

IN THE CHANCERY COURT OF COUNTY, MISSISSIPPI

PLAINTIFF

VS.

NO.

DEFENDANTS

COMPLAINT

COMES Plaintiff, and files this Complaint against Defendants, and would state in support thereof the following:

1. Plaintiff, is a Mississippi Corporation whose address is Post Office Box , Mississippi. Defendants, are residents of County, Mississippi, who may be served with process at

2. On or about Plaintiff and Defendants verbally agreed to the renovation of Defendants' home located at Mississippi, by Plaintiff on the basis of cost plus percent (%).

3. On or about a building permit was granted by the and construction on the residence of Mr./Ms. began.

4. At all times during the construction of said house, Plaintiff performed all work and services at the direction and instructions of Defendants.

5. Plaintiff has performed work on said residence in a total amount of DOLLARS (\$) and Defendants have only paid Plaintiff the sum of DOLLARS (\$) for a balance owed of DOLLARS (\$)

6. Plaintiff has filed a construction lien on said property as recorded in Construction Lien Book at Page , said property being more particularly described as follows:

[DESCRIPTION]

7. A dispute has arisen by and between Plaintiff and Defendants as to the terms of the verbal agreement and any modifications thereto, and Plaintiff requests that the Court construe, determine and interpret the parties' agreement in equity.

8. Plaintiff further requests that the Court enter an order awarding unto Plaintiff, damages in the amount of DOLLARS (\$) and further awarding foreclosure of the construction lien recorded in Book at Page in the Construction Lien Records at the office of the Chancery Clerk of County, Mississippi, and awarding Plaintiff's attorneys fees and other costs of pursuing this action in accordance with law.

WHEREFORE, PREMISES CONSIDERED, Plaintiff, requests that the Court enter an order awarding unto Plaintiff the following relief: (a) construction and interpretation of the parties' contract in equity, (b) judgment against Defendants, , awarding Plaintiff damages in the amount of DOLLARS (\$) , (c) foreclosure of the construction lien recorded in Book at Page in the Construction Lien Records of County, Mississippi.

Respectfully submitted,

Attorney for