SUPERICR COURT OF THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA 2022 MAR 22 PM 5: 52 CIVIL DIVISION FILED CIVIL ACTIONS BRANCH MAR 2 2 2022 ior Gana Vincent Bernard Orange Sr., 202-486-3201 2022 CA 001258  $\mathbb{R}$ Plaintiff C.A. No. : 2020 CA 1540 Taylor St NE Washington, DC 20017 No48 & Gol. com Judge Hon. Next Event:

Washington Business Journal 1555 Wilson Blvd Unit 400 Arlington, VA 22209

Alex Koma 1555 Wilson Blvd Unit 400 Arlington, VA 22209

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### **COMPLAINT**

The Plaintiff files this Complaint for defamation, false light, and intentional infliction of emotional distress, and alleges as follows:

### **INTRODUCTION**

Defendants have unlawfully published and/or republished defamatory falsehoods, made with knowledge of its falsity and/or with reckless disregard for the truth. Plaintiff, Vincent

Bernard Orange, Sr. is a public figure based on his many years of achievement in the handling of public affairs as a District of Columbia Councilmember, Democratic National Committeeman, Attorney, Certified Public Accountant, President and CEO of a business membership organization and other positions, who shall prove the defamations occurred knowingly false or with reckless disregard for the truth, under a clear and convincing standard for the named defendants. The publications of this knowingly false information are 'extreme and outrageous' conduct on the part of the Defendants, which intentionally or recklessly caused Vincent B. Orange Sr.'s severe emotional distress, unsettling of his workplace environment and employment opportunities, severely damaged his reputation, impacted his family while exacerbating the emotional distress to be able to make a living and support his family. This action seeks to remedy Defendants' unlawful conduct.

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#### PARTIES AND JURISDICTION

- Plaintiff is Vincent Bernard Orange, Sr., a forty-two-year resident and citizen of Washington, D.C. residing at 1540 Taylor Street, NE, Washington, D.C. 20017.
- First named Defendant is the Washington Business Journal located at 1555 Wilson Blvd., Unit 400, Arlington, Virginia 22209, doing business in Washington, D.C. and the Washington Region.
- Second named Defendant is Alex Koma who was a staff reporter and employee for the Washington Business Journal and the author of the Washington Business Journal defamatory offenses on Plaintiff Vincent Bernard Orange, Sr.
- 4. This Court has personal jurisdiction over the Defendants,

### FACTUAL BACKGROUND

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- 5. Vincent Bernard Orange, Sr. is a forty-two-year resident and citizen of the District of Columbia, an attorney and certified public accountant, former elected District of Columbia official and former President and Chief Executive Officer of the District of Columbia Chamber of Commerce.
- 6. The Washington Business Journal is the leading source for business news and data for the Washington, D.C. region and features local business news about the Washington, D.C. Region. The Washington Business Journal paid circulation business-to-business weekly newspaper is read by 60,000 Washington-area business executives. The Washington Business Journal also provides tools to help businesses grow, network and hire. The Washington Business Journal's parent company is American City Business Journals.
- 7. Alex Koma was a Staff Reporter and employee of the Washington Business Journal for three years where he wrote defamatory articles on Vincent Bernard Orange, Sr., and in the year 2022 join the staff of Washington City Paper as the Loose Lips Reporter.
- 8. On February 12, 2020, Washington Business Journal and Alex Koma authored and published an article entitled "Vincent Orange says the D.C. Chamber is financially strong. His lawyers say the opposite". The article stated amongst other things that the DC Chamber under Vincent Orange show a persistent slide in its fortunes in the last several years. The article states the chamber's own financial documents hint at other potential problems facing the organization since August 2016, when Orange took over the top job. The article states while Orange was an at-large councilmember he accepted the

chamber's top job and initially opted to hold both posts simultaneously until eventually resigning from the council under pressure from ethics groups.

