

JDR: sl
2-19-80 00 FEB 25 All: 34
2226A

IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT IN AND FOR DADE
COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION

VINCENTE DOPICO, and)
LOURDES DOPICO, his)
Wife,)
Plaintiffs,)

CASE NO. 80-3446

vs.)

C O M P L A I N T

REVEREND MANUEL ANGEL)
ESPINOSA,)
Defendant.)

45.50
Jas
285026

SECTION CA03

COMES NOW the Plaintiffs, VINCENTE DOPICO and LOURDES DOPICO, his Wife, by and through their under- signed attorneys, and sues the Defendant, REVEREND MANUEL ANGEL ESPINOSA, and alleges:

- 1) That this is an action for damages in excess of TWO THOUSAND FIVE HUNDRED AND NO/100 (\$2,500.00) Dollars.
- 2) That at all times material hereto, the Plaintiffs, VINCENTE DOPICO and LOURDES DOPICO, are over the age of 21 years sui juris, and are residents of Miami, Dade County, Florida.
- 3) That at all times material hereto, the Defendant, REVEREND MANUEL ANGEL ESPINOSA, is over the age of 21 years sui juris, and a resident of Miami, Dade County, Florida.
- 4) That at all times material hereto, the Plaintiffs, VINCENTE DOPICO and LOURDES DOPICO, were and are at the present time lawful husband and wife, sui juris.
- 5) That on or about January 31, 1980, the Defendant, REVEREND MANUEL ANGEL ESPINOSA, scheduled certain press conferences at the Columbus Hotel, in

Miami, Dade County, Florida, at which time he invited members of television, radio, and newspapers to attend.

6) That on the above time and place, said Defendant did maliciously, intentionally, and falsely defame the reputation of the Plaintiffs, VINCENTE DOPICO and LOURDES DOPICO, his wife, by delivering by word of mouth false and untrue statements as follows:

a) That VINCENTE DOPICO directed LOURDES DOPICO to steal confidential files from Jackson Memorial Hospital.

b) That LOURDES DOPICO took said files and other personal records through a psychologist named Elsa Prieto, and took said records to REVEREND MANUEL ESPINOSA.

c) That LOURDES DOPICO has taken these files, which included personal records of Cubans in Miami, Dade County, Florida, and that her records are better than those of the police.

7) That the Plaintiffs have always enjoyed a good reputation for honesty and truthfulness in this community.

8) That as a direct and proximate result of these defamatory remarks, the Plaintiffs' reputations have suffered, their standing in the community has been compromised, their personal standing in the community has been severely undermined; that they have suffered severe emotional and mental distress, and will so both now and in the future.


9) That the Plaintiffs have demanded a retraction of these defamatory remarks by said Defendant, without success.

10) That the Plaintiffs, as a result of

of the Defendant's defamatory remarks, has sustained compensatory and punitive damages in excess of ONE MILLION DOLLARS AND NO/100 (\$1,000,000.00) Dollars.

W H E R E F O R E, Plaintiffs, VINCENTE DOPICO and LOURDES DOPICO, his Wife, demands judgment for damages against the Defendant, REVEREND MANUEL ANGEL ESPINOSA, their costs herein, and further demand trial by jury.

LAW OFFICES OF ROBRISH, MAJOR
& LOGAN, P.A.
Attorneys for Plaintiffs
Suite 206, I.R.E. Group Building
2000 South Dixie Highway
Miami, Florida 33133
Telephone: 858-6373

BY 
JOEL D. ROBRISH