

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
 COUNTY DEPARTMENT, LAW DIVISION

STAHULAK & ASSOCIATES, L.L.C., an)	
Illinois Limited Liability Company, and)	
THOMAS STAHULAK, an individual,)	COMPLAINT
)	
Plaintiffs,)	DAMAGES OVER \$30,000.00
)	
v.)	
)	Case No.:
JOHN DOE a/k/a Lakhani.erum@yahoo.com,)	
an individual,)	JURY TRIAL
)	
Defendant.)	

COMPLAINT

NOW COMES the Plaintiffs STAHULAK & ASSOCIATES, L.L.C (“Stahulak & Associates”) and Thomas Stahulak (“Stahulak”) (collectively “Plaintiffs”), by and through their attorneys, Mudd Law Offices, and complain of Defendant JOHN DOE a/k/a Lakhani.erum@yahoo.com¹ (“Defendant”), upon personal information as to their own activities, and upon information and belief as to the activities of others and all other matters, and state as follows:

NATURE OF ACTION

1. This is an action for defamation *per se*, false light, and tortious interference with prospective business relations.
2. By this action, the Plaintiffs seek compensatory damages, punitive damages, injunctive relief, and all other relief to which they may be entitled as a matter of law.

¹ The Plaintiffs cannot be certain of the gender of the Defendant, but for the purposes of simplicity will refer to the Defendant using the pronouns “he” or “him” and the pronominal adjective “his.”

PARTIES

3. STAHULAK & ASSOCIATES, LLC is an Illinois Limited Liability Company with a principle place of business in Cook County, Illinois.

4. THOMAS STAHULAK is a citizen of the State of Illinois and a resident of Cook County, Illinois.

5. JOHN DOE is, upon information and belief, an unknown individual residing in Cook County, Illinois.

JURISDICTION AND VENUE

6. This Court has jurisdiction over the Defendant as, upon information and belief, he is an Illinois citizen and resides in Cook County, Illinois (“Cook County”).

7. Additionally, this Court possesses jurisdiction over the Defendant as, upon information and believe, he engaged in most, if not all, of his wrongful conduct in Cook County.

8. Venue is proper as, upon information and belief, the Defendant resides in Cook County and most of the conduct at issue occurred within Cook County.

9. Jurisdiction and venue are also proper in Cook County because the Defendant directed his conduct and communications to people within Cook County who might hire and/or seek employment with Stahulak & Associates and, by doing so, sought to harm the Plaintiffs in Cook County.

10. An actual case or controversy has arisen between the Parties.

11. The Defendant has engaged in intentional conduct with actual malice by publishing false and defamatory statements about the Plaintiffs with the knowledge the statements were false.

12. The Defendant’s intentional conduct has harmed the Plaintiffs.

13. The Plaintiffs have been injured by the Defendant's conduct and have suffered damages resulting therefrom.

FACTUAL BACKGROUND

Stahulak & Associates

14. Stahulak is an attorney licensed to practice law in the State of Illinois.

15. Stahulak has been good standing and licensed to practice law in the State of Illinois since 2006.

16. Stahulak founded Stahulak & Associates in 2008.

17. Stahulak & Associates operates as a law firm in the Chicagoland area including, but not limited to, Cook County, Illinois.

18. Stahulak & Associates specializes in bankruptcy law.

19. Stahulak & Associates is a client oriented bankruptcy firm whose goal is to arm clients with effective solutions and achieve financial health.

20. Stahulak & Associates prides itself on assisting its clients with navigating the legal proceedings associated with Chapter 7 and Chapter 13 bankruptcy.

21. Prior to the statements at issue in this action, Stahulak & Associates had developed a good reputation.

Glassdoor

22. Glassdoor, Inc. operates a website entitled "Glassdoor" on which current and former employees of businesses can post reviews about their employers and management.

23. Reviews posted to Glassdoor can be made anonymously.

24. In fact, Glassdoor states:

Your contributions are anonymous to other users – meaning we will never display your email address, Facebook profile, or any personal information . . . with any of your contributions.

