

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. Plaintiff owns _____ (e.g., in fee simple) and possesses that real property (hereafter called **Property**) situated in the County of _____, State of _____, and described as follows:

(Insert Legal Description).

4. Plaintiff and Plaintiff's predecessors in interest have had exclusive, complete, actual, open, notorious, hostile and continuous undisputed possession of the **Property** adverse to Defendant for more than _____ (statutory period).

5. Defendant claims an estate or interest in the **Property** adverse to Plaintiff. Defendant's claim is without any right, and Defendant has no estate, right, title, lien or interest in or to the **Property**, or any part of the **Property**.

6. (If required by statute, add Plaintiff and plaintiff's predecessors in interest have paid all taxes levied or assessed against the **Property** during the period of their adverse possession).

Wherefore, Plaintiff requests judgment as follows:

1. That Defendant and all persons claiming under Defendant be required to set forth the nature of their claims to the *Property* described in **Paragraph 3** above;
2. For a decree of this Court determining all adverse claims of Defendant and all persons claiming under Defendant;
3. For a decree to declaring that Plaintiff owns absolutely and is entitled to the quiet and peaceful possession of the *Property* as against Defendant and all persons claiming under Defendant, that Defendant and all persons claiming under Defendant have no estate, right, title, lien or interest in or to the *Property* or any part of it, and that title to the *Property* be quieted in Plaintiff against all claims of Defendant and all persons claiming under Defendant;
4. For a decree permanently enjoining Defendant and all persons claiming under Defendant from asserting any estate, right, title, lien or interest in or to the *Property* or any part of it adverse to Plaintiff;
5. For costs of this action; and
6. For such other and further relief as the Court deems just and proper.

Respectfully submitted,

By: _____

State Bar No. _____

One of His Attorneys

OF COUNSEL:

