minimum..

6           43.    Plaintiff further alleges, on information and belief, that Defendants' wrongful  
7 conduct was a substantial factor in causing Plaintiff's harm.

8           44.    Plaintiff is informed and believes, and based thereon alleges, that Defendants  
9 pursued the aforesaid course of tortious and wrongful conduct intentionally, maliciously and  
10 oppressively and with a conscious and reckless disregard of the rights of Plaintiff. Therefore,  
11 Plaintiff additionally seeks punitive and exemplary damages against Defendants in an amount  
12 sufficient to punish and deter similar future conduct.

13   **FOURTH CAUSE OF ACTION**

14   *Libel Per Se*

15   (Against all Defendants)

16           45.    Plaintiff incorporates all of the allegations contained within the preceding  
17 paragraphs as if set forth in full herein.

18           46.    Plaintiff alleges, on information and belief, that Defendants accused Mr. Sadeghi,  
19 in writing, of threatening to copy Ms. Snell's business idea and plan if Ms. Snell did not move  
20 into Plaintiff's retail center.

21           47.    Plaintiff alleges, on information and belief, that Defendants' written accusations  
22 were read by Michelle Woo and several other persons whose names are not known to Plaintiff  
23 given Ms. Woo, as a reporter for *OC Weekly*, printed Ms. Snell's defamatory comments.

24           48.    Defendants' written accusations were libelous per se because, on their face, the  
25 words tend to directly injure Mr. Sadeghi in his occupation.

26           49.    Plaintiff alleges, on information and belief, that Defendants' accusations were  
27 false.

28           50.    As a result of Defendants' libelous comments, Plaintiff has suffered general



1 damages to his reputation, and special damages, including, but not limited to, lost profits from  
2 reduced business, damage to goodwill, and reduced property and business value. The exact  
3 amount of these damages will be ascertained according to proof, but is believed to be in excess of  
4 the jurisdictional minimum.

5 51. Plaintiff further alleges, on information and belief, that Defendants' wrongful  
6 conduct was a substantial factor in causing Plaintiff's harm.

7 52. Plaintiff is informed and believes, and based thereon alleges, that Defendants  
8 pursued the aforesaid course of tortious and wrongful conduct intentionally, maliciously and  
9 oppressively and with a conscious and reckless disregard of the rights of Plaintiff. Therefore,  
10 Plaintiff additionally seeks punitive and exemplary damages against Defendants in an amount  
11 sufficient to punish and deter similar future conduct.

12 **FIFTH CAUSE OF ACTION**

13 **Invasion of Privacy - False Light**

14 (Against all Defendants)

15 53. Plaintiff incorporates all of the allegations contained within the preceding  
16 paragraphs as if set forth in full herein.

17 54. Plaintiff alleges, on information and belief, that Defendants accused Mr. Sadeghi  
18 of threatening to copy Ms. Snell's business idea and plan if Ms. Snell did not move into  
19 Plaintiff's retail center.

20 55. Plaintiff alleges, on information and belief, that Defendant conveyed her  
21 accusations to Michelle Woo with the understanding they would be published a story Ms. Woo  
22 was writing for *OC Weekly*.

23 56. Plaintiff alleges, on information and belief, that Defendants intended their words to  
24 be disclosed publicly, which they were in the *OC Weekly*.

25 57. Defendants' oral and/or written accusations invaded Plaintiff's privacy because the  
26 words tend to directly injure Mr. Sadeghi in his occupation.

27 58. Plaintiff alleges, on information and belief, that Defendants' accusations were  
28 false.

1           59.    As a result of Defendants' false comments, Plaintiff has suffered general damages  
2 to his reputation, and special damages, including, but not limited to, past and future lost profits,  
3 damage to goodwill, and reduced property and business value. The exact amount of these  
4 damages will be ascertained according to proof, but is believed to be in excess of the  
5 jurisdictional minimum.

6           60.    Plaintiff further alleges, on information and belief, that Defendants' wrongful  
7 conduct was a substantial factor in causing Plaintiff's harm.

