

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

FILED
CIVIL DIVISION

2023 AUG 24 A 10:02

JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

JOSHUA WRIGHT,

Plaintiff,

v.

ELYSE DORSEY,

REDACTED

and

ANGELA LANDRY,

REDACTED

Defendants.

Case No. **2023 12232**

COMPLAINT

Defendants Elyse Dorsey and Angela Landry, both scorned, former lovers and law students of Plaintiff Joshua Wright, have embarked on a vendetta to destroy his reputation, portray themselves as #metoo victims, and make a fortune in the process. Their malicious lies have caused enormous damage. First, they targeted his employers and his clients, and threatened further reputational destruction if he did not pay them several million dollars. When he refused, they went to the press, claiming in a Law360 article that they submitted to romantic partnership with Mr. Wright because they felt pressured and fearful of retaliation, and portrayed him as a sexual predator. In well-documented reality, however, Defendants both pursued Mr. Wright at various times over the last decade, they had consensual, adult relationships

with him, and when those relationships ended, both were heartbroken because they had strong feelings for him.

Defendants have been devastatingly effective in their coordinated campaign to destroy Mr. Wright’s reputation. He files this lawsuit to hold them accountable for their lies. In support of his Complaint, Mr. Wright states as follows:

JURISDICTION

1. All tortious conduct occurred in Fairfax County, Virginia, and thus jurisdiction in this Court is proper.

THE PARTIES

2. Plaintiff Joshua Wright is a Virginia resident residing in Fairfax County. Mr. Wright was a law professor at George Mason University (“GMU”) and is now a lawyer in private practice.

3. Defendant Elyse Dorsey is a Virginia resident residing at [REDACTED] [REDACTED]. Defendant Dorsey is a partner at the major international law firm of Kirkland & Ellis LLP.

4. Defendant Angela Landry is a Virginia resident residing at [REDACTED] [REDACTED]. Defendant Landry is counsel at the major international law firm of Freshfields Bruckhaus Deringer.

THE FACTS

Mr. Wright’s Background

5. Mr. Wright is an attorney. He became a law professor at GMU in 2004. He resigned from that position in the summer of 2023.

6. Throughout his time teaching, GMU and others have repeatedly recognized the care and dedication he offers his students.

7. During his nearly twenty years at GMU, Mr. Wright supervised more than one hundred research assistants and taught thousands of students.

8. GMU Law promoted Mr. Wright to Assistant Professor in 2005, Associate Professor in 2010, and Professor of Law in 2011. Wright was recognized with the University-wide distinction of University Professor in 2016.

9. In 2014, the Federalist Society awarded Mr. Wright the Paul M. Bator Award, a national award given annually to a law professor under the age of 40 who has “demonstrated excellence in legal scholarship, a commitment to teaching, a concern for students, and who has made a significant public impact.”

10. Over the years, Mr. Wright left his position at GMU intermittently to enter public service at the Federal Trade Commission (FTC), including as FTC Commissioner.

11. While employed as a law professor at GMU, Mr. Wright also had various positions in private law practices and managed his own consulting business. He also served as the Executive Director of the Global Antitrust Institute at GMU.

Defendant Dorsey’s Long History with Mr. Wright

12. While teaching at GMU, Mr. Wright met Defendant Dorsey. Eventually, they began a romantic relationship. Both were married at the time and were aware of each other’s marital status.

13. Mr. Wright and Ms. Dorsey maintained a close relationship over the next eleven years, sometimes in a romantic capacity and sometimes not, but always as close friends and colleagues. Throughout that time, and regardless of the status of the romantic component of their relationship, Mr. Wright always supported Defendant Dorsey's career.

14. When Defendant Dorsey left law school in 2012, Mr. Wright wrote a letter of recommendation for her to clerk at a federal court. When Defendant Dorsey finished with her clerkship, Mr. Wright helped her secure interviews with several firms, including Wilson Sonsini Goodrich & Rosati, where she accepted a position.

15. At various points throughout their on-and-off relationship, Defendant Dorsey asked for help because she wanted to leave antitrust private practice. Mr. Wright, continuing to support her in any way he could, helped her interview with different "think tanks," as well as government agencies, including for key positions at the FTC and the Antitrust Division of the Department of Justice (DOJ).