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- 9. Vincent Orange contacted the leadership at the Washington Business Journal who decided to publish on February 21, 2020, Vincent Orange's Letter to the Editor entitled: D.C. Chamber is on a positive trajectory". Vincent Orange asserted that "[a]ccording to the Washington Business Journal's 2020 Book of Lists, the D.C. Chamber is the No. 2 ranked chamber in Greater Washington after ranking fourth in 2017, 2018, and 2019. The chamber's strong revenue performance in 2019 of nearly \$3.2 million may produce the No. 1 ranking".
- 10. Although the Washington Business Journal published Vincent Orange's Letter to the Editor, it enhanced and re-published Alex Koma's February 12, 2020, article containing falsehoods, misleading statements and continued to place Vincent Orange in a false light.
- 11. The Washington Business Journal and its staff reporter, Alex Koma, disregarded the article written by its staff reporter, Andrea Cwieka, on September 5, 2017, entitled "One year in, D.C. Chamber's Vincent Orange hopes for turnaround". Andrea Cwieka states "Vincent Orange, who took over the D.C. Chamber one year ago, wants to boost chamber revenue to \$3 million in three years. . .. Orange hopes to turn around the organization's trajectory after a turbulent few years, when Harry Wingo served in the post for just 18 months."
- 12. On March 22, 2021, and updated on March 23, 2021, the Washington Business Journal and Alex Koma published an article entitled "Angela Franco will stay on as permanent head of the D.C. Chamber. Here's what she says about her plans." The article states amongst other things that Angela Franco will stay on as permanent head of the D.C.

Chamber of Commerce .... [b]ut before [Orange's] sudden departure, the [chamber] was on some rocky financial footing, telling a D.C. court this summer that an ongoing legal dispute threatened its ability to do business. A variety of prominent financial backers also abandoned the chamber during Orange's tenure, according to internal documents the Washington Business Journal obtained last year." The article provided a link to the internal documents which turned out to be a link to the February 12, 2020, article entitled "Vincent Orange says the D.C. Chamber is financially strong. His lawyer says opposite."

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13. The documented record for Vincent Orange under his leadership is the chamber has closed each calendar year of 2016, 2017, 2018, and 2019 with a net positive increase in assets totaling in excess of \$317,000 and has generated nearly \$11 million in revenue, acquired a new 7,100 square -foot headquarters, obtained 306 new members, maintained 22 circle partners and has not had to utilize the line of credit in three years. In addition, chamber advocacy has resulted in lowering the D.C. corporate franchise tax from 9.75% to 8.25%, increasing the D.C. estate tax exemption from \$2 million to \$5 million, achieving a commitment to pay off the bonds on Nationals Stadium 10 years early, eliminating the \$600 million carbon emission tax legislative proposal, and tabling the D.C. False Claims Act. The chamber has published annual State of the Business reports on "Building a Competitive City" (2019), "Towards A More Inclusive Economy" (2018), and "Twenty Years of Change Since the Revitalization Act" (2017).

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14. The Washington Business Journal failed to mention that Vincent Orange was an At-Large Councilmember from April 2011 to August 2016, which were the D.C. Chamber's turbulent years, and Vincent Orange was on hired on August 16, 2016, to manage the chamber's seven employees and turn around the chamber's trajectory.

15. The Washington Business Journal and Alex Koma focused on a lawsuit against the chamber and a demand for legal fees of \$79,000. The lawsuit is a result of activity prior to Vincent Orange joining the DC Chamber. However, Vincent Orange had to manage the lawsuit and denied payment of the \$79,000. The Chamber's account was attached for the \$79,000. Vincent Orange argued the case and the \$79,000 was placed in escrow. The DC Court of Appeals returned the \$79,000 to the DC Chamber with interest. The Washington Business Journal and Alex Koma never reported to its readership this revelation.