8           61.    Plaintiff is informed and believes, and based thereon alleges, that Defendants  
9 pursued the aforesaid course of tortious and wrongful conduct intentionally, maliciously and  
10 oppressively and with a conscious and reckless disregard of the rights of Plaintiff. Therefore,  
11 Plaintiff additionally seeks punitive and exemplary damages against Defendants in an amount  
12 sufficient to punish and deter similar future conduct.

### 13                                   **SIXTH CAUSE OF ACTION**

#### 14                                   **Intentional Interference with Economic Prospective Advantage**

15                                   **(Against all Defendants)**

16           62.    Plaintiff incorporates all of the allegations contained within the preceding  
17 paragraphs as if set forth in full herein.

18           63.    Plaintiff is informed and believes, and based thereon alleges, that at all relevant  
19 times, Plaintiff was in an economic relationship with his customers and potential customers that  
20 probably would have resulted in an economic benefit to Plaintiff.

21           64.    Plaintiff alleges, on information and belief, that Defendants knew of Plaintiff's  
22 relationship with his customers and potential customers at all relevant times.

23           65.    Plaintiff is informed and believes, and based thereon alleges, that Defendants knew  
24 or should have known that Plaintiff's relationship with his customers and potential customers  
25 would be disrupted if Defendants did not act with reasonable care.

26           66.    Plaintiff alleges, on information and belief, that Defendants engaged in acts of  
27 slander, libel, and invasion of privacy that constitute independently actionable unlawful conduct  
28 in furtherance of Defendants' unlawful interference.



1           75.     Plaintiff alleges, on information and belief, that Defendants engaged in acts of  
2 slander, libel, and invasion of privacy that constitute independently actionable unlawful conduct  
3 in furtherance of Defendants' unlawful interference.

4           76.     Plaintiff is informed and believes, and based thereon alleges, that as a consequence  
5 of Defendants' interference with Plaintiff's relationship with his customers and potential  
6 customers, Plaintiff's relationships with his customers and potential customers has been disrupted  
7 and Plaintiff has suffered damages, including, but not limited to, lost profits, damage to goodwill,  
8 reduced property and business value, and other damages.

9           77.     As a result of Defendants' wrongful acts of interference, Plaintiff has suffered  
10 damages, the exact amount to be ascertained according to proof, but is believed to be in excess of  
11 the jurisdictional minimum.

12           78.     Plaintiff further alleges, on information and belief, that Defendants' wrongful  
13 conduct was a substantial factor in causing Plaintiff's harm.

14                                   **EIGHTH CAUSE OF ACTION**

15                                   **For Unfair Competition - Business & Professions Code Section 17200**

16    (Against all Defendants)

17           79.     Plaintiff incorporates all of the allegations contained within the preceding  
18 paragraphs as if set forth in full herein.

19           80.     On information and belief, Plaintiff alleges that Defendants have engaged in  
20 fraudulent, deceptive, unlawful, and unfair business practices.

21           81.     Plaintiff alleges, on information and belief, that the conduct alleged above by  
22 Defendants amounts to an unfair business practice within the scope of California's Unfair  
23 Competition Law, codified in Business & Professions Code, section 17200 et seq., and violates  
24 statutes and policies, including, but not limited to, Civil Code sections 44, 45, and 46 and  
25 common law invasion of privacy by placing Mr. Sadeghi in false light in the public eye.

26           82.     Plaintiff further requests such equitable relief as the court deems appropriate.  
27 including, including, but not limited to, restitution, preliminary and permanent injunctive relief.

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**NINTH CAUSE OF ACTION**

**Injunctive Relief**

(Against all Defendants)

83. Plaintiff incorporates all of the allegations contained within the preceding paragraphs as if set forth in full herein.

84. Plaintiff is informed and believes, and thereon alleges that Defendants should be preliminarily and permanently enjoined from further defaming Plaintiff by falsely accusing him of copying her business idea and plan.

85. Plaintiff seeks a preliminary and permanent injunction requiring that Defendants issue a public retraction of their comments to undo the harm caused by Defendants' false words.