16. Defendant Dorsey successfully secured positions at the FTC and the DOJ.

17. When Defendant Dorsey left the DOJ, she again sought career advice from Mr. Wright—she was unsure if she wanted to enter academia, move to an in-house counsel position, return to private practice, or go to graduate school. In response, Mr. Wright set up opportunities for her to talk to academics, created and raised funds for an academic fellowship at University of Virginia, and made a variety of calls supporting her for in-house jobs (including Amazon).

18. Indeed, in 2020 through 2021, he helped her obtain the fellowship with UVA, and she even took on consulting work for Mr. Wright's firm as an independent contractor to help her financially while waiting for her fellowship at UVA to begin.

19. Mr. Wright and Defendant Dorsey also published academic papers together (at least six over the course of four years) and worked together at GMU and elsewhere.

20. During the course of their relationship, the two traveled together dozens of times.

21. Outside of their romantic and professional relationship, the two always maintained an intimate friendship. In 2021, Defendant Dorsey confided in Mr. Wright about personal matters such as finding out her father was not her birth father and her feelings of loss after her aunt passed away. She told Mr. Wright then that "you're the person I want to talk to for everything good and bad."

22. Defendant Dorsey also confided in Mr. Wright, on two separate occasions, that she had been sexually assaulted by two different members of the antitrust bar. Mr. Wright believed her at the time.

23. Eventually, in late October 2021, Mr. Wright ended the off-an-on romantic relationship with Defendant Dorsey in a text message, telling her that he was seeing another woman. He also told her who it was.

24. The other woman—who is now Mr. Wright's live-in girlfriend—was not just any *other woman*. Defendant Dorsey had previously worked with her at the same firm. During that period, Mr. Wright and this other woman had been in a romantic

relationship. Defendant Dorsey knew about the relationship at the time, which overlapped with her own romantic relationship with Mr. Wright—and she hated her.

25. Defendant Dorsey was incensed. She immediately responded in text message, “WHAT THE ACTUAL FUCK” and “you know I deserve more than a fucking text right now.” **Exhibit A.**

26. She proceeded to send a series of angry text messages, including:

- a. “You *promised* me multiple times you would be here. But you’re doing the opposite – you’re abandoning me, in the worst possible way. That’s straight fucked up”
- b. “And I’m so embarrassed for thinking you ever respected me, let alone love me.”
- c. “I didn’t think I could hurt this much.”
- d. “You’re being so mean to me and IDK why.”
- e. “IDK what I’ve done so wrong in my life to end up in this total dumpster fire right now. Or why I’m so expendable to you. That you seem to keep going out of your way to hurt me.”
- f. “I need you, at a minimum, to call me, bc [sic] right now, I could not possibly think less of you. You say you’re all about loyalty – show it. Right now, for once.”
- g. She concluded with her disdain for the other woman: “I mean, I get you not wanting to see me. But you’re going back to [her] – after how horribly

she's treated you, your family, everyone you *say* you care about ...
Jesus Christ.”

27. Within days of sending the above text messages, Defendant Dorsey came uninvited to the law school, waited outside one of Mr. Wright's classes, and then followed him to his office.

28. Once in his office, she loudly yelled at him regarding the end of their relationship and demanded to have a conversation with him. Several people overheard her yelling.

29. After Mr. Wright refused to have a further conversation with her, Defendant Dorsey repeatedly tried to contact Mr. Wright's girlfriend with several calls and text messages, which were unwelcome by Mr. Wright's girlfriend.

30. Defendant Dorsey also repeatedly contacted Mr. Wright's assistant in an attempt to reach Mr. Wright or to disparage him.

31. Ultimately, this persistent and aggressive conduct made Mr. Wright fearful for his safety and his children's safety, as Defendant Dorsey had proven herself to be extremely erratic and unpredictable.

32. Defendant Dorsey's conduct persisted and worsened.

Defendant Dorsey's Vindictive Crusade to Destroy Mr. Wright

33. In retaliation for the breakup, Defendant Dorsey embarked on a pre-meditated plan to ruin Mr. Wright's life.

34. Having been one of Mr. Wright's closest confidants and a lover for over a decade, and having insider knowledge of his employment and his major clients, she knew exactly where and how to hurt him professionally and reputationally.

35. Within two months of the breakup, she filed a false Title IX complaint against him with GMU on December 12, 2021.

36. In it, Defendant Dorsey told horrific and obvious lies of sexual harassment to the Title IX Office; the facts of their longstanding—obviously consensual—relationship be damned.

37. Defendant Dorsey portrayed Mr. Wright in her Title IX complaint as a sexual predator and herself as a victim. Given their decade-long history, their traveling the world together, and their sharing the most intimate details of their lives, including both of their prior marriages, these allegations were patently ridiculous. Defendant Dorsey also falsely stated to the Title IX office that after *she* ended the relationship with Mr. Wright, he took adverse actions against her to retaliate for her terminating the relationship. As shown by the text messages, and the fact that he never took—or even had the power to take—the retaliatory actions she alleged, this was also a malicious lie.

Defendant Landry Joins the Crusade

38. Next, Defendant Dorsey attempted to recruit other former girlfriends of Mr. Wright to join her crusade. She successfully recruited Defendant Landry.

39. Multiple women have informed Mr. Wright that Defendant Dorsey or Defendant Landry, or both, have tried to recruit them to falsely accuse him of sexual misconduct.

40. Defendant Landry, like Defendant Dorsey, had engaged in a consensual sexual relationship with Mr. Wright that began at some point between 2009 and 2012 (during which period Defendant Landry was already in a long-term relationship). It ended in 2012, and then resumed in 2015 when Defendant Dorsey took a job at the FTC. Defendant Landry left the FTC in September 2015 to join a prestigious, international law firm, while her relationship with Mr. Wright continued into 2016.

41. When the relationship ended, also like Defendant Dorsey, Landry did not take it well. In a series of texts in December 2016, Defendant Landry tells Mr. Wright: “YOU were the one who told me you didn’t want to be with me after five years you were what I wanted and you couldn’t be with me”. **Exhibit B.**

42. Despite this bad breakup, Defendant Landry apparently decided to remain on good terms, and even reached out to Mr. Wright when she was having professional difficulties. In January 2019, when Defendant Landry was apparently being pushed out of her law firm, she sent Mr. Wright emails confiding in him and seeking his help. She wrote, among other things:

“Hey Josh — Still trying to wrap my head around all this... I hope you don’t mind me leaning on you right now. Your support and advice mean everything to me. . . .

Also, I’d like to talk to you about the GAI position that’s open. I’ve been thinking for a long time about asking you if there was any potential for me to work there, and I saw your tweet the other day that there actually is an opening. Maybe it’s serendipity? I miss being able to focus on

thoughtful antitrust analysis of the hard questions, and I definitely wasn't getting it at Weil, and I don't think I would at another firm. . . .

I'm still so upset about this. I knew I didn't want to be at Weil anymore, so I know this is right. I just wish I could have made the decision myself. I guess the whole shortening-the-partner-track thing was actually not a good thing for me. They made it sound like the counsel thing was automatic, but I must have understood it wrong. I guess I should have read between the lines. I hate being told that I'm not good enough and knowing that this is the way I'm perceived. I hate that myself worth is so tied up in how well I can do my job. I feel so shitty right now. I want to be good again. Thanks so much." **Exhibit C.**

43. When Mr. Wright responded that he would be happy to meet, but he was stuck in the Florida Keys, Defendant Landry responded, "OMG, stuck in the keys?! Definitely a disaster. I'm so sorry :) Let's get together later in the week. I'm going to work on my resume and stuff, and also work, tmrw. Just let me know what works for you. My schedule is pretty open..." **Exhibit C.**

44. After the two met over coffee, she thanked him for his help and outlined the plan he put together for her:

Thank you SO MUCH for meeting with me today. I'm starting to feel better about my career prospects now, and I can't tell you how much that means to me. I've submitted the application to Verizon and reached out to [name], and I'm hoping to get in touch with [name] soon. . . . Other items and next steps in the action plan: Potential in-house opportunities at Amazon, Walmart, Qualcomm, or Facebook; Potential opportunities with policy-oriented groups; Get in touch with [name] to discuss careers in antitrust policy and potentially a position working for the antitrust subcommittee; Get in touch with [name]. Thanks again. Have fun at practice! **Exhibit C.**

45. When Defendant Landry continued to struggle with finding a job, Mr. Wright provided her encouragement: "Most importantly, keep your head up and be patient. I know that is hard right now. But there is no failure on your part. And you

will work again and more than you want to in no time! :) The most important thing is to get the right situation picked to foster a good spot for you moving forward. So be patient.” **Exhibit C.**

46. As late as March 2019, Defendant Landry sent Mr. Wright a series of emails in a very casual tone, containing emojis and elongated words like “hiiii” which was clearly friendly and cordial.