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- 16. Upon Vincent Orange's departure from the DC Chamber on June 30, 2020, Vincent Orange received this message on July 1, 2020, from the Office Managing Partner of CohnReznick and the Treasurer of the D.C. Chamber of Commerce stating "Hey Vince . . . . [y]ou were just what we needed to get back on track and we're in a much better place because of you. You were instrumental in turning the Chamber around and a tremendous leader and role model for the business community- please accept my thanks and gratitude. Personally, I'm honored to have had the opportunity to be on your team. It's been a pleasure to have a front row seat to witness your leadership ...."
- 17. The Washington Business Journal called for Vincent Orange's resignation as the At-Large Councilmember on the DC Council because Orange accepted the job as President and CEO of the DC Chamber of Commerce calling it a conflict of interest. Alex Koma, the Washington Business Journal Staff Reporter published these sentiments as well.
- 18. The DC Board of Ethics and Government Accountability issued opinions and/or letters dated September 26, 2016, August 3, 2017, and September 7, 2017, indicating Vincent

Orange did not have a conflict of interest. The Washington Business Journal and Alex Koma have not published these revelations to its readership.

19. Defendants, Washington Business Journal and Alex Koma, have engaged in defamation against Plaintiff Vincent Bernard Orange, Sr. with actual malice and reckless disregard of the truth. Defendants have unlawfully published and/or republished defamatory falsehoods with knowledge of its falsity and/or with reckless disregard for the truth.

### **COUNT I: DEFAMATION WASHINGTON BUSINESS JOURNAL**

20. Plaintiff realleges all preceding paragraphs for this count.

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- 21. Defendant published and/or republished false statements regarding Plaintiff's performance as President and Chief Executive Officer of the D.C. Chamber of Commerce. The Defendant had the truth at its disposal but ignored it to the detriment of Plaintiff's reputation and character.
- 22. Defendant published and republished false statements regarding Plaintiff's conflict of interest in being an At-Large Councilmember and President and Chief Executive Officer of the Chamber of Commerce. The Defendant had the truth at its disposal but ignored it to the detriment of the Plaintiff's reputation and character.
- 23. But for the Defendants' publish and/or republish of defamation, the Plaintiff would not have been defamed.
- 24. These acts, comments and/or publications were made with actual malice as they were contrary to the known truth or the discovery of the truth at Defendant's disposal.
- 25. Therefore, the Defendant knowingly published this information with knowledge of its falsehood which proves the actual malice required.

- 26. The publications caused harm to the Plaintiff. It diminished and demeaned his character which adversely affects his ability for employment opportunities, appointments and elections, and the Defendant sought to cause this harm.
- 27. But for these acts by the Defendant, the Plaintiff would not have suffered the harm of having his credibility diminished which has now been jeopardized in the present and future due to these continued acts that have monetary impact.

### **COUNT II: DEFAMATION ALEX KOMA**

28. Plaintiff realleges all preceding paragraphs for this count.

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- 29. Defendant published and/or republished false statements regarding Plaintiff's performance as President and Chief Executive Officer of the D.C. Chamber of Commerce. The Defendant had the truth at its disposal but ignored it to the detriment of Plaintiff's reputation and character.
- 30. Defendant published and republished false statements regarding Plaintiff's conflict of interest in being an At-Large Councilmember and President and Chief Executive Officer of the Chamber of Commerce. The Defendant had the truth at its disposal but ignored it to the detriment of the Plaintiff's reputation and character.
- 31. But for the Defendants publish and/or republish of defamation, the Plaintiff would not have been defamed.
- 32. These acts, comments and/or publications were made with actual malice as they were contrary to the known truth or the discovery of the truth at Defendant's disposal.

- 33. Therefore, the Defendant knowingly published this information with knowledge of its falsehood which proves the actual malice required.
- 34. The publications caused harm to the Plaintiff. It diminished and demeaned his character which adversely affects his ability for employment opportunities, appointments and elections, and the Defendant sought to cause this harm.
- 35. But for these acts by the Defendant, the Plaintiff would not have suffered the harm of having his credibility diminished which has now been jeopardized in the present and future due to these continued acts that have monetary impact.

