

IV.

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That such acts on behalf of the Defendant were intentional, deliberate, wanton, willful, without just cause or provocation which constitute an intentional assault and battery upon the Plaintiff.

V.

That as a direct and proximate result of the intentional, deliberate, wanton and willful acts of the Defendant, Plaintiff sustained severe fractures of her left tibia and fibula, damages to her foot and substantial injuries and disfigurement to her face, head, body, and leg, which were all severely bruised and injured, all of which required substantial medical treatment, administration of drugs, treatment by doctors, x-rays and hospitalization, and that further, the Plaintiff sustained extreme pain and suffering and upon information and belief has sustained permanent injuries as a direct and proximate result of Defendant's acts.

VI.

That the Plaintiff additionally sustained the loss of employment.

VII.

That as a direct and proximate result of the damages sustained as hereinbefore alleged, Plaintiff was damaged in the amount of Fifty Thousand and 00/100 (\$50,000.00) Dollars actual damages plus punitive damages in an amount to be determined by the Court.

*1/7/81*