

RETURN DATE: MARCH 21, 2023

SUPERIOR COURT

P2B NEW HAVEN, LLC
DBA THE PLACE TO BE

J.D OF NEW HAVEN

AT NEW HAVEN

V.

FEBRUARY 16, 2023

JOANE JEAN BAPTISTE

COMPLAINT

1. The Plaintiff, P2B NEW HAVEN, LLC DBA “The Place to be”, (hereinafter referred to as “Plaintiff”) is a restaurant located in New Haven, Connecticut.

2. The Defendant, Joane Jean Baptiste, was a patron at Plaintiff’s restaurant on or about January 14, 2023.

3. On or about January 14, 2023 at 6:52 p.m., the Defendant posted on her Facebook social media account the following message: “The owner was very rude! It was a group of us waiting off on the side and she said “you guys can’t stand there you can either move or go shopping or something while you wait”. “Keep in mind she only said that to the group of black paying customers.”

4. Defendant's statements as alleged above were false, defamatory and malicious and tend to place the Plaintiff in a negative light, and more specifically, Defendant’s comments suggest that Plaintiff is a racist.

5. Defendant's statements as alleged above have in fact caused damages to the Plaintiff.

COUNT ONE (DEFAMATION)

1-5. Paragraphs 1-5 are hereby incorporated into Paragraphs 1-5 of this Count One, as if fully set forth herein.

6. The Defendant engaged in defamation of the Plaintiff, all to the Plaintiff's loss and damage.

COUNT TWO (LIBEL PER SE)

1-5. Paragraphs 1-5 are hereby incorporated into Paragraphs 1-5 of this Count Two, as if fully set forth herein.

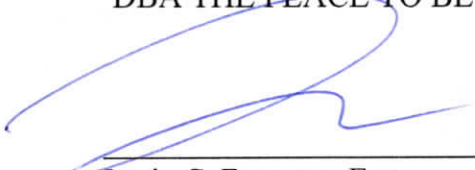
6. The Defendant engaged in libel per se as to the Plaintiff, in that the Defendant's false, defamatory and malicious statements accuse the Plaintiff of being a racist, all to the Plaintiff's loss and damage.

WHEREFORE, Plaintiff claims:

1. Monetary Damages;
2. Attorney's fees;
3. Punitive damages;
4. Costs; and
5. Such other legal and equitable relief as the court deems just and

proper.

PLAINTIFF,
P2B NEW HAVEN, LLC
DBA THE PLACE TO BE



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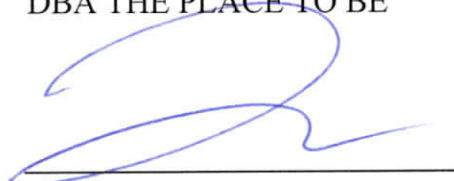
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STATEMENT OF AMOUNT IN DEMAND

The amount in demand is greater than Fifteen Thousand Dollars
(\$15,000.00) exclusive of interest and costs.

PLAINTIFF,
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DBA THE PLACE TO BE



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