47. Apparently, however, Defendant Landry’s friendly demeanor was reserved for times that she needed something from Mr. Wright. In approximately February 2020, Mr. Wright heard from his then and current girlfriend that Defendant Landry was still angry and had been saying derogatory things about him and their prior relationship. Mr. Wright’s then and current girlfriend, who was close with Defendant Landry—so close that she officiated Landry’s wedding—asked him to make amends with Landry. When he attempted to do so, Defendant Landry was clearly still raw about their relationship and said once again that “I was willing to do anything to be with you”.

48. These words, and those from December 2016, are not those of someone who was pressured to be in a relationship with Mr. Wright, as she is now claiming. These are the words of a scorned woman who had strong feelings for him.

49. Defendant Landry was therefore primed and ready to join Defendant Dorsey’s attack on Mr. Wright. The two of them met as early as January 1, 2022, and agreed to take acts jointly against Mr. Wright. Among those, Defendant Landry made

false allegations to GMU's Title IX office in support of Defendant Dorsey's complaint. It did not end there.

Defendants Target Mr. Wright's Clients and Demand Millions of Dollars

50. Over the next several months, Defendants escalated their attacks on Mr. Wright. They used their intimate and insider knowledge of his life to directly contact his clients, employers, and colleagues to spread their lies, and to destroy his reputation. They have been devastatingly successful. Defendants repeated the same lies that they told to GMU, including that Mr. Wright sexually harassed them or they at least indicated to Mr. Wright's clients that he was under investigation for sexual harassment, which was a thinly veiled way of affirmatively saying that he did, in fact, sexually harass his students. As a result, many of Mr. Wright's clients, not wanting to be associated with these sexual harassment claims, terminated their relationship with him, costing Mr. Wright hundreds of thousands of dollars.

51. On or about May 6, 2022, Defendants falsely told one of Mr. Wright's major clients that he was prohibited by the American Bar Association from participating in certain professional events, and that he had sexually harassed multiple students or at least that he was under investigation for the same but intending to convey that Mr. Wright did in fact commit those offenses.

52. The client suspended the business relationship, costing Mr. Wright approximately \$600,000 in lost revenue per year in a contract that would have ordinarily renewed, if not grown in scope, every year for the foreseeable future.

53. Further, Mr. Wright had an expert consulting contract with Kirkland & Ellis LLP. In approximately July of 2022, shortly after Defendant Dorsey began

working at Kirkland, she falsely told the attorneys with authority over Mr. Wright's contract that he had sexually harassed multiple students or at least that he was under investigation for the same but intending to convey that Mr. Wright did in fact commit those offenses. Kirkland immediately terminated Mr. Wright's contract, causing him substantial financial and reputational damages.

54. Additionally, Defendants spread their lies to practicing attorneys in the antitrust bar, from which Mr. Wright gains significant revenue through referrals. Defendants falsely told at least one antitrust lawyer, in an effort to recruit her into their scheme, that Mr. Wright had sexually harassed them.

55. After spreading their lies within Mr. Wright's professional circles, Defendants Dorsey and Landry, through their shared attorney, made a multi-million-dollar demand to keep them from further ruining his reputation with a meritless lawsuit.

Defendants Go Public with Their Lies

56. On the very day that Mr. Wright refused to pay what he viewed as an extortionate demand, Defendants each created Twitter accounts.

57. As if taken from a plot in a bad movie, Defendant Dorsey's first post on her newly created Twitter account stated: "I held out as long as I could...But now I have things to say" with a meme showcasing actress Amanda Bynes and the caption "I'm very pleased and scared to be here."



Elyse Dorsey @ElyseOnLife · Aug 8
I held out as long as I could...



But now I have things to say.



58. This “teaser” was no doubt created to draw people into a story that was about to be shared worldwide on the internet.

59. Defendants Dorsey and Landry began following high-profile accounts in antitrust law, and journalists to cause maximum harm to Mr. Wright when they shared their false stories.

60. Defendants contacted Aebra Coe with Law360, to publish their story.

61. Law360 agreed and published the story on August 14, 2023, titling it ‘I suffered silently’ Ex-Law Prof Allegedly Preyed on Students.’ Once published, it took the legal world, and especially the antitrust bar by storm. It was shared countless times on social media; harmful memes were created; and the public devastation began.

62. After Law360 published its story, many other news platforms began publishing stories of their own based upon what was stated in the Law360 article.