86. Defendants' wrongful conduct, unless and until enjoined and restrained by order of this Court, will cause great and irreparable injury to Plaintiff.

87. Plaintiff alleges, on information and belief, that he has no adequate remedy at law for the injuries Defendants' comments are causing him.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff prays for judgment against Defendants, and each of them, as follows:

**FIRST CAUSE OF ACTION**

- 1. For compensatory damages in excess of the jurisdictional minimum according to proof;
- 2. For pre-judgment and post-judgment interest accrued thereon at the maximum legal rate thereon;
- 3. For punitive or exemplary damages according to proof;
- 4. For costs; and
- 5. For a trial by jury.

**SECOND CAUSE OF ACTION**

- 6. For compensatory damages in excess of the jurisdictional minimum according to

1 proof;

2 7. For pre-judgment and post-judgment interest accrued thereon at the maximum  
3 legal rate thereon;

4 8. For punitive or exemplary damages according to proof;

5 9. For costs; and

6 10. For a trial by jury.

7 **THIRD CAUSE OF ACTION**

8 11. For compensatory damages in excess of the jurisdictional minimum according to  
9 proof;

10 12. For pre-judgment and post-judgment interest accrued thereon at the maximum  
11 legal rate thereon;

12 13. For punitive or exemplary damages according to proof;

13 14. For costs; and

14 15. For a trial by jury.

15 **FOURTH CAUSE OF ACTION**

16 16. For compensatory damages in excess of the jurisdictional minimum according to  
17 proof;

18 17. For pre-judgment and post-judgment interest accrued thereon at the maximum  
19 legal rate thereon;

20 18. For punitive or exemplary damages according to proof;

21 19. For costs; and

22 20. For a trial by jury.

23 **FIFTH CAUSES OF ACTION**

24 21. For compensatory damages in excess of the jurisdictional minimum according to  
25 proof;

26 22. For pre-judgment and post-judgment interest accrued thereon at the maximum  
27 legal rate thereon;

28 23. For punitive or exemplary damages according to proof;

- 1            24.    For costs; and
- 2            25.    For a trial by jury.

**SIXTH CAUSE OF ACTION**

- 4            26.    For compensatory damages in excess of the jurisdictional minimum according to
- 5 proof;
- 6            27.    For pre-judgment and post-judgment interest accrued thereon at the maximum
- 7 legal rate thereon;
- 8            28.    For punitive damages according to proof;
- 9            29.    For costs; and
- 10          30.    For a trial by jury.

**SEVENTH CAUSE OF ACTION**

- 12          31.    For compensatory damages in excess of the jurisdictional minimum according to
- 13 proof;
- 14          32.    For pre-judgment and post-judgment interest accrued thereon at the maximum
- 15 legal rate thereon;
- 16          33.    For costs; and
- 17          34.    For a trial by jury.

**EIGHTH CAUSE OF ACTION**

- 19          35.    For a preliminary and permanent injunction requiring Defendants to refrain from
- 20 defaming Plaintiff and placing him in a false light by, among other things, falsely claiming that he
- 21 threatened to copy her business idea and plan if she did not move into his retail center.
- 22          36.    For such other equitable relief as the court deems proper.

**NINTH CAUSE OF ACTION**

- 24          37.    For a preliminary and permanent injunction requiring Defendants to refrain from
- 25 defaming Plaintiff and placing him in a false light by, among other things, falsely claiming that he
- 26 threatened to copy her business idea and plan if she did not move into his retail center. Plaintiff
- 27 seeks a preliminary and permanent injunction requiring that Defendants issue a public retraction
- 28 of their comments to undo the harm caused by Defendants' false words.

ON ALL CAUSES OF ACTION

- 38. For pre-judgment interest;
- 39. For costs and attorneys' fees; and
- 40. For such other relief as the Court deems proper.

Dated: November 28, 2012

NEWMAYER & DILLION LLP

By: 

John E. Bowerbank  
Jack M. Rubin  
Attorneys for Plaintiff  
SHAHEEN SADEGHI

NEWMAYER & DILLION LLP

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