

NORTH CAROLINA FILED
JOHNSTON COUNTY JUN 28 PM 12:05
SUSAN INGLE DOYLE,
Plaintiff
JOHNSTON COUNTY, C.S.C.

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
FILE NO:

vs.

COMPLAINT FOR CRIMINAL
CONVERSATION

CHRISTI C. STEM,
Defendant

Plaintiff, complaining of Defendant, alleges and says that:

1. Plaintiff is a resident and citizen of Johnston County, North Carolina and has been so for more than six months immediately preceding the institution of this action.
2. Defendant is a resident and citizen of Johnston County, North Carolina.
3. Plaintiff was married to Michael Ross Doyle on or about August 10, 1996 in Buncombe County, North Carolina and they have been husband and wife at all times as set forth herein.
4. During the marriage of the Plaintiff and her spouse, the Defendant became acquainted with Plaintiff's spouse.
5. Defendant, during the marriage of the Plaintiff and her spouse, became a close friend to the Plaintiff.
6. At all times during the marriage between the Plaintiff and her spouse, Defendant was aware of the marriage between the Plaintiff and Plaintiff's spouse.
7. Defendant began, with actual knowledge of this marital relationship between Plaintiff and Plaintiff's spouse, to willfully and deliberately seduce the Plaintiff's spouse. The Defendant, by her actions, wrongfully and maliciously injured the Plaintiff.

8. The Defendant, with actual knowledge of the marital relationship of the Plaintiff and her spouse, and with wrongful and malicious intent did injure, disgrace, distress and humiliate the Plaintiff and deprived the Plaintiff of the company, consortium, society, assistance and services of her spouse by having sexual intercourse with the Plaintiff's spouse during the time that the Plaintiff and her spouse were married and living together and did so on more than one occasion during the Plaintiff's marriage to her spouse.
9. The Defendant has had sexual intercourse with the Plaintiff's spouse throughout 2010 despite the Defendant's knowledge that the Plaintiff and her spouse were married and continuing to live together.
10. The acts of sexual intercourse between Defendant and Plaintiff's spouse have caused the Plaintiff to suffer great mental anguish, humiliation, injury to physical and emotional health and the loss of assistance and financial support of her spouse and have resulted in the Plaintiff suffering actual, substantial damages.
11. The exclusive rights and privileges of the Plaintiff's marriage were invaded and the Plaintiff has suffered shame caused by the loss of the affection of her spouse and the disgrace of the acts as described herein.
12. The marital bed was dishonored, domestic comfort was destroyed and the right to the company, cooperation and aide of Plaintiff's spouse was substantially and actually damaged and lost as a result of Defendant's actions.
13. The Plaintiff's mental anguish, humiliation, loss of consortium, embarrassment, emotional turmoil, injury and loss of assistance have continued, unabated, and will continue, all to the Plaintiff's continuing damage and injury.

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14. By reasons of the acts of sexual intercourse between Defendant and Plaintiff's spouse and the resulting injuries to this Plaintiff, this Plaintiff has suffered damages in excess of Ten Thousand Dollars (\$10,000.00).
 15. The actions of Defendant were intentional, malicious and in reckless disregard for the rights of the Plaintiff and entitle the Plaintiff to punitive damages in excess of Ten Thousand Dollars (\$10,000.00).
 16. All such acts committed by the Defendant as alleged herein were without the knowledge or the consent of the Plaintiff.

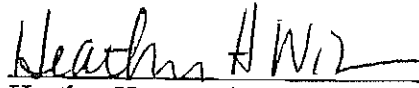
WHEREFORE Plaintiff requests the following:

1. That this complaint be taken as an affidavit in support of all claims and Orders submitted the Plaintiff to the Court.
2. That a sum be awarded as compensatory damages to the Plaintiff for the Defendant's criminal conversation with Plaintiff's spouse in an amount in excess of Ten Thousand Dollars (\$10,000.00).
3. That a sum be awarded as punitive damages to the Plaintiff for the criminal conversation by the Defendant with the Plaintiff's spouse in an amount in excess of Ten Thousand Dollars (\$10,000.00).
4. That all costs of this action be taxed against Defendant.
5. That the Court grant such other and further relief as this Court may deem just and proper
6. That the Plaintiff be granted a trial by jury on all issues so allowable.

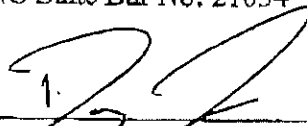
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This the 28 day of JUNE 2011.

HAYES, WILLIAMS, TURNER & DAUGHTRY, P.A.
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