

IN THE \_\_\_\_\_ COURT OF THE STATE OF \_\_\_\_\_

IN AND FOR THE COUNTY OF \_\_\_\_\_

\_\_\_\_\_,  
Plaintiff,

v. Case No. \_\_\_\_\_

\_\_\_\_\_,  
Defendant.

\_\_\_\_\_/

### COMPLAINT

Plaintiff, \_\_\_\_\_, by and through undersigned counsel, hereby files this Complaint against Defendant, \_\_\_\_\_, and alleges as follows:

#### I. PARTIES

1. Plaintiff, \_\_\_\_\_, is an individual residing at:

Street Address: \_\_\_\_\_

Unit Number (if applicable): \_\_\_\_\_

City: \_\_\_\_\_

State: \_\_\_\_\_

Zip Code: \_\_\_\_\_

2. Defendant, \_\_\_\_\_, is an individual residing at:

Street Address: \_\_\_\_\_

Unit Number (if applicable): \_\_\_\_\_

City: \_\_\_\_\_

State: \_\_\_\_\_

Zip Code: \_\_\_\_\_

or is a \_\_\_\_\_ (e.g., corporation, LLC) organized under the laws of the State of \_\_\_\_\_, with its principal place of business located at:

Street Address: \_\_\_\_\_

Unit Number (if applicable): \_\_\_\_\_

City: \_\_\_\_\_

State: \_\_\_\_\_

Zip Code: \_\_\_\_\_

## II. JURISDICTION AND VENUE

3. This Court has subject matter jurisdiction over this action pursuant to

\_\_\_\_\_.

4. Venue is proper in \_\_\_\_\_ County, \_\_\_\_\_, because

\_\_\_\_\_.

## III. FACTUAL ALLEGATIONS

5. On or about \_\_\_\_\_, 20 \_\_\_\_\_, Plaintiff and Defendant \_\_\_\_\_.

6. Defendant \_\_\_\_\_.

7. As a direct and proximate result of Defendant's actions, Plaintiff has suffered

\_\_\_\_\_.

8. Plaintiff has incurred, and will continue to incur, damages including, but not limited to, \_\_\_\_\_ .

**IV. CAUSES OF ACTION**

**COUNT I:** \_\_\_\_\_

9. Plaintiff re-alleges and incorporates by reference the allegations contained in paragraphs 1 through 8 as if fully set forth herein.

10. Defendant's actions, as described above, constitute \_\_\_\_\_ .

11. As a direct and proximate result of Defendant's \_\_\_\_\_ , Plaintiff has suffered damages in an amount to be proven at trial, but believed to be in excess of the jurisdictional minimum of this Court.

**COUNT II:** \_\_\_\_\_

12. Plaintiff re-alleges and incorporates by reference the allegations contained in paragraphs 1 through 11 as if fully set forth herein.

13. Defendant's actions, as described above, further constitute \_\_\_\_\_ .

14. As a direct and proximate result of Defendant's \_\_\_\_\_ , Plaintiff has suffered damages in an amount to be proven at trial, but believed to be in excess of the jurisdictional minimum of this Court.

**V. PRAYER FOR RELIEF**

WHEREFORE, Plaintiff, \_\_\_\_\_ , respectfully requests that this

Honorable Court enter judgment against Defendant, \_\_\_\_\_, and grant the following relief:

- a. Award Plaintiff compensatory damages in an amount to be determined at trial;
- b. Award Plaintiff pre-judgment and post-judgment interest at the highest rate allowed by law;
- c. Award Plaintiff the costs of this action, including reasonable attorney's fees; and
- d. Grant such other and further relief as this Court deems just and proper.

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

Respectfully submitted,

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**Signature**

**Printed Name:** \_\_\_\_\_

**Bar No. (if applicable):** \_\_\_\_\_

**Attorney for Plaintiff / Plaintiff, Pro Se**

**Street Address:** \_\_\_\_\_

**City:** \_\_\_\_\_

**State:** \_\_\_\_\_

**Zip Code:** \_\_\_\_\_

**Phone:** \_\_\_\_\_

**Email:** \_\_\_\_\_

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Complaint has been furnished to the Defendant(s) by \_\_\_\_\_ (e.g., U.S. Mail, hand delivery, certified mail) on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_.

**Recipient:** \_\_\_\_\_

**Address:** \_\_\_\_\_

**Method of Service:** \_\_\_\_\_

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Signature