

IN THE CIRCUIT COURT OF                      COUNTY, MISSISSIPPI

APPELLANT

NO.

APPELLEE

COMPLAINT

1.

is a community hospital organized and existing under the laws of the State of Mississippi, and files this Complaint by its governing body, the Board of Trustees.

2.

, an adult resident citizen of                      County, and may be personally served with copies of this Complaint and the Summons                      , Mississippi.

3.

owns a certain office building located at                      in the City of                      , County, Mississippi.

4.

By written agreement dated                      ,                      ,                      leased the above described premises to                      for a term of                      years, commencing on                      ,                      , and terminating on                      ,                      . The lease provided for equal monthly installments of \$                      , payable in advance on the                      day of each month. A copy of the lease is attached hereto as Exhibit A and incorporated herein by reference.

6.

By letter dated                      ,                      ,                      made written demand on                      to vacate the premises and surrender possession thereof to                      .                      refused and failed to do so and still holds possession of the premises without permission to consent, express or implied. A copy of the letter is attached hereto as Exhibit B and incorporated herein by reference.

7.

has performed all conditions precedent to the payment of rent by                      .

8.

is now liable for double rent, pursuant to Miss. Code Ann. 89-1-25, in equal monthly installments of \$ , commencing on , , and continuing until vacates the premises and Surrenders possession thereof to . There is now due and owing from for double rent from the period of , to , a total of \$ .

9.

In the alternative, 's failure to vacate the premises on , , constitutes unjust enrichment and has caused actual damages to . There is now due and owing from for unjust enrichment and actual damages, from the period of , to , , a total of \$ . Additional unjust enrichment and actual damages will be due from and after , , so long as refuses to vacate the premises and surrender possession thereof to .

requests that the Court enter judgment as follows:

1. Judgment for for double rent in the amount of \$ , plus pre-judgment Interest and court costs, and such other relief as the Court deems appropriate in the circumstances, or in the alternative,
2. Judgment for for unjust enrichment and actual damages in the amount of \$ , plus attorneys' fees and expenses of this litigation, plus pre-judgment interest court costs and such other relief as the Court deems appropriate in the circumstances.

This the day of , 20 .

Respectfully submitted,

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Attorney for

Of Counsel:

Telephone:  
MSB #  
Attorney for