

IN THE _____ COURT OF _____ (County), _____ (State)
_____, INC. PLAINTIFF
V. CAUSE NO. 000,0000
_____ DEFENDANT

COMPLAINT

COMES NOW Plaintiff _____, *Inc.*, (____) in the above-styled and numbered cause, by and through its attorneys, and files this its Complaint against Defendant, _____ (____), and in support thereof would show unto the Court the following matters and facts:

1. _____ is a corporation organized and existing under the laws of the state of _____, with its principal office located at _____
(*street address, city, county, state, zip code*).
2. Defendant _____ is an adult resident citizen of _____ (*city, county, state*), and may be served with process and other writs of this Court at his place of residence located at _____ (*street address, city, county, state, zip code*).
3. On or about _____ (*date*) in _____
(*location where parties entered into contract*), Plaintiff and Defendant entered into a written agreement, a copy of which is attached hereto as **Exhibit A** and made a part hereof. According to paragraph ____ of the contract, the Defendant promised to _____
(*describe Defendant's promises*).
4. The consideration set forth in the agreement was fair and reasonable.
5. Plaintiff has performed all conditions, covenants, and promises required by it on its part to be performed in accordance with the terms and conditions of the contract.

6. On or about _____ (***date***), the Defendant breached the contract by _____
_____ (***describe circumstances of breach***).

7. By reason of Defendant's breach of the contract, the Plaintiff has suffered damages in the
_____ (***amount***).

8. By the terms of the contract, the Plaintiff is entitled to recover its reasonable attorney fees incurred in the enforcement of the provisions of the contract. By reason of the Defendant's breach, the Plaintiff has been forced to secure the services of _____
(***name of firm or attorney***) to prosecute this lawsuit.

WHEREFORE, plaintiff prays judgment against Defendant as follows:

1. For compensatory damages in the sum of \$ _____;
2. For interest on the sum of \$ _____ from and after _____ (***date***), to date of judgment;
3. For reasonable attorney's fees according to proof;
4. For costs of suit herein incurred; and
5. For such other and further relief as the court may deem proper.

Respectfully submitted,

_____, INC.

By: _____

(***Name of Attorney***)

State Bar No. _____

One of Its Attorneys

OF COUNSEL:

Name of Attorney

Address of Attorney

Telephone: _____