

IN THE CIRCUIT COURT FOR THE 15th JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

ROBERT J. WOOD, SR.

Plaintiff,

CASE NO.:

vs.

JURY TRIAL DEMANDED

KATHY R. FEINERMAN,

Defendant.

VERIFIED COMPLAINT

COMES NOW the Plaintiff Robert J. Wood, Sr. by and through his undersigned counsel and sues the defendant, Kathy R. Feinerman, "Defendant", and hereby states:

JURISDICTION AND VENUE

1. This is an action for damages that exceed the sum of \$50,000.00 exclusive of interest, cost and attorneys' fees falling under the jurisdiction of the Circuit Court.
2. Plaintiff Robert J. Wood, Sr. resides at 950 7th Ave S. #23 Naples, FL 34102.
3. Defendant is *Sui Juris* and venue is appropriate as the defendant resided in the district at the time of the wrongful actions.
4. The actions given rise to the causes of action in this matter occurred in Palm Beach County, Florida, thus venue is appropriate in this County.

GENERAL ALLEGATIONS

5. Plaintiff and Defendant were in a long-term relationship.
6. Plaintiff was faithful to Defendant.
7. Defendant falsely accused Plaintiff of infidelity in the relationship with multiple women. Including Ellen W, Ardith S, Sarah B, Ellie, Jennifer A, among multiple others.
8. Defendant published these false accusations to multiple parties including friends of both the Plaintiff and Defendant and work associates and caused the reputation of the Plaintiff to be tarnished.
9. These false accusations of infidelity were published to Defendants friend Jayne, and Jayne further repeated the false accusation and affirmatively contacted Ellen and informed her of the false accusation of infidelity.
10. Upon information and belief further publication of the defamatory statements were made to Janine Morris, Lauralee, Judy, Debbie, Diane and Carolyn Mansour, and multiple additional unknown parties to be found through discovery.

COUNT I

Defamation

11. Plaintiff readopts, realleges, and reincorporates paragraphs 1 through 10 as is fully restated herein.
12. Defendant made false and defamatory statements as to Plaintiff's infidelity, and character.
13. Defendant published those false statements to multiple people.

14. Plaintiff was damaged by the false statements, in that his reputation has been sullied, he has suffered alienation, emotional distress, and his ability to work has been compromised.
15. The false statements were made without any reason or evidence and with the malicious intent to hurt Plaintiff and his reputation.
16. The false statements did in fact damage Plaintiff.
17. Upon information and belief Plaintiff also believes that through discovery additional false and defamatory statements will be revealed and reserves the right to amend to set forth same as they become available.

Wherefore, Plaintiff demands judgement in the amount of \$5,000,000.00, incidental and consequential damages, and such other and further relief as the court deems just and proper, court costs, and expenses.

COUNT II

DEFAMATION PER SE

18. Plaintiff readopts, realleges, and reincorporates paragraphs 1 through 10 as is fully restated here in.
19. Defendant made false and defamatory statements as to Plaintiff's infidelity.
20. Defendant published those false statements to multiple people.
21. Statements as to infidelity and unchastity are defamation per se and no showing of damages is necessary.
22. Plaintiff demands statutory damages.

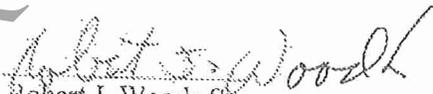
23. The false statements were made without any reason or evidence and with the malicious intent to hurt Plaintiff, and his reputation.

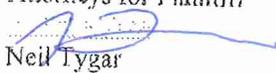
Wherefore, Plaintiff demands judgement in the amount of \$5,000,000.00, incidental and consequential damages, and such other and further relief as the court deems just and proper, court costs, and expenses

VERIFICATION

Under penalty of perjury, I declared that I Have read the foregoing Complaint, and all the facts alleged therein are true and correct to the best of my/our knowledge and belief,

Executed on this 11 day of February, 2025


Robert J. Woods Sr.

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