

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

**ABC COMPANY, INC.**

**Plaintiff,**

**v.**

**JOHN DOE AND JANE DOE,**

**Defendants.**

**SUPERIOR COURT OF NEW JERSEY  
[insert] COUNTY  
CHANCERY DIVISION-GENERAL  
EQUITY**

**DOCKET NO. \_\_\_\_\_**

**CIVIL ACTION**

**VERIFIED COMPLAINT**

**Plaintiff, ABC Company, Inc., maintaining its place of business at [insert address],  
in the [insert] of [insert], State of [insert], by way of verified complaint against the  
defendants, says:**

**THE PARTIES**

4576. Plaintiff is an extended stay facility and a [insert] Corporation and it operates [insert] facilities in [insert] states throughout the domestic United States. Plaintiff essentially offers extended hotel service to members of the public in exchange for compensation. The number of units in each facility operated by plaintiff vary however, all units are owned by plaintiff or a subsidiary thereof. No units may be purchased by any member of the public. Typically, members of the public pay compensation for Aextended stays@ at any of plaintiff=s facilities.

4577. Defendants are, upon information and belief, United States citizens, residents of the State of New Jersey, and, husband and wife.

**EJECTMENT**

4578. On or about [insert date], defendants executed a registration card so that they could stay at plaintiff=s [insert] facility which is located at [insert address]

4579. Pursuant to this registration card, defendants were obligated to pay a weekly amount of \$ [insert] to plaintiff for the use of the facility and more particularly, Room [insert] therein.

4580. The parties do not maintain a landlord-tenant relationship; instead, defendants are guests within plaintiff=s [insert] facility.

4581. During their length of stay, defendants have been disruptive and acted in a disorderly fashion towards plaintiff=s employees and managerial staff by either making unreasonable customer demands, invading their privacy, trespassing into areas in which guests such as defendants are not permitted to enter, and/or annoying and harassing said employees and staff to the point that plaintiff=s business has been disrupted, the employees= performance has been affected, or, their actions have caused undue stress on plaintiff=s personnel.

4582. Defendants have also been disruptive and acted in a disorderly fashion to plaintiff=s customers thus causing a disturbance at plaintiff=s [insert] facility.

4583. Defendants= actions have damaged plaintiff and cannot be remedied by the awarding of monetary damages.

4584. There is no dispute that plaintiff is the rightful owner of its premises and accordingly, plaintiff has the exclusive right and entitlement to possession of its [insert] facility at [insert address].

4585. There is good cause to eject defendants from plaintiff=s [insert] facility located at [insert] and to bar their return to the facility.

**WHEREFORE**, plaintiff demands judgment against the defendants:

- a. Permanently ejecting them from plaintiff=s facility at [insert address];
- b. Permanently restraining them from contacting or attempting to contact any of plaintiff=s employees or servants through any mode of communication either at plaintiff=s [insert]

facility at [insert address] or at their personal residences; and

- c. For costs, interest, counsel fees any other relief the court deems is just and necessary.

### **DESIGNATION OF TRIAL COUNSEL**

Pursuant to R. 4:25-4, John Lawyer, Esq., is hereby designated as trial counsel in the within matter for the plaintiff.

### **CERTIFICATION**

Pursuant to R. 4:5-1, I hereby certify that the matter in controversy is not the subject of any other action pending in any court or a pending arbitration proceeding; and further that no other action or arbitration proceeding is contemplated; and further that there are no other parties who should be joined in this action.

Dated:

\_\_\_\_\_  
JOHN LAWYER, ESQ.

### **VERIFICATION**

STATE OF NEW JERSEY :

ss.:

COUNTY OF MONMOUTH:

James Doe, of full age, being duly sworn, according to law, upon his oath deposes and says:

1. I am a District Manager of plaintiff in the foregoing Complaint.
2. I hereby certify that the allegations contained in the foregoing Complaint are true to the best of my knowledge and belief. I am aware that if any statements made by me are willfully

false, I am subject to punishment.

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James Doe

Sworn and subscribed to before me  
this    day of            , 2004.

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Notary Public