### COUNT III: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS AS TO ALL DEFENDANTS

- 36. Plaintiff realleges all preceding paragraphs for this count as the Defendants are jointly and severally liable for their actions for intentional infliction of emotional distress arising out of the same knowingly false statements published to its readership.
- 37. Defendant published and/or republished false statements regarding Plaintiff's performance as President and Chief Executive Officer of the D.C. Chamber of Commerce inflicted intentional emotional distress upon the Plaintiff. The Defendant had the truth at its disposal but ignored it to the detriment of Plaintiff's reputation, character and well-being. This action was intentional with malice by the Defendants which resulted in emotional distress.
- 38. Defendant published and republished false statements regarding Plaintiff's conflict of interest in being an At-Large Councilmember and President and Chief Executive Officer of the Chamber of Commerce. The Defendant had the truth at its disposal but ignored it

to the detriment of the Plaintiff's reputation and character. This action was intentional with malice by the Defendants which resulted in emotional distress.

- 39. But for the Defendants publish and/or republish of defamation, the Plaintiff would not have been defamed.
- 40. These acts, comments and/or publications were made with actual malice as they were made contrary to the truth and the discovery of the truth at Defendants disposal.
- 41. Therefore, the Defendant knowingly published this information with knowledge of its falsehood which proves the actual malice required.
- 42. The publications caused harm to the Plaintiff. It diminished and demeaned his character which adversely affects his ability for employment opportunities, appointments and elections, and the Defendant intentionally sought to cause this harm.
- 43. But for these acts by the Defendants, the Plaintiff would not have suffered the harm of having his credibility diminished which has now been jeopardized in the present and future due to these continued acts that have monetary impact.

**WHEREFORE**, the Plaintiff prays this Court award him, an order declaring Plaintiff was harmed by Defendants' unlawful conduct; the monetary damages of not less than twenty-five million dollars (\$25,000,000 USD), with joint and several liability of the Defendants, to be proven at trial; all reasonable attorney's fees and cost associated with this action; and any further relief this Court may deem just. A JURY TRIAL IS REQUESTED.

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**Respectfully Submitted**,

Vincent Bernard Orange Sr DC Bar 375959 Vincent Orange Esquire 1540 Taylor Street, NE Washington, D.C. 20017

### **CERTIFICATE OF SERVICE**

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I hereby certify that this day, the 22<sup>nd</sup> of March 2022, the foregoing Complaint was filed in DC Superior Court, and service is pending of the parties.

Vincent Bernard Orange Sr. (Bar No. 375959)

	SUPERIOR COURT C	OF THE DISTRICT O	Form CX101-A Unsworn Declaration Supplement
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Washington	Busines, Jown	na	Case No: <u>2022 A 001258</u> B
Alex Lorn Supplem document.	Busines Sowr Defendants) nents (list title of pleading, mot	tion, or other document)	and is being filed along with that
(a) If Executed Insie	de the United States:		
l declare (ce Executed or	ertify, verify, or state) under 24 day of Mgch (date) (month)	penalty of perjury that 2022 (year)	the foregoing is true and correct.
Printed Nam Signature	Con ORANG		
Washing	nston DC. te, or Other Location	202 - L Phone Number	186-320
See D.C. Code § 22-	-2402 (a)(3) (2010).		
(b) If Executed Outs	ide the United States:		
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. . .

I declare under penalty of perjury under the law of the District of Columbia that the foregoing is true and correct, and that I am physically located outside the geographic boundaries of the United States, Puerto Rico, the United States Virgin Islands, and any territory or insular possession subject to the jurisdiction of the United States. Executed on \_\_\_\_\_\_ day of \_\_\_\_\_\_\_, (month) (year)

(year) at \_ (city or other locations, and state) (country) Printed Name Signature Phone Number

See D.C. CODE § 16-5306 (2010).

