

**JOHN LAWYER, ESQ.
12 MAIN STREET
ANYWHERE, USA
Attorneys for Plaintiff**

**ABC ASSOCIATES,
INC.,**

Plaintiff,

vs.

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
[insert] COUNTY
SPECIAL CIVIL PART**

Docket No.

JANE SMITH AND JOHN SMITH,

Defendant.

**CIVIL ACTION
COMPLAINT**

**Plaintiff, ABC Associates, Inc., doing business at [insert address], by way of
Complaint herein says:**

FIRST COUNT

- 1 The Plaintiff is a corporation of the State of New Jersey, whose principal, John Doe, M.D., is a licensed physician pursuant to the laws of the State of [insert], specializing in the area of [insert nature of practice/business].
- 2 Upon information and belief the Defendants are United States citizens and residents of [insert] County maintaining their principal residence at [insert address].
- 3 On [insert date], the Defendants, Jane Smith and John Smith delivered to Plaintiff a check drawn from an account at the [insert bank] for the sum of \$[insert], (check number [insert]).
- 4 On [insert date] the Defendants, Jane Smith and John Smith delivered to Plaintiff a check drawn from an account at the [insert bank] for the sum of \$[insert], (check number [insert]).
- 5 On [insert date] the Defendants, Jane Smith and John Smith delivered to Plaintiff a check drawn from an account at the [insert bank] for the sum of \$[insert], (check number [insert]).

6 The Plaintiff presented the above three (3) checks to said bank for payment but was refused payment on all three checks. In accordance with N.J.S.A. 2A:32A-1, the Plaintiff sent Defendants a form of demand for payment for all three dishonored check, a true copy of which is attached hereto as **Exhibit 1**. These notices were sent to the Defendants by certified mail, return receipt requested to the Defendants= last known address, namely; [insert address].

7 The Defendants have failed to repay the above amounts in cash or by cashiers check or certified check within 35 days after the date of demand for payment of dishonored check was mailed to them.

8 Pursuant to law, specifically N.J.S.A. 2A:32A-1, the Plaintiff is entitled to damages as follows.

9 As to check number [insert] in the amount of \$[insert], treble damages of **\$(insert)**.

10 As to check number [insert] in the amount of \$[insert], treble damages of **\$(insert)**.

11 As to check number [insert] in the amount of \$[insert], treble damages of **\$(insert)**.

12 In addition to the foregoing damages the Plaintiff is entitled to statutory mandated attorney=s fees.

WHEREFORE, Plaintiff demands judgment against the Defendants, Jane Smith and John Smith, in the amount of \$[insert], plus statutorily awarded attorney's fees, court costs and interest.

DATED:

JOHN LAWYER

CERTIFICATION

I certify the matter in controversy is not the subject of any other action or arbitration proceeding, now or contemplated, and no other parties should be joined in this action. R. 4:5-1.

DATED:

JOHN LAWYER

TRIAL DESIGNATION

John Lawyer, Esq. is hereby designated as trial counsel.

DATED:

JOHN LAWYER