

Complaint for Conversion of Property Left for Repair

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

PLAINTIFF

V.

CAUSE NO.

DEFENDANT

COMPLAINT

COMES NOW _____, Plaintiff in the above-styled and numbered cause, by and through his attorneys, and files this his Complaint against Defendant, _____, and in support thereof would show unto the Court the following matters and facts:

1. Plaintiff _____ is an adult resident citizen of _____ (*city, county, state*).
2. _____ 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*), and may be served with process and other writs of this Court at _____ (*street address, city, county, state, zip code*).
3. Defendant owns and operates an automobile repair business at _____ (*street address, city, county, state, zip code*).
4. On _____ (*date*), Plaintiff delivered to Defendant, a _____ (*describe automobile*) owned by Plaintiff with a value of _____ (*dollar amount*) to be repaired by Defendant for compensation.
5. Defendant then and there undertook this employment, impliedly agreeing to use due care and skill in repairing said automobile, and agreeing to redeliver the automobile to Plaintiff on request.
6. After the expiration of a reasonable time for the completion of the repair of the said automobile, and on or about _____ (*date*), Plaintiff requested

Defendant to redeliver the said automobile to Plaintiff, but Defendant then did and still does refuse to redeliver the said automobile to Plaintiff, to Plaintiff's damage in the sum of _____ (*dollar amount*).

WHEREFORE, Plaintiff requests judgment against Defendant for:

1. Damages in the amount of _____ (*dollar amount*);
2. Costs of suit; and
3. Such other and further relief as the Court may deem just and proper.

Dated: (*date*).

Respectfully submitted,

PLAINTIFF

By: _____

William X. Smith

State Bar No. _____

One of His Attorneys

OF COUNSEL:

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