

IN THE _____ COURT OF _____ (County), _____ (State)

_____, INC.

PLAINTIFF

V.

CAUSE NO. _____

DEFENDANT

COMPLAINT

COMES NOW _____, Inc., Plaintiff 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:

I. Plaintiff 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).

II. Defendant resides at of _____ (street address, city, county, state, zip code).

III. Plaintiff owns in fee the premises _____ (Premises) located at _____ (street address, city, county, state, zip code), and more particularly described as follows:

_____ (legal description).

IV. By written agreement dated _____ (date), Plaintiff leased the Premises to Defendant for a term of _____ (number of months or years), terminating on _____ (date). A copy of the Lease is attached as **Exhibit A**, and made a part of this pleading.

V. On or about _____ (date), Defendant took possession of the Premises pursuant to the Lease and thereafter paid the rents until _____ (date).

VI. Defendant failed to pay the \$_____ rent due under the Lease on _____ (date), and despite Plaintiff's demand on Defendant for payment, Defendant has failed to pay any part of the rent.

VII. Defendant owns, uses, and/or keeps the following-described personal property on the leased premises: _____ (Describe personal property).

VIII. This personal property is not located in a dwelling house, apartment, or other place used exclusively as a home or residence for Defendant and Defendant's family, and the property is not exempt from execution.

IX. By virtue of _____ (***cite applicable statute***), Plaintiff has a lien on the said personal property for the \$_____ rent due Plaintiff from Defendant and unpaid for the leased premises.

WHEREFORE, Plaintiff requests:

1. Judgment against Defendant for \$_____, with interest at the rate of _____% per annum from _____ (***date***);
2. A declaration from this honorable Court that Plaintiff has a lien on Defendant's personal property described above for \$_____, pursuant to _____ (***cite applicable statute***);
3. Foreclosure of the lien as determined in this action against Defendant's described personal property and by its sale in the manner provided by law, with application of the proceeds of the sale to the satisfaction of Plaintiff's lien;
4. Judgment against Defendant for any deficiency that may remain after the sale of the personal property and application of the proceeds of the sale to the satisfaction of Plaintiff's lien;
5. Award to Plaintiff of costs and disbursements incurred in this proceeding; and
6. Such other and further relief as the Court deems fit and proper.

Respectfully submitted,

_____, INC.

By: _____

State Bar No. _____

One of Its Attorneys

OF COUNSEL:

_____ (**Telephone**)

(Name of Law Firm)
(Address)
(City, State and Zip Code)