

VI. THIRD CLAIM FOR RELIEF
(Negligence)

45. Paragraphs 1 through 44 above are repeated as if they were restated herein verbatim.

46. Defendants owed a duty to the Plaintiffs accurately to vet, investigate and publish only truthful and non-libelous statements.

47. By failing or refusing to investigate accurately the stories written by Marvin concerning unlawful and libelous conduct by Plaintiffs, Defendants breached their duty to the Plaintiffs.

48. Defendants, their employees, agents, management, investigators, and editors were negligent, grossly negligent, malicious, reckless, careless, willful, and wanton in the following particulars:

(a) In failing to attempt to contact and/or contacting the Plaintiffs, the ultimate source;

(b) In failing fully to investigate any and all documents which may support the claims made by the Defendant Marvin, and

(c) In failing to take any and all steps necessary to corroborate the statements concerning Plaintiffs as made by Defendant Marvin.

49. As a direct and proximate cause of the negligence of the Defendants these Plaintiffs have suffered damages in amounts in excess of \$100,000 each..

WHEREFORE, Plaintiffs pray that this Court:

1. inquire into the matters set forth herein;
2. grant each of them judgments for damages against all Defendants, jointly and severally, for each claim for relief sought herein in amounts in excess of \$100,000 each as compensatory damages;
3. allow a jury to award punitive damages in favor of Plaintiffs in amounts to be determined by the jury, against all Defendants, jointly and severally'