Note: This form may be attached to any document to be used in place of sworn written declarations, verifications, certificates, statements, oaths, or affidavits unless otherwise provided by law; for example, this form may not be used to supplement a verified complaint in the Landlord and Tenant Branch or Small Claims Branch. See D.C. Code §§ 16-1501, 3902 (2001).

# Superior Court of the District of Columbia

CIV	IL DIVISION- CIVIL ACTION	IS BRANCH
	INFORMATION SHEE	
Vincent Orange	<u>SR</u> Case Number:	2022 CA 001258 B
vs	Date:	
Washington Busin	NSJ Journel One of th	e defendants is being sued
Alox Koma	in their of	fficial capacity.
Name: (Please Print)	Nacal	Relationship to Lawsuit
Firm Nathe:		Attorney for Plaintiff
Vincent Or	<u>angl</u>	Self (Pro Se)
Telephone No.: 202-486-3201	tit Unified Bar No.: 375959	• Other:
TYPE OF CASE: $\Box$ Non-Jury Demand: $\frac{25}{00}, 0$	00 6 Person Jury Other	12 Person Jury
PENDING CASE(S) RELATED TO	O THE ACTION BEING FILED	
Case No.:	Judge:	Calendar #:
Case No.:	Judge:	Calendar#:
NATURE OF SUIT: (Check O	ne Box Only)	
A. CONTRACTS	COLLECTION CASES	8
<ul> <li>01 Breach of Contract</li> <li>02 Breach of Warranty</li> <li>06 Negotiable Instrument</li> <li>07 Personal Property</li> <li>13 Employment Discrimination</li> <li>15 Special Education Fees</li> </ul>		34 Insurance/Subrogation     Under \$25,000 Consent Denied
<b>B. PROPERTY TORTS</b>		
<ul> <li>01 Automobile</li> <li>02 Conversion</li> <li>07 Shoplifting, D.C. Code § 27-1</li> </ul>	O3 Destruction of Private Property     O4 Property Damage     02 (a)	y 🔲 05 Trespass
C. PERSONAL TORTS		
<ul> <li>01 Abuse of Process</li> <li>02 Alienation of Affection</li> <li>03 Assault and Battery</li> <li>04 Automobile- Personal Injury</li> <li>05 Deceit (Misrepresentation)</li> <li>06 False Accusation</li> <li>07 False Arrest</li> <li>08 Fraud</li> </ul>	<ul> <li>10 Invasion of Privacy</li> <li>11 Libel and Slander</li> <li>12 Malicious Interference</li> <li>13 Malicious Prosecution</li> <li>14 Malpractice Legal</li> <li>15 Malpractice Medical (Including Wrongful D)</li> <li>16 Negligence- (Not Automobile, Not Malpractice)</li> </ul>	<ul> <li>17 Personal Injury- (Not Automobile, Not Malpractice)</li> <li>18Wrongful Death (Not Malpractice)</li> <li>19 Wrongful Eviction</li> <li>20 Friendly Suit</li> <li>21 Asbestos</li> <li>22 Toxic/Mass Torts</li> <li>23 Tobacco</li> <li>24 Lead Paint</li> </ul>
	SEE REVERSE SIDE AND CHECK HERE	IF USED

CV-496/June 2015

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## Information Sheet, Continued