The list of those news organizations includes but is not limited to The Daily Mail, Law.com, and Above the Law.

63. The Law360 article, attached and incorporated as **Exhibit D** (the “Article”), contains numerous lies and omissions which taken as a whole created—and were intended to create—the false implication that Mr. Wright abused his position as a law professor to pressure Defendants into having unwelcome sexual relationships with him and that he retaliated against them as a result of them ending the relationships.

64. For example, in the Article, Defendant Dorsey claims that, prior to any sexual relationship, Mr. Wright essentially tricked her into accompanying him to what she thought was a platonic business trip to California to meet with clients, and then—to her great surprise—found that when they arrived there was “only one room with one bed” and that there were no client meetings. She claims that in the hotel room she “didn’t really feel like I had a choice” to engage in sexual contact with Mr. Wright, which she claims was the first time they had been intimate.

65. This account is a lie. While the trip itself did happen, Defendant Dorsey and Mr. Wright were already in a romantic, sexual relationship, which changes the entire context of the events. The trip was not some ruse to get Defendant Dorsey into a hotel room alone, it was a romantic getaway for two lovers to spend time in wine country.

66. Defendant Dorsey’s false account is straight out of a bad movie and is intended to portray Mr. Wright as a sexual predator and herself as a victim.

67. Defendant Dorsey also claims in the Article that Mr. Wright pressured her to keep their relationship a secret. This is similarly misleading, as it leaves out the fact that Defendant Dorsey also expressed her desire to keep the relationship secret, since both of them were married. Once again, Defendant Dorsey creates the implication that secrecy was one-sided and was intended by Mr. Wright to exercise power over her, when in reality, the desire for discretion was mutual for two consenting adults who were both married and did not want their respective spouses to know about the relationship.

68. Defendant Dorsey also leaves out the crucial context of their 11-year history of close, and often intimate relationship. She leaves out the fact that she continued to be involved with Mr. Wright long after graduating from law school. She knowingly took jobs working at the same company and would resume their romantic relationship even when they were not at the same company.

69. When Defendant Dorsey describes confronting Mr. Wright about an affair with another former GMU law student, she fails to mention that this person was not just some “former GMU student” but was a romantic rival; a woman who also had a long-term on-and-off relationship with Mr. Wright, which had overlapped with Defendant Dorsey’s romantic relationship. Once again, Defendant Dorsey intends to portray Mr. Wright as a sexual predator, but in reality, this is about a love-triangle among consenting adults. Defendant Dorsey creates the false impression that this affair was something new she had just learned, when in fact she had known about the relationship for many years and that she was upset not because this was a “former

GMU student” but because it was her romantic rival, and that Mr. Wright had chosen her over Dorsey. Indeed, Defendant Dorsey was well aware that Mr. Wright and this “former GMU student” are still together in a committed relationship, and she intentionally leaves out that information to create the false implication that Mr. Wright preys on students.

70. Defendant Dorsey then claims that Mr. Wright retaliated against her after *she* ended the relationship. This is false on every level. Not only do her own texts show that it was Mr. Wright who definitively ended the relationship with her, but she also knew based on emails and the evidence in the underlying Title IX case that Mr. Wright had in fact continued to help her professionally, and that he did not have any authority over her employment at GMU, which she says ended abruptly.

71. Defendant Landry’s allegations are similar to Dorsey’s, and are similarly dishonest. She claims to have felt that “she couldn’t say no to Wright” and that she was constantly fearful of what might happen to her professionally if she didn’t maintain a sexual relationship with Mr. Wright. The overall implication of Defendant Landry’s allegations is to portray Mr. Wright as a sexual predator, and herself as a victim.

72. As shown in the multitude of texts and emails, Defendant Landry maintained her consensual relationship with Mr. Wright for years after graduating, and was upset when the relationship ended. She said that Mr. Wright was what she “wanted” and that she was “willing to do anything to be with [Wright].”

73. Defendant Landry then tweeted that Mr. Wright was the Harvey Weinstein of law, intending to and creating the impression that Mr. Wright was a vile predator who forced women to have sex with him:



74. Defendant Landry implied in the Law360 article that Mr. Wright never assisted her with work or with professional connections after their sexual contact ceased, stating, “once he was done with me, those things stopped coming.” This is demonstrably false, as shown by emails and text messages between Defendant Landry and Mr. Wright in 2019 when, well after any sexual relationship had ended, Mr. Wright went to great lengths to assist her in her time of professional need when she was pushed out of her law firm job and seeking advice and new employment.