25. As of September 2015, eight million reviews for 400,000 companies had been submitted to Glassdoor.

26. To submit a review, an individual needs to create an account.

27. However, an individual does not need to provide a real name to create an account.

28. Glassdoor does not require an individual to submit verification of employment when creating an account.

29. Glassdoor collates the reviews submitted about businesses and calculates a rating of CEOs and workplaces.

30. Glassdoor’s ratings of CEOs and workplaces are widely reported.

31. Media have described Glassdoor’s ratings as “well-respected.”

32. Consequently, individuals reading reviews and ratings on Glassdoor will perceive them to be authentic and “well-respected.”

Defendant’s Wrongful Conduct

33. On December 27, 2014, an anonymous individual who purported to be a “Former Intern – Attorney” who “worked at Stahulak & Associates” as an intern posted a “review” of Stahulak & Associates on a webpage allocated to Stahulak & Associates on the website Glass Door found at the URL <http://www.glassdoor.com/Reviews/Stahulak-and-Associates-Reviews-E938066.htm>.

34. The Plaintiffs do not employ interns.

35. In the review posted on December 27, 2014 (“December 27 Review”), the individual posting the review stated in relevant part:

the turnover rate is so high that the website doesn't even list the attorneys and staff, they force paralegals to do attorney work and do not allow the paralegals to tell clients that they aren't attorneys, they have camera setup all over and the two owners watch the two associates all day, they record your phone calls, the office is bugged . . . the two owners . . . listen to your phone calls instead of working themselves . . .

36. The December 27 Review contained a rating of one star.

37. The December 27 Review included comments of "Doesn't Recommend" and "Negative Outlook."

38. The Defendant posted the December 27 Review.

39. On February 12, 2015, an individual sent a message to the Plaintiffs through the Stahulak & Associates website stating, "why doesn't your page have attorneys' profiles? I want to know an attorney's credentials before I retain them."

40. The content of the message sent on February 12, 2015 ("February 12 Message") reflects some of the same content of the December 27 Review.

41. The Defendant sent the February 12 Message.

42. The Defendant used the email address lakhani.erum@yahoo.com to send the February 12 Message.

43. At this time, the Plaintiffs learned of the December 27 Review.

44. The December 27 Review appeared, at first, to be an isolated incident.

45. However, additional negative reviews supposedly written by "previous firm employees" began to appear.

46. On March 9, 2015, an anonymous individual purporting to be a "Former Employee – Paralegal" of Stahulak & Associates posted a "review" about it.

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47. In the review posted on March 9, 2015 (“March 9 Review”), the individual posting the review stated in relevant part:

There was an alarming amount of micro-managing and psychological games where they blamed the workers for dissatisfied clients.

48. The March 9 Review also stated as “pros” of the firm “None. I would never recommend this place to anyone.”

49. The Defendant posted the March 9 Review.

50. On July 7, 2015, an anonymous individual purporting to be a “Former Employee – Attorney” of Stahulak & Associates posted a “review” about it.

51. In the review posted on July 7, 2015 (“July 7 Review”), the individual posting the review stated:

I worked here for a few months and in my short time I saw four other attorneys hired and fired. Most lasted less than two weeks. The management of the firm is very passive-aggressive and difficult to work with. In addition, the management spends their time watching and listening to the employees, as mentioned in the other review Management are the most unprofessional people I have ever worked with Would purposely conceal their names from clients to avoid bar complaints. The previous posts sound crazy but they are absolutely true. They have cameras, monitor phone, and internet, and micromanage to a degree that is unbelievable. They take advantage of new attorneys that are desperate for a position given the awful job market. You will work every Saturday. You will work until 9:00 every day. The pay is worse than working in fast food and you have no future with the firm. They use you until you break and then replace you. They put you in compromising positions without adequately preparing you so that you absorb the professional liability and shield them from responsibility. On one occasion, they accused me of stealing or losing a client's retainer. They hounded me for hours on my one day off and then never acknowledged that they had misplaced the money themselves or apologized for the mistake. I understand it is tough out there, but even document review is a better alternative to working here.

52. The July 7 Review included comments of “Doesn't Recommend” and “Negative Outlook.”

53. The Defendant posted the July 7 Review.

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54. On September 1, 2015, an anonymous individual purporting to be a “Former Employee – Receptionist” of Stahulak & Associates posted a “review” about it.

