

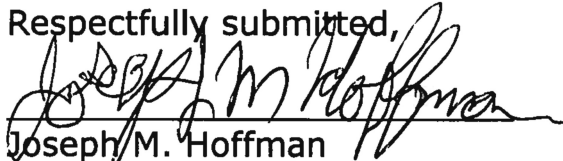
3. As a disabled veteran whose lungs were damaged from the Afghanistan burn pits, Plaintiff is hyper sensitive to mold, mildew, dust, certain household chemicals, etc. He had been unable to occupy his condo for an extended period of time.

4. In addition to threatening Plaintiff's health and well being by failing or refusing to repair the internal water infiltration cause(s), Plaintiff had suffered great financial losses seeking alternative housing coupled with the financial stress of being unemployed because of a heart attack.

5. Justice demands that Plaintiff be fully compensated for his injuries!

6. Additionally with higher *ad damnum* amounts an attorney may elect to represent Plaintiff in this action.

WHEREFORE Plaintiff moves this Court to grant him leave to amend the damages sought against the Defendant and for such other and necessary relief deemed just and necessary.

Respectfully submitted,

Joseph M. Hoffman
Plaintiff in proper person

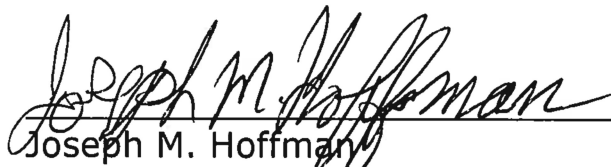
Joseph M. Hoffman
Plaintiff in proper person
6621 Wakefield Drive #211
Alexandria, VA 22307
Telephone (937) 582-5339

AFFIDAVIT OF SERVICE

I, Joseph M. Hoffman, doth hereby affirm that Plaintiff's Motion for Leave to File Amended Complaint with is accompanying Memorandum in Support and attached proposed Plaintiff's Circuit Court/amended Complaint were sent to

Kathryn G. Murphy - Attorney
Whiteford, Taylor & Preston, L.L.P.
3190 Fairview Park Drive - Suite 800
Falls Church, VA 22042-4510

via both email to kmurphy@whitefordlaw.com as well as FAX to (703) 259.6534 on the 13th day of December, 2023.



Joseph M. Hoffman
Plaintiff in proper person

IN THE CIRCUIT COURT OF FAIRFAX COUNTY - VIRGINIA

JOSEPH M. HOFFMAN

Plaintiff,

versus,

**RIVER TOWERS CONDOMINIUM
UNIT OWNERS ASSOCIATION INC.**

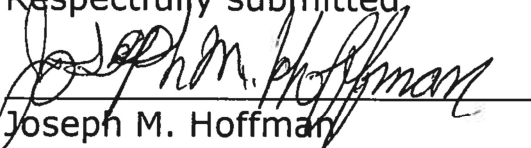
Defendant.

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**MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF
PLAINTIFF’S MOTION FOR LEAVE TO FILE AMENDED COMPLAINT**

1. Rule 1:8.

2. Plaintiff asserts that Defendant will not be prejudiced by Plaintiff seeking leave to seek just compensation since the facts have not changed. Plaintiff asserts that what is paramount is that Plaintiff be compensated fully by any of the Defendants acts or omissions. *See, e.g. Peterson v. Castano, 260 Va. 299, 534 S.E.2d 736 (2000).*

Respectfully submitted,

Joseph M. Hoffman
Plaintiff in proper person