

**MARYLAND CIRCUIT COURT
BALTIMORE CITY**

MITUL R. PATEL,

Plaintiff,

vs.

MATHEW CHAN,

Defendants.

No. 24-CV003573

COMPLAINT

For his claims for relief against Defendant, Plaintiff Mitul R. Patel ("Plaintiff") alleges as follows:


PARTIES, JURISDICTION AND VENUE

1. Plaintiff maintains a primary residence in Gwinnett County, Georgia.
2. Defendant Mathew Chan ("Defendant") maintains a primary residence located in Baltimore County, Maryland.
3. Defendant's actions, upon which the allegations in this Complaint are based, were performed in this judicial district.
4. Therefore, upon information and belief, jurisdiction and venue are proper in this Court.

**COUNT I
DEFAMATION**

5. On 10/01/2015, Defendant posted false and defamatory statements on the internet at the following web address's: <http://www.healthgrades.com/dentist/dr-mitul-patel-3kvwh> , <https://www.ratemds.com/doctor-ratings/2637312/Dr-MITUL%2BR.-PATEL-SUWANEE-GA.html> , <http://www.kudzu.com/m/DrMitul-PatelDDS-30366893> , <http://www.yelp.com/biz/family-and-cosmetic-dental-care-suwanee-2> , <https://www.doctor-oogle.com/584293-suwanee-dentist-dr-mitul-patel> , <https://www.doctor-oogle.com/584293-suwanee-dentist-dr-mitul-patel>. (the "Defamation").
6. The Defamation was made by Defendant about and concerning Plaintiff.
7. Without privilege, Defendant communicated the Defamation to third parties through the Internet to world at large, without limitation.
8. The Defamation made by Defendant impeaches the honesty, integrity and reputation of Plaintiff by implying that Plaintiff is involved in a fraudulent scheme.
9. The Defamation is and would be highly offensive to a reasonable person.
10. The Defamation is and will continue to cause harm to Plaintiff's reputation unless it is restrained and enjoined.

Dated, so respectfully, this 8 day of February, 2016



Mitul R. Patel
276 Peachtree Pkwy.
Suwanee, GA 3002

Pro Per Plaintiff