Jane Doe

123 Any Street PLAINTIFF

Regina SK S1S 0S0

John Smith

987 Main Avenue DEFENDANT

Regina SK S2S 1P1

STATEMENT OF PLAINTIFF’S CLAIM

1. The Plaintiff, Jane Doe, resides at or near Regina, Saskatchewan.
2. The Defendant, John Smith, resides at or near Regina, Saskatchewan.
3. The Plaintiff brings this action pursuant to, and specifically pleads and relies on, *The Privacy Act*, which will be referred to in this claim as the ‘*Act*’.
4. On or about [date and year] an intimate image, as that term is defined in the *Act*, was made of the Plaintiff. It was recorded in circumstances that gave rise to a reasonable expectation of privacy and it was threatened to be distributed and/or distributed by the Defendant, and/or others acting for, or at the direction of, the Defendant.
5. The Plaintiff did not consent to this distribution and says that the distribution was done by the Defendant either knowing that the Plaintiff did not consent to its distribution or in circumstances where the Defendant recklessly assumed that the Plaintiff had consented to its distribution.
6. The Plaintiff pleads that this non-consensual distribution of an intimate image is not in the public interest.
7. The Plaintiff says that the actions of the Defendant constitute a tort within the meaning of the *Act* and seeks the following relief:
8. a declaration that the intimate image is unlawful;
9. an order that the Defendant make every reasonable effort to make the image unavailable including by having it removed from internet platforms and de-indexed from internet search engines;
10. general, special, aggravated and punitive damages in an amount to be proven at the trial of this action;
11. an accounting of, and recovery of, any profits that may have accrued to the defendant by reason of the Defendant’s actions;
12. prejudgment interest on any monies ordered to be paid to the Plaintiff;
13. the legal costs of these proceedings in an amount to be proven at trial, or as this Honorable Court considers to be just and reasonable; and
14. any other order that this honorable Court considers to be just and reasonable in the circumstances.

Dated at \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, Saskatchewan, this \_\_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_, 20\_\_.

*[Plaintiff’s signature = Jane Doe]*