

46. Defendant Charbonneau, through the Libelous Statements, intended to lower the esteem of the Plaintiffs in the minds of right-thinking members of society and expose the Plaintiffs to hatred, contempt and ridicule.
47. Defendant Charbonneau's conduct *vis á vis* the Plaintiffs is high-handed, outrageous, and is directed to *inter alia* violate the Plaintiffs' autonomy as well as the Plaintiffs' ability to make a living free of intentional interference in economic relationships between the Plaintiffs and the public at large.
48. Apart from the defamatory and libelous meaning of the Defendants' publications as set out above, it carries the additional sting that the Plaintiffs are:
  - (a) not law abiding citizens or a corporation that operate outside the parameters of the law;
  - (b) without any moral fibre;
  - (c) not trustworthy;
  - (d) illiterate;
  - (e) incompetent; and
  - (f) underhanded
49. The Libelous Statements have injured and continue to cause injury to the Plaintiffs' professional reputation
50. As a result of the Defendants' conduct set out above, the Plaintiffs suffered and continue to suffer loss and damages, particulars of which are as follows:
  - (a) damage to the reputation and dignity;
  - (b) stress, anxiety, loss of health and hardships;
  - (c) humiliation, repulsion, embarrassment and emotional suffering;
  - (d) wounded pride, damage to self-confidence and self-esteem; and
  - (e) comprehensive damages and other related damages.