

IN THE _____ (Name of Court) COURT OF
_____ (Name of County), _____ (Name of
State)

(Name of Plaintiff)

PLAINTIFF

V.

CAUSE NO. _____, _____

(Name of Defendant)

DEFENDANT

COMPLAINT