C. OTHERS 01 Accounting 02 Att. Before Judgment 05 Ejectment 09 Special Writ/Warrants (DC Code § 11-941)	<ul> <li>17 Merit Personnel Act (OEA) (D.C. Code Title 1, Chapter 6)</li> <li>18 Product Liability</li> <li>24 Application:to Confirm, Modify,</li> </ul>	· · · · · · · · · · · · · · · · · · ·
<ul> <li>(De Code § 11-941)</li> <li>10 Traffic Adjudication</li> <li>11 Writ of Replevin</li> <li>12 Enforce Mechanics Lien</li> <li>16 Declaratory Judgment</li> </ul>	<ul> <li>24 Application to Commin, Mourly, Vacate Arbitration Award (DC Cod</li> <li>29 Merit Personnel Act (OHR)</li> <li>31 Housing Code Regulations</li> <li>32 Qui Tam</li> <li>33 Whistleblower</li> </ul>	e § 16-4401)
II. 03 Change of Name 06 Foreign Judgment/Domestic 08 Foreign Judgment/Internation 13 Correction of Birth Certificat 14 Correction of Marriage Certificate 26 Petition for Civil Asset Forfe 27 Petition for Civil Asset Forfe 28 Petition for Civil Asset Forfe	e 2-1802.03 (h) or 32-151 9 (a)] 20 Master Meter (D.C. Code § 42-3301, et seq.) eiture (Vehicle) eiture (Currency)	<ul> <li>21. Petition: for Subpoena [Rule 28-I (b)]</li> <li>22 Release Mechanics Lien</li> <li>23 Rule 27(a)(1) (Perpetuate Testimony)</li> <li>24 Petition for Structured Settlement</li> <li>25 Petition for Liquidation</li> </ul>
D. REAL PROPERTY	08 Quiet Title	
12 Specific Performance     04 Condemnation (Eminent Doma     10 Mortgage Foreclosure/Judici     11 Petition for Civil Asset Forfe	al Sale 🛛 🖾 31 Tax Lien Bid Off Certifica	at Denied
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CV-496/ June 2015

	Superior Cou	rt of the Distri	ict of Columbia		
		CIVIL DIVISIO	)N		
	С	ivil Actions Bra	nch		
L.S.	500 Indiana Avenue, 🛛	N.W., Suite 500	0 Washington, D.C. 20001		
	Telephone: (202) 8	79-1133 Website	e: www.dccourts.gov		
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Δ.)	<b>X</b> .		Case Number	2072 CA	001258.R
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	Former	Defendant			
		Derendant			

### **SUMMONS**

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

You are also required to file the original Answer with the Court in Suite 5000 at 500 Indiana Avenue, N.W., between 8:30 a.m. and 5:00 p.m., Mondays through Fridays or between 9:00 a.m. and 12:00 noon on Saturdays. You may file the original Answer with the Court either before you serve a copy of the Answer on the plaintiff or within seven (7) days after you have served the plaintiff. If you fail to file an Answer, judgment by default may be entered against you for the relief demanded in the complaint.

<u>VincentOrangeSR</u> Name of Plaintiff's Attorney		Clerk of the Court		
Name of Plaintiff's Attorney		Do 10	ERIOR	
Address	Ву	Deputy Clerk		/
Washington, DC200A				4
202-486-3201	Date	3/24/22		447
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IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT. IF YOU INTEND TO OPPOSE THIS ACTION, <u>DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME</u>.

If you wish to talk to a lawyer and feel that you cannot afford to pay a fee to a lawyer, promptly contact one of the offices of the Legal Aid Society (202-628-1161) or the Neighborhood Legal Services (202-279-5100) for help or come to Suite 5000 at 500 Indiana Avenue, N.W., for more information concerning places where you may ask for such help.

See reverse side for Spanish translation Vea al dorso la traducción al español

	TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA DIVISIÓN CIVIL Sección de Acciones Civiles 500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001 Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov			
	contra	Demandante		
<u></u>		Demandado	Número de Caso:	
Al susodicho Demandado:		CITATORIO		
-	-		una Contestación a la Demanda a	-

persona o por medio de un abogado, en el plazo de veintiún (21) días contados después que usted haya recibido este citatorio, excluyendo el día mismo de la entrega del citatorio. Si usted está siendo demandado en calidad de oficial o agente del Gobierno de los Estados Unidos de Norteamérica o del Gobierno del Distrito de Columbia, tiene usted sesenta (60) días, contados después que usted haya recibido este citatorio, para entregar su Contestación. Tiene que enviarle por correo una copia de su Contestación al abogado de la parte demandante. El nombre y dirección del abogado aparecen al final de este documento. Si el demandado no tiene abogado, tiene que enviarle al demandante una copia de la Contestación por correo a la dirección que aparece en este Citatorio.