55. In the review posted on September 1, 2015 (“September 1 Review”), the individual posting the review stated in relevant part:

It feels like you're being spied on during work – recorded phone calls. cameras in every corner of the office, etc. It just isn't a good, welcoming environment. I was being told with every phone call to tell them that we will look into it and call them back, which never happens. You can only imagine when these people's houses are about to sell and they are about to lose everything how their demeanor is on the phone.

56. The September 1 Review included comments of “Doesn't Recommend” and “Negative Outlook.”

57. The Defendant posted the September 1 Review.

58. On September 11, 2015, an anonymous individual purporting to be a “Former Contractor – Lawyer” of Stahulak & Associates posted a “review” about it.

59. The Plaintiffs do not staff “contractors.”

60. In the review posted on September 11, 2015 (“September 11 Review”), the individual posting the review stated in relevant part, “No pay, spying, questionable client practices.”

61. The September 11 Review included comments of “Doesn't Recommend” and “Negative Outlook.”

62. The Defendant posted the September 11 Review.

63. The December 27 Review, the March 9 Review, the July 7 Review, the September 1 Review, and September 11 Review shall collectively be known as the “Glassdoor Statements.”

False Nature of the Glassdoor Statements

Working Conditions

64. The December 27 Review contained numerous false and defamatory statements about the Plaintiffs, including statements regarding the working conditions at Stahulak & Associates.

65. The December 27 Review stated Stahulak & Associates did not provide its staff with lunch breaks or breaks during the workday.

66. Since the publication of this statement, any individual reading the December 27 Review might believe that the Plaintiffs do not provide their employees lunch breaks or any breaks for that matter.

67. The Plaintiffs provide their employees breaks.

68. The December 27 Review states “[Stahulak & Associates] have [sic] cameras set up all over and the two owners watch the two associates all day.”

69. Since the publication of this statement, any individual reading the December 27 Review might believe that the Plaintiffs monitor the movements and actions of their associate attorneys.

70. The Plaintiffs do not monitor the movement or actions of its associate attorneys.

71. The December 27 Review states “the office is bugged.”

72. Since the publication of this statement, any individual reading the December 27 Review might believe that Stahulak & Associates’ office is bugged.

73. The Plaintiffs’ office is not bugged.

74. The December 27 Review states the Plaintiffs “monitor your every key stroke on the computer.”

75. Since the publication of this statement, any individual reading the December 27 Review might believe that the Plaintiffs do, in fact, monitor their staff's computers for every key stroke.

76. The Plaintiffs do not monitor their staff's computers for every key stroke.

77. The March 9 Review contained false and defamatory statements regarding the working conditions at Stahulak & Associates.

78. In the March 9 Review, an individual claiming to be a former paralegal stated that the Plaintiffs engage in "psychological games where they blamed the workers for dissatisfied clients."

79. Since the publication of this statement, any individual reading the March 9 Review might believe that the Plaintiffs engage in psychological games with their staff.

80. The Plaintiffs do not engage in psychological games with their staff.

81. Since the publication of this statement, any individual reading the March 9 Review might believe that the Plaintiffs tormented their staff.

82. The Plaintiffs do not torment its staff.

83. Since the publication of this statement, any individual reading the March 9 Review might believe that the Plaintiffs unnecessarily blamed their staff for dissatisfied clients.

84. The Plaintiffs do not unnecessarily blame their staff for dissatisfied clients.

85. The July 7 Review contained false and defamatory statements regarding the working conditions at Stahulak & Associates.

86. In the July 7 Review, the Defendant stated that the Plaintiffs "accused me of stealing or losing a client's retainer."

87. Since the publication of this statement, any individual reading the July 7 Review might believe that the Plaintiffs accuses their staff of crimes.

88. The Plaintiffs do not accuse their staff of crimes.

89. The September 1 Review contained false and defamatory statements regarding the working conditions at Stahulak & Associates.

90. In the September 1 Review, the Defendant stated that the Plaintiffs tell employees to advise clients “that we will look into it and call them back, which never happens.”

91. Since the publication of this statement, any individual reading the September 1 Review might believe the Plaintiffs request their staff to make misstatements to its clients and, by doing so, places its staff in uncomfortable situations.