75. The Law360 article also reported that GMU has a consensual relationships policy. Notably, the consensual relationships policy is a disclosure policy that went into effect on June 28, 2012. Defendants Dorsey and Landry graduated in May 2012 and therefore that policy was not in effect at the time.

76. As a result of the publication of the Law360 article, Mr. Wright lost renewing contracts with multiple major consulting clients and employers, with a total

value of approximately \$1.55 million/year. He continues to suffer damages and lost business.

77. Defendants used the hashtags #metoo and #metoolaw, attempting to use the momentum of the 'MeToo' movement to gain their own notoriety and fame.

78. Defendants' allegations of sexual misconduct were made with actual malice because both Defendants Dorsey and Landry knew that they were false and that they were never subjected to any sexual misconduct by Mr. Wright; rather, they participated in years-long consensual romantic relationships as well as friendships with him.

COUNT I
DEFAMATION AND DEFAMATION *PER SE*
(Against Both Defendants)

79. Mr. Wright incorporates herein the allegations contained in all preceding paragraphs.

80. To recover under defamation, a plaintiff must prove (1) publication of (2) an actionable statement with (3) the requisite intent.

81. In communications with Mr. Wright's employers, clients, and the media, Defendants purposely caused to be published false and defamatory statements, both directly and by implication, about Mr. Wright with the intent on harming Mr. Wright.

82. Specifically, they falsely alleged to multiple clients, employers, and colleagues that Mr. Wright had conducted sexual misconduct.

83. They alleged in the Law360 article and in tweets, by direct allegations and by implications, that Mr. Wright was a sexual predator and had engaged in sexual harassment and misconduct.

84. Defendants, as alleged herein, made their statements with the design and intent of implying falsely that Mr. Wright had engaged in sexual misconduct with them and with other women and that he had utilized his position as a professor to retaliate against them and other women. Defendants did so in a context that would cause reasonable listeners and readers to infer their intended defamatory meaning. Mr. Wright has suffered greatly as a result.

85. Defendants' campaign smeared Mr. Wright as a sexual predator and they told specific lies about him not helping them with their careers after the sexual relationship ended. Additionally, by claiming that they felt they could not say "no," they are falsely claiming that the relationship was not consensual.

86. A plaintiff may recover under defamation *per se* where a defendant's defamatory publications are (1) those which impute to a person the commission of some criminal offense involving moral turpitude, for which the party, if the charge is true, may be indicted and punished; (2) those which impute that a person is infected with some contagious disease, where if the charge is true, it would exclude the party from society; (3) those which impute to a person unfitness to perform the duties of an office or employment of profit, or want of integrity in the discharge of the duties of such an office or employment; or (4) those which prejudice such person in his or her profession or trade.

87. Defendants' statements were defamatory *per se* because they falsely accused Mr. Wright of sexual harassment and misconduct, which at a minimum, prejudices Mr. Wright in his profession or trade as a law professor and lawyer.

88. Defendants Dorsey and Landry published the lies to Mr. Wright's clients, employers, and the media.

89. Those publications were false accusations of sexual harassment, which constitutes defamation *per se*.

90. In doing so, Defendants acted with actual malice or with a reckless disregard of the truth or were at least negligent in making those statements.

91. The defamatory statements have directly and proximately caused Mr. Wright to suffer significant damages, including pecuniary damages, damage to his reputation, humiliation, embarrassment, and mental anguish, all of which are ongoing in nature and will be suffered in the future. These damages were foreseeable to Defendants.

92. Because Defendants published the defamatory communications knowingly, intentionally, willfully, wantonly, and maliciously, with intent to harm Mr. Wright, or in blatant disregard for the substantial likelihood of causing him harm, Mr. Wright is entitled to an award of punitive damages.

93. As a direct and proximate result of Defendants' conduct, Mr. Wright is entitled to compensatory, special, and punitive damages. Mr. Wright is also entitled to injunctive relief and to attorney fees for Defendants' malicious and wanton conduct.

COUNT II
TORTIOUS INTERFERENCE
(Against Both Defendants)

94. Mr. Wright incorporates herein the allegations contained in all preceding paragraphs.

95. Tortious interference includes (1) the existence of a valid contractual relationship or business expectancy; (2) knowledge of the relationship or expectancy on the part of the interferor; (3) intentional interference inducing or causing a breach or termination of the relationship or expectancy; and (4) resultant damage to the party whose relationship or expectancy has been disrupted.