A usted también se le require presentar la Contestación original al Tribunal en la Oficina 5000, sito en 500 Indiana Avenue, N.W., entre las 8:30 a.m. y 5:00 p.m., de lunes a viernes o entre las 9:00 a.m. y las 12:00 del mediodía los sábados. Usted puede presentar la Contestación original ante el Juez ya sea antes que usted le entregue al demandante una copia de la Contestación o en el plazo de siete (7) días de haberle hecho la entrega al demandante. Si usted incumple con presentar una Contestación, podría dictarse un fallo en rebeldía contra usted para que se haga efectivo el desagravio que se busca en la demanda.

Nombre del abogado del Demandante	SECRETARIO DEL TRIBUNAL	
	Por:	
Dirección	Subsecretario	
Teléfôno	Fecha	
如需翻译,请打电话 (202) 879-4828 Veuillez appele	er au (202) 879-4828 pour une traduction Đế có một bải dịch, hãy gọi (202) 879-4828	\$

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IMPORTANTE: SI USTED INCUMPLE CON PRESENTAR UNA CONTESTACIÓN EN EL PLAZO ANTES MENCIONADO O, SI LUEGO DE CONTESTAR, USTED NO COMPARECE CUANDO LE AVISE EL JUZGADO, PODRÍA DICTARSE UN FALLO EN REBELDÍA CONTRA USTED PARA QUE SE LE COBRE LOS DAÑOS Y PERJUICIOS U OTRO DESAGRAVIO QUE SE BUSQUE EN LA DEMANDA. SI ESTO OCURRE, PODRÍA RETENÉRSELE SUS INGRESOS, O PODRÍA TOMÁRSELE SUS BIENES PERSONALES O BIENES RAÍCES Y SER VENDIDOS PARA PAGAR EL FALLO. SI USTED PRETENDE OPONERSE A ESTA ACCIÓN, <u>NO DEJE DE CONTESTAR LA DEMANDA DENTRO DEL PLAZO EXIGIDO</u>.

Si desea conversar con un abogado y le parece que no puede pagarle a uno, llame pronto a una de nuestras oficinas del Legal Aid Society (202-628-1161) o el Neighborhood Legal Services (202-279-5100) para pedir ayuda o venga a la Oficina 5000 del 500 Indiana Avenue, N.W., para informarse sobre otros lugares donde puede pedirayuda al respecto.

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Superior Court of the District of Columbia CIVIL DIVISION **Civil Actions Branch** 500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001 Telephone: (202) 879-1133 Website: www.dccourts.gov laintiff Case Number 2022 CA 00 1258 13 un Businors ashin

### **SUMMONS**

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You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

You are also required to file the original Answer with the Court in Suite 5000 at 500 Indiana Avenue, N.W., between 8:30 a.m. and 5:00 p.m., Mondays through Fridays or between 9:00 a.m. and 12:00 noon on Saturdays. You may file the original Answer with the Court either before you serve a copy of the Answer on the plaintiff or within seven (7) days after you have served the plaintiff. If you fail to file an Answer, judgment by default may be entered against you for the relief demanded in the complaint.

runge SR Clerk of the Court Name of Plaintiff's Attorney ur St NE Bv outy Clerk 2001 Ζ Date Telephone 如需翻译,请打电话 (202) 879-4828 Veuillez appeler au (202) 879-4828 pour une traduction Để có một bài dịch, hãy gọi

IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER AQU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT. IF YOU INTEND TO OPPOSE THIS ACTION, <u>DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME</u>.

If you wish to talk to a lawyer and feel that you cannot afford to pay a fee to a lawyer, promptly contact one of the offices of the Legal Aid Society (202-628-1161) or the Neighborhood Legal Services (202-279-5100) for help or come to Suite 5000 at 500 Indiana Avenue, N.W., for more information concerning places where you may ask for such help.

