

REPUBLIC OF THE PHILIPPINES)

Province Of \_\_\_\_\_) S.S.

City/Municipality Of \_\_\_\_\_

x-----x

COMPLAINT AFFIDAVIT

I, \_\_\_\_\_, of legal age, single, Filipino citizen and a resident of \_\_\_\_\_ after having been duly sworn according to law hereby depose and say:

1. That defendant Julio Jose is of legal age, single, Filipino citizen and resident of 3456 Gitnang-Liko Street, Paco Manila.

2. That the plaintiff works as a paralegal for Walang Lokohan Law Office with an office located at 678 Marupok Street, Makati City as evidenced by ANNEX ‘A’.

3. That the defendant is a security guard for the same company as evidenced by ANNEX ‘B’.

4. That on or about 10:30 in the evening of February 14, 2014, in the City of Makati, Philippines, the said accused, with lewd designs, did then and there willfully, unlawfully and feloniously abducted me while coming out of a toilet in my office by means of force, violence and intimidation by pulling me and forcing me to walk at the parking lot of the same office with a gun pointed at the top of my head and hearing death threats from the defendant should I disobey his wishes.

5. He succeeded in bringing me into his car which is a Toyota Corolla ’98 with plate number TYU 789, and brought me to his house where the said accused tried to force me to have sexual intercourse and marry him on several occasions but stops when I start crying.

6. He was able to abduct me for three days leaving me with no means of communication and locking the door of the house when he goes to work.

7. Eventually, I was able to escape with a help of his landlord named Augusto Celis.

RELIEF

WHEREFORE, premises considered, it is most respectfully prayed unto this Honorable Court that, after hearing, judgment be rendered ordering the defendant:

1. To pay moral damages

2. To pay the plaintiff actual damages for the days that I was not able to go to work

3. To pay the plaintiff the cost of the suit;

4. Such other relief as the court may deem proper.

City of Manila, February 20, 2014.

FADERUGAO-FORTALEZA LAW OFFICE

Counsel for the Plaintiff

Unit 123, Victoria Tower I

Taft Avenue, Manila

By:

\_\_\_\_\_

Roll of Attorney No. \_\_\_\_\_

IBP No. \_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_

PTR No. \_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_

CERTIFICATION OF NON-FORUM SHOPPING

Republic of the Philippines)

Province of \_\_\_\_\_) S.S.

City/Municipality of \_\_\_\_\_)

x-----x

I, \_\_\_\_\_, of legal age, Filipino, (single / married / widow), and a resident of \_\_\_\_\_, Philippines, after being sworn in accordance with law, hereby depose and certify that:

1. I have not theretofore commenced any other action or proceeding or filed any claim involving the same issues or matter in any court, tribunal, or quasi-judicial agency and, to the best of my knowledge, no such action or proceeding is pending therein; (c) if I should thereafter learn that the same or similar action or proceeding has been filed or is pending before the Supreme Court, the Court of Appeals, or any other tribunal or quasi-judicial agency, I undertake to report such fact within five (5) days therefrom to the court or agency wherein the original pleading and sworn certification contemplated herein have been filed.

IN WITNESS WHEREOF, I have hereunto set my hand this \_\_\_\_\_ at \_\_\_\_\_, Philippines.

\_\_\_\_\_

AFFIANT

SUBSCRIBED AND SWORN to before me, this \_\_\_\_\_, by \_\_\_\_\_ who exhibited to me (his/her) Community Tax Certificate No. \_\_\_\_\_ issued at \_\_\_\_\_, Philippines on \_\_\_\_\_.

Notary Public

Doc. No. \_\_\_\_\_;

Page No. \_\_\_\_\_;

Book No. \_\_\_\_\_;

Series of 20\_\_\_\_;