96. Here, Mr. Wright meets the elements for tortious interference, whether for tortious interference with contractual relations or business expectancy.

97. Mr. Wright had a contractual relationship or business expectancy with his clients. Specifically, he held contracts with his major consulting client (known to Defendants Dorsey and Landry) and with Kirkland, and an employment contract with GMU, among others. He also had an established practice of gaining referrals through attorneys at the antitrust bar.

98. Defendants had knowledge of the contractual or business relationships, due to their previous friendship and contact with Mr. Wright as well as evidenced by them purposefully calling or reporting to these clients and contacts to sabotage Mr. Wright's relationships with them.

99. Defendants intentionally contacted Mr. Wright's clients and contacts with the purpose of ending the contractual or business relationship and succeeded in this purpose.

100. As a direct and proximate result of Defendants' conduct, Mr. Wright has been damaged in his relationships with these clients and contacts and is entitled to compensatory damages.

COUNT III
STATUTORY CONSPIRACY
(Against Both Defendants)

101. Mr. Wright incorporates herein the allegations contained in all preceding paragraphs.

102. Mr. Wright also has claims for business conspiracy arising under Va. Code §18.2-499 and Va. Code §18.2-500.

103. To recover in a business conspiracy theory, a plaintiff must show (1) a combination of two or more persons for the purpose of willfully and maliciously injuring plaintiff in his business and (2) resulting damage to plaintiff.

104. Here, Defendants combined their efforts to falsely accuse Mr. Wright of sexual misconduct to destroy his professional reputation and business.

105. Mr. Wright was then fired by or lost contracts with several of his high-paying clients.

106. As explained above, Defendants' relentless and malicious conduct constitutes tortious interference, which triggers the business conspiracy statute.

107. As a direct and proximate result of Defendants' conduct, Mr. Wright has been damaged in his relationships with these clients and is entitled to compensatory damages.

108. Therefore, Defendants are liable for business conspiracy and subject to recovery of "three-fold the damages by [Mr. Wright] sustained, and the costs of suit, including a reasonable fee to plaintiff's counsel." Va. Code §18.2-500.

COUNT IV
COMMON LAW CONSPIRACY
(Against Both Defendants)

109. Mr. Wright incorporates herein the allegations contained in all preceding paragraphs.

110. Mr. Wright also has viable claims for common law conspiracy under Virginia common law. "In Virginia, the elements of a common law civil conspiracy claim are (i) an agreement between two or more persons (ii) to accomplish an unlawful purpose or to accomplish a lawful purpose by unlawful means, which (iii) results in damage to plaintiff." *Firestone v. Wiley*, 485 F. Supp. 2d 694, 703 (E.D. Va. 2007), *citing Glass v. Glass*, 228 Va. 39, 47, 321 S.E.2d 69 (1984).

111. Here, Defendants combined their efforts to falsely accuse Mr. Wright of sexual misconduct to destroy his professional reputation and business.

112. Mr. Wright was then fired by or lost contracts with several of his high-paying clients.

113. As a direct and proximate result of Defendants' conduct, Mr. Wright has been damaged in his relationships with these clients and is entitled to compensatory damages.

114. Therefore, Defendants are liable for damages for common law conspiracy.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Joshua Wright, by counsel, demands judgment against Defendants, Elyse Dorsey and Angela Landry, as follows:

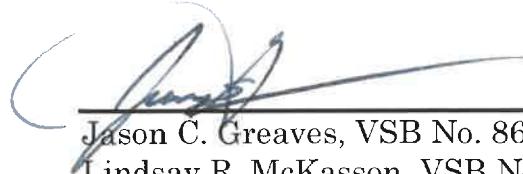
- a. An award of compensatory, special, and punitive damages of one hundred and eight million dollars (\$108,000,000), plus pre-judgment interest;
- b. Injunctive relief prohibiting the publication or republication of the defamatory statements;
- c. An award of Plaintiff's costs associated with this action, including but not limited to his reasonable attorneys' fees and expenses; and
- d. Such other and further relief that this Court deems just, equitable, and proper.

JURY DEMAND

Plaintiff Joshua Wright demands a trial by jury.

Dated: August 24, 2023

Respectfully submitted,



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