

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

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

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

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

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

## COMPLAINT FOR QUIET TITLE

Plaintiff, \_\_\_\_\_, by and through undersigned counsel, files this Complaint for Quiet Title against Defendant, \_\_\_\_\_, and states as follows:

### I. JURISDICTION AND VENUE

1. This Court has jurisdiction over the subject matter of this action pursuant to \_\_\_\_\_.
2. Venue is proper in this County because the real property that is the subject of this action is located within this County, pursuant to \_\_\_\_\_.

**II. PARTIES**

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

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

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

4. Defendant, \_\_\_\_\_, is an individual/entity residing at/with a principal place of business at:

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

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Defendant claims an interest in the real property described herein adverse to Plaintiff's interest.

**III. PROPERTY DESCRIPTION**

5. The real property that is the subject of this action (hereinafter, "the Property") is legally described as:

\_\_\_\_\_

6. The street address of the Property is:

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

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

\_\_\_\_\_

**IV. FACTUAL ALLEGATIONS**

7. Plaintiff is the owner in fee simple of the Property described above, having acquired title by \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

8. Plaintiff has been in continuous, open, notorious, exclusive, and adverse possession of the Property, or has held record title to the Property, since \_\_\_\_\_ .

9. Defendant claims an interest in the Property adverse to Plaintiff's ownership. The nature of Defendant's adverse claim is:

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10. Defendant's claim is without any right whatsoever, and Defendant has no estate, right, title, lien, or interest in the Property, or any part thereof.

11. Plaintiff desires to have the title to the Property quieted against the claims of Defendant.

## **V. CAUSE OF ACTION - QUIET TITLE**

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

13. Plaintiff is the rightful owner of the Property and is entitled to have the title to the Property quieted in Plaintiff's name against any and all claims of Defendant.

14. Defendant's claims constitute a cloud upon Plaintiff's title, diminishing its marketability and interfering with Plaintiff's full enjoyment of the Property.

15. Plaintiff has no adequate remedy at law and requires the equitable intervention of this Court to remove the cloud on title and quiet title in Plaintiff's favor.

## **VI. PRAYER FOR RELIEF**

**WHEREFORE, Plaintiff respectfully requests that this Court enter judgment against Defendant as follows:** a. That the Court declare Plaintiff to be the sole and exclusive owner in fee simple of the Property described herein.

b. That the Court declare that Defendant has no right, title, interest, lien, or claim in or to the Property.

c. That the Court permanently enjoin Defendant, and all persons claiming by, through, or under Defendant, from asserting any claim to the Property adverse to Plaintiff.

d. That the Court award Plaintiff the costs of this action, including reasonable attorney's fees, as permitted by law.

e. For such other and further relief as the Court deems just and proper.

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

Respectfully submitted,

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**Signature**

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

**Bar No.:** \_\_\_\_\_

**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 FOR QUIET TITLE has been furnished to the Defendant(s) at the address(es) listed below, by

\_\_\_\_\_ (method of service), this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_.

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

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

Signature of Filer