92. The Plaintiffs do not instruct their employees to make misrepresentations to its clients.

93. The Plaintiffs do not instruct their staff to advise clients they will call them back without any intention of doing so.

94. The September 11 Review contained false and defamatory statements regarding the working conditions at Stahulak & Associates.

95. In the September 11 Review, the Defendant claimed that at Stahulak & Associates there is “no pay, [the Plaintiffs engage in] spying, [and] questionable client practices.”

96. Since the publication of this statement, any individual reading the statements might believe that the Plaintiffs do not pay their staff.

97. The Plaintiffs pay their staff.

98. Since the publication of this statement, any individual reading the statements might believe that the Plaintiffs spy on their staff.

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99. The Plaintiffs do not spy on their staff.

100. The Glassdoor Statements, individually and collectively, portray the Plaintiffs as employers that mistreat employees.

101. The Glassdoor Statements, individually and collectively, portray the Plaintiffs as employers that require their employees to engage in questionable practices.

102. The Glassdoor Statements, individually and collectively, portray the Plaintiffs as employers that may violate local, state, and federal laws governing workplace environments.

103. The Plaintiffs do not mistreat its employees or ask them to engage in questionable practices. Indeed, it complies with all applicable laws and expects their employees to do the same.

104. Based on the foregoing, the Glassdoor Statements portray the Plaintiffs as lacking in integrity and prejudice them in their legal profession as a law firm and attorney.

105. By portraying the Plaintiffs as lacking in integrity and prejudicing them, the Glassdoor Statements may deter and in fact likely have deterred potential employees from becoming employed at Stahulak & Associates.

106. Indeed, some potential candidates interviewed by the Plaintiffs have inquired about the Glassdoor Statements.

107. By portraying the Plaintiffs as lacking in integrity and prejudicing them in their legal profession and business as a law firm and attorney, the Glassdoor Statements may deter and in fact likely have deterred potential clients from engaging the Plaintiffs and their legal services.

Professionalism

108. The July 7 Review contained false and defamatory statements regarding the professionalism of the Plaintiffs.

109. In the July 7 Review, the Defendant stated that the firm “accused me of stealing or losing a client’s retainer.”

110. The Plaintiffs have not accused any attorneys of stealing or losing a client’s retainer.

111. The September 1 Review contained false and defamatory statements regarding the professionalism of the Plaintiffs.

112. In the September 1 Review, the Defendant stated that the Plaintiffs tell employees to advise clients “that we will look into it and call them back, which never happens.”

113. The Plaintiffs do not misrepresent matters to their clients and certainly do not instruct their staff to do so.

114. The Plaintiffs do, in fact, return their clients’ phone calls.

115. The September 11 Review contained false and defamatory statements regarding the professionalism of the Plaintiffs.

116. In the September 11 Review, the Defendant claimed that the Plaintiffs engage in “questionable client practices.”

117. The Plaintiffs do not engage in questionable client practices.

118. Based on the foregoing, the Glassdoor Statements falsely portray the Plaintiffs as lacking in professionalism.

119. As such, the Glassdoor Statements falsely impute a lack of integrity to the Plaintiffs.

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120. As such, the Glassdoor Statements falsely impute a lack of ability to the Plaintiffs.

121. As such, the Glassdoor Statements prejudice the Plaintiffs in their legal profession and business as a law firm and attorney.

122. Additionally, the Glassdoor Statements prejudice the Plaintiffs by deterring potential clients from hiring them and/or potential employees from being employed by them.

123. Since the publication of the Glassdoor Statements, any individual reading the statements relating to professionalism would believe the Plaintiffs lack integrity in their legal services.

124. Since the publication of the Glassdoor Statements, any individual reading the statements relating to professionalism would believe the Plaintiffs lack ability in their legal services.

125. Since the publication of the Glassdoor Statements, any individual reading the statements relating to professionalism would be prejudiced against the Plaintiffs in their legal services.

Unethical Legal Practices

126. The December 27 Review contained false and defamatory statements portraying the Plaintiffs as unethical.

127. In the December 27 Review, the Defendant stated the Plaintiffs “force[d] paralegals to do attorney work and do not allow the paralegals to tell clients that they aren’t attorneys.”