See reverse side for Spanish translation Vea al dorso la traducción al español OF CO

	TRIBUNAL SUPERIOR DEL DIST DIVISIÓN CIV Sección de Acciones 500 Indiana Avenue, N.W., Suite 5000, Teléfono: (202) 879-1133 Sitio v	VIL Civiles , Washington, D.C. 20001	
	Demandante		
	contra		
		Número de Caso:	
	Demandado		
	CITATORIO		
Al susodicho Demandado:			
persona o por medio de u citatorio, excluyendo el di agente del Gobierno de l sesenta (60) días, contado enviarle por correo una o abogado aparecen al final	le cita a comparecer y se le require entregar n abogado, en el plazo de veintiún (21) días ía mismo de la entrega del citatorio. Si uster os Estados Unidos de Norteamérica o del C os después que usted haya recibido este cita copia de su Contestación al abogado de la de este documento. Si el demandado no tiene or correo a la dirección que aparece en este C	s contados después que usted h d está siendo demandado en ca Gobierno del Distrito de Colur atorio, para entregar su Contest a parte demandante. El nombre le abogado, tiene que enviarle al	aya recibido este lidad de oficial o mbia, tiene usted tación. Tiene que e y dirección del
Indiana Avenue, N.W., en	se le require presentar la Contestación origi tre las 8:30 a.m. y 5:00 p.m., de lunes a viern e presentar la Contestación original ante e	nes o entre las 9:00 a.m. y las 12	2:00 del mediodía

los sábados. Usted puede presentar la Contestación original ante el Juez ya sea antes que usted le entregue al demandante una copia de la Contestación o en el plazo de siete (7) días de haberle hecho la entrega al demandante. Si usted incumple con presentar una Contestación, podría dictarse un fallo en rebeldía contra usted para que se haga efectivo-el desagravio que se busca en la demanda.

Nontbre del abógado del Demandante		io dee inidonie
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Direedión		Subsecretario
	Fecha	
Telefono	· · · · · · · · · · · · · · · · · · ·	
如需翻译,请打电话 (202) 879-4828	Veuillez appeler au (202) 879-4828 pour une traduction	Đề cố một bải dịch, hãy gọi (202) 879-4828
번 <b>연韓중· 國하(대학(202)879-</b>	-4828 ድምመምትለ ዓይ የአማርኛ ትርጉም ለማግኘት (2	02) 879-4828 ይደውለ

IMPORTANTE: SI USTED INCUMPLE CON PRESENTAR UNA CONTESTACIÓN EN EL PLAZO ANTES MENCIONADO O, SI LUEGO DE CONTESTAR, USTED NO COMPARECE CUANDO LE AVISE EL JUZGADO, PODRÍA DICTARSE UN FALLO EN REBELDÍA CONTRA USTED PARA QUE SE LE COBRE LOS DAÑOS Y PERJUICIOS U OTRO DESAGRAVIO QUE SE BUSQUE EN LA DEMANDA. SI ESTO OCURRE, PODRÍA RETENÉRSELE SUS INGRESOS, O PODRÍA TOMÁRSELE SUS BIENES PERSONALES O BIENES RAÍCES Y SER VENDIDOS PARA PAGAR EL FALLO. SI USTED PRETENDE OPONERSE A ESTA ACCIÓN, <u>NO DEJE DE CONTESTAR LA DEMANDA DENTRO DEL PLAZO EXIGIDO</u>.

Si desea conversar con un abogado y le parece que no puede pagarle a uno, llame pronto a una de nuestras oficinas del Legal Aid Society (202-628-1161) o el Neighborhood Legal Services (202-279-5100) para pedir ayuda o venga a la Oficina 5000 del 500 Indiana Avenue, N.W., para informarse sobre otros lugares donde puede pedirayuda al respecto.

> Vea al dorso el original en inglés See reverse side for English original

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