128. Since the publication of this statement, any individual reading the December 27 Review might believe that the Plaintiffs force their paralegals to complete attorney work without properly advising the clients.

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129. The Plaintiffs do not force paralegals to complete attorney work. In fact, Stahulak & Associates does not have its paralegals do work that only attorneys may do.

130. Should the Plaintiffs allow paralegals to complete work that only attorneys may do, the Plaintiffs would be engaging in misconduct under the Illinois Rules of Professional Conduct.

131. The Plaintiffs have not engaged in misconduct under the Illinois Rules of Professional Conduct.

132. The July 7 Review contained false and defamatory statements portraying the Plaintiffs as unethical.

133. In the July 7 Review, the Defendant claimed that attorneys at Stahulak & Associates “would purposely conceal their names from clients to avoid bar complaints.”

134. Since the publication of this statement, any individual reading the July 7 Review might believe that the Plaintiffs engaged in conduct that would warrant a bar complaint.

135. Since the publication of this statement, any individual reading the July 7 Review might believe that the Plaintiffs concealed their attorneys’ names.

136. Since the publication of this statement, any individual reading the July 7 Review might believe that the Plaintiffs would conceal information, particularly attorneys’ names, from clients to avoid a bar complaint.

137. To a seasoned attorney, such allegations would be ludicrous given the client would, if nothing more, know the name of the firm and its owners under which a bar complaint could be filed.

138. Moreover, an individual could look up an attorney on the website for the Illinois Attorney Registration and Disciplinary Committee (“ARDC”) and determine the attorney’s current employer.

139. However, an average lay person and even a young attorney could read such statements and believe that the Plaintiffs engaged in conduct warranting bar complaints and made efforts to avoid such complaints by hiding the identities of their attorneys.

140. As such, the July 7 Review falsely portrays the Plaintiffs as engaging in misconduct given hiding attorneys’ names would violate the Illinois Rules of Professional Conduct.

141. To conceal the name of an attorney representing a client on any matter would be considered misconduct under the Illinois Rules of Professional Conduct.

142. In the July 7 Review, the Defendant further states, “[t]hey put you in compromising positions without adequately preparing you so that you absorb the professional liability and shield them from responsibility.”

143. Since the publication of this statement, any individual reading the July 7 Review might believe that the Plaintiffs engaged in conduct that would present a liability issue.

144. Since the publication of this statement, any individual reading the July 7 Review might believe that the Plaintiffs used their attorneys to shield the firm from liability.

145. Once again, a seasoned attorney would understand that the Plaintiffs would be responsible for the conduct of its associates and staff. As such, the Plaintiffs cannot possibly place anyone in a situation to “absorb the professional liability and shield them from responsibility.”

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146. However, an average lay person or even a young attorney could read such statements and believe that the Plaintiffs engage in conduct that could expose it or its attorneys to liability.

147. An average layperson or even a young attorney could also read such statements and believe that the Plaintiffs use their associates to shield themselves from liability.

148. As such, the July 7 Review falsely portrays the Plaintiffs as engaging in conduct that would give rise to liability issues and that misuses their employees to avoid liability.

149. Failure to adequately supervise subordinate attorneys and legal staff would be considered misconduct under the Illinois Rules of Professional Conduct.

150. The Plaintiffs adequately supervise both their attorneys and legal staff.

151. The Plaintiffs do not engage in conduct that would expose its attorneys or legal staff to liability.

152. Further, the Plaintiffs do not place attorneys in compromising positions to avoid responsibility.

153. The September 11 Review contained false and defamatory statements regarding the ethical practices at the Plaintiffs.

154. In the September 11 Review, the Defendant stated that the Plaintiffs engaged in “questionable client practices.”

155. Since the publication of this statement, any individual reading the statements might believe that the Plaintiffs engaged in questionable client practices.

156. The use of the term “questionable client practices” might lead readers to believe the Plaintiffs commit legal malpractice.

157. The use of the term “questionable client practices” might lead readers to believe the Plaintiffs violate the Illinois Rules of Professional Responsibility.

158. The Plaintiffs do not engage in questionable client practices.

159. Since the publication of the Glassdoor Statements, any individual reading the statements relating to ethics would be prejudiced against the Plaintiffs in their legal practice.

160. Since the publication of the Glassdoor Statements, any individual reading the statements relating to ethics would believe the Plaintiffs lack credibility in their legal services.

161. Since the publication of the Glassdoor Statements, any individual reading the statements relating to ethics would believe the Plaintiffs lacks ability in their legal services.

Additional Communications to Office

162. On September 18, 2015, the Defendant also sent a message to the Plaintiffs through the firm website stating, “[r]ead your glassdoor reviews, you are horrible people and there is a reason you cannot retain attorneys at your firm. Linda you are the most unlikeable human one could encounter. Please change.”

163. The content of the message sent on September 18, 2015 (“September 18 Message”) directs the Plaintiffs to the Glassdoor Statements.

164. The September 18 Message reflects some of the same content of the Glassdoor Statements.

165. The Defendant sent the September 18 Message.

166. The Defendant used the email address lakhani.erum@yahoo.com to send the September 18 Message.

167. On September 23, 2015, the Defendant sent a message to the Plaintiffs through the firm website stating, “please share as to why you are such horrible people? You have terrible

yet honest glassdoor reviews, and you still don't get it. Nobody likes Linda or Tom at all, hence why you can't retain any attorneys. Linda is pure evil. Your practice deserves to fail. A paralegal job in hell would be better than working here. Please change your management style and yourselves."

168. The content of the message sent on September 18, 2015 ("September 23 Message") directs the Plaintiffs to the Glassdoor Statements.

169. The September 23 Message reflects some of the same content of the Glassdoor Statements.

170. The Defendant sent the September 23 Message.

171. The Defendant used the email address lakhani.erum@yahoo.com to send the September 23 Message.

172. The Plaintiffs perceived these messages as harassment, threats to its business, and further evidence of the Defendant's intention to harm its reputation and business.

Public Perception

173. Since the publication of the Glassdoor Statements, any individual reading the statements might believe that the Plaintiffs engage in questionable client practices.

174. Since the publication of the Glassdoor Statements, any individual reading the statements might believe that the Plaintiffs are unethical in their legal practice.

175. Since the publication of the Glassdoor Statements, any individual reading the statements might believe that the Plaintiffs lack ability in its legal practice.

176. Since the publication of the Glassdoor Statements, any individual reading the statements might believe that the Plaintiffs lack integrity.

177. Since the publication of the Glassdoor Statements, any individual reading the

statements might be prejudiced against the Plaintiffs in their legal services.

178. At least some of the Plaintiffs' colleagues and peers have become aware of and read the Glassdoor Statements.

179. Some of the Plaintiffs' existing and prospective customers have become aware of and read the Glassdoor Statements.

180. Some of the Plaintiffs' potential employees have become aware of and read the Glassdoor Statements.

181. Indeed, the Plaintiffs are in the process of interviewing candidates for an associate attorney position.

182. Numerous interviewees have questioned the credibility of the Plaintiffs based on the Glassdoor Statements.

Intent and Actual Malice

183. The Defendant acted with intent and actual malice when he engaged in the foregoing conduct because he intended to harm the Plaintiffs.

184. The foregoing wrongful conduct engaged in by the Defendant shall hereinafter be referred to as the "Wrongful Conduct."

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COUNT ONE
AS AND FOR A FIRST CAUSE OF ACTION
DEFAMATION PER SE

185. The Plaintiffs hereby incorporate by reference Paragraphs 1 through 184 above in this First Count as though fully set forth herein.

186. The Glassdoor Statements falsely portray the Plaintiffs as an employer that mistreats their employees.

187. The Plaintiffs do not mistreat their employees.

188. The Glassdoor Statements falsely portray the Plaintiffs as acting unprofessionally.

189. The Plaintiffs do not act unprofessionally.

190. The Glassdoor Statements falsely portray the Plaintiffs as engaging in conduct that causes it to be concerned about bar complaints or liability issues.

191. The Plaintiffs do not engage in conduct that causes it to be concerned about bar complaints or liability issues.

192. The Glassdoor Statements falsely portray the Plaintiffs and their attorneys as engaging in professional misconduct.

193. The Plaintiffs and their attorneys do not engage in professional misconduct.

194. The Defendant published the Glassdoor Statements concerning Stahulak & Associates to third parties.

195. The Glassdoor Statements identified Stahulak & Associates by name.

196. Persons other than Stahulak & Associates and the Defendant would have and actually have reasonably understood that the Glassdoor Statements related to and were about Stahulak & Associates.

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197. Some of the Glassdoor Statements identify Stahulak as the owner of Stahulak & Associates. Where not explicitly, the Glassdoor Statements identify Stahulak as the principal and “CEO” given his surname is the firm name.

198. As Stahulak is the owner and principal attorney at Stahulak & Associates, persons other than the Plaintiffs and the Defendant would have reasonably understood that the Glassdoor Statements related to and were about Stahulak.

199. The Glassdoor Statements represent the publication of false and defamatory statements of fact by the Defendant about the Plaintiffs.

200. The Defendant presented the Glassdoor Statements as statements of fact.

201. The Glassdoor Statements prejudice the Plaintiffs in their legal practice.

202. The Glassdoor Statements falsely impute the Plaintiffs lack integrity in their legal practice.

203. The Glassdoor Statements falsely impute the Plaintiffs lack ability in their legal practice.

204. The Defendant made the foregoing statements on and through the Internet.

205. The Glassdoor Statements constituted an unprivileged publication of the defamatory statements by the Defendant to third parties.

206. The Defendant made the Glassdoor Statements with actual malice knowing the falsity of the statements.

207. As a result of the Defendant’s conduct and the publication of the Glassdoor Statements, the Plaintiffs have suffered and continue to suffer damages including, but not limited to, harmed reputation.

208. WHEREFORE, the Plaintiffs seek an award of compensatory and punitive damages arising from the Defendant's *per se* defamation of them.

COUNT TWO
AS AND FOR A SECOND CAUSE OF ACTION
(BY THOMAS STAHULAK)
FALSE LIGHT

209. Plaintiff Stahulak hereby incorporates by reference Paragraphs 1 through 184 above in this Second Count as though fully set forth herein.

210. The Glassdoor Statements cast Stahulak in a false light by falsely claiming he, as the owner of Stahulak & Associates, does not provide a professional working environment for his employees.

211. The Glassdoor Statements cast Stahulak in a false light by falsely claiming he and his firm engage in intentional legal malpractice.

212. The Glassdoor Statements cast Stahulak in a false light by falsely claiming he and his firm engage in professional misconduct.

213. The Defendant published the Glassdoor Statements concerning Stahulak to third parties.

214. The Glassdoor Statements identified Stahulak & Associates by name.

215. Some of the Glassdoor Statements identify Stahulak as the owner of Stahulak & Associates. Where not explicitly, the Glassdoor Statements identify Stahulak as the principal and "CEO" given his surname is the firm name.

216. As Stahulak is the owner and principal attorney at Stahulak & Associates, persons other than the Plaintiffs and the Defendant would have reasonably understood that the Glassdoor Statements related to and were about Stahulak.

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217. Persons other than the Plaintiffs and the Defendant would and actually have reasonably understood that the Glassdoor Statements related to and were about the Plaintiffs.

218. The Defendant made the foregoing statements on and through the Internet.

219. By publishing the Glassdoor Statements on and through the Internet, the Defendant intentionally published the statements to a wide audience.

220. The Glassdoor Statements have prejudiced Stahulak in his legal practice.

221. The Glassdoor Statements have prejudiced Stahulak in his legal practice among existing and potential clients, staff, and colleagues.

222. The Glassdoor Statements made by the Defendant about Stahulak are and would be highly offensive to a reasonable person.

223. The Defendant made the Glassdoor Statements with actual malice, knowing the falsity of the statements contained therein.

224. As a result of the Defendant's casting Stahulak in a false light, Stahulak has suffered and continues to suffer damages including, but not limited to, harmed reputation.

225. WHEREFORE, Plaintiff Stahulak seeks an award of compensatory and punitive damages arising from the Defendant's portrayal of him in a false light.

COUNT THREE

AS AND FOR A THIRD CAUSE OF ACTION

TORTIOUS INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE

226. The Plaintiffs hereby incorporate by reference Paragraphs 1 through 184 above in this Third Count as though fully set forth herein.

227. The Plaintiffs held a reasonable expectancy of entering into valid business relationships with consumers.

228. The Plaintiffs held a reasonable expectancy of entering into valid business relationships with potential employees.

229. The Defendant had knowledge of the Plaintiffs' expectancy of entering into valid business relationships with consumers.

230. The Defendant had knowledge of the Plaintiffs' expectancy of entering into valid business relationships with potential employees.

231. The Defendant published the Glassdoor Statements to harm the Plaintiffs.

232. The Defendant expressly intended to direct consumers away from doing business with the Plaintiffs through publication of the Glassdoor Statements on the Internet.

233. The Defendant expressly intended to direct potential employees away from doing business with the Plaintiffs through publication of the Glassdoor Statements on the Internet.

234. The Defendant made the Glassdoor Statements with the reasonable expectation that prospective clients who read the Glassdoor Statements would not choose the Plaintiffs' services.

235. The Defendant made the Glassdoor Statements with the reasonable expectation that potential employees who read the Glassdoor Statements would not choose to become employed by the Plaintiffs.

236. Indeed, the Glassdoor Statements identified the Plaintiffs by name.

237. The publication of the Glassdoor Statements constitutes an intentional and unjustifiable interference with prospective clients of the Plaintiffs.

238. The publication of the Glassdoor Statements constitutes an intentional and unjustifiable interference with potential employees of the Plaintiffs.

239. The publication of the Glassdoor Statements caused prospective consumers to refrain from contacting and/or doing business with the Plaintiffs.

240. The publication of the Glassdoor Statements caused potential employees to refrain from contacting and/or doing business with the Plaintiffs.

241. As a result of the Defendant's conduct and the publication of the Glassdoor Statements, the Plaintiffs has suffered and continues to suffer damages including, but not limited to, loss of prospective business from prospective clients and potential employees.

242. WHEREFORE, the Plaintiffs seek the following recovery arising from the Defendant's tortious interference with his prospective economic advantage, and injunctive relief in the form of an order:

- A. An award of compensatory damages in an amount to be determined at trial;
- B. An award of punitive damages in an amount to be determined at trial;
- C. Injunctive relief in a form of an order:
 - i. Compelling the Defendant to secure the immediate removal of the Glassdoor Statements and other content about the Plaintiffs on the Internet;
 - ii. Compelling the Defendant to make all reasonable efforts to remove any and all caches of any content he published about the Plaintiffs that may be found on any search engines and cooperate with the Plaintiffs' efforts to do so;
 - iii. Enjoining the Defendant from engaging in any further conduct enabling the Glassdoor Statements to be displayed, distributed, or accessed over the Internet;

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- iv. Enjoining the Defendant from posting false and defamatory statements about the Plaintiffs; and
- v. Compelling the Defendant to engage in any such further conduct necessary to effectuate the foregoing relief.

D. Any such other relief to which the Plaintiffs may be entitled or as justice may require.

GENERAL

243. Where conditions precedent are alleged, the Plaintiffs avers that all conditions precedent have been performed or have occurred.

244. The Plaintiffs demand a jury trial.

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PRAYER FOR RELIEF

WHEREFORE, PLAINTIFFS STAHULAK & ASSOCIATES, L.L.C. AND THOMAS STAHULAK accordingly and respectfully prays for judgment against DEFENDANT JOHN DOE as follows:

1. That PLAINTIFFS STAHULAK & ASSOCIATES, L.L.C. AND THOMAS STAHULAK be awarded compensatory damages in an amount to be determined at trial;
2. That PLAINTIFFS STAHULAK & ASSOCIATES, L.L.C. AND THOMAS STAHULAK be awarded punitive damages in an amount to be determined at trial;
3. That PLAINTIFFS STAHULAK & ASSOCIATES, L.L.C. AND THOMAS STAHULAK be awarded the injunctive relief sought; and
4. That PLAINTIFFS STAHULAK & ASSOCIATES, L.L.C. AND THOMAS STAHULAK be awarded any such other and further relief as this Court may deem just and proper or to which Plaintiff may be entitled as a matter of law and equity.

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Dated: Chicago, Illinois
October 26, 2015

PLAINTIFFS,
STAHULAK AND ASSOCIATES
AND THOMAS STAHULAK

s/Charles Lee Mudd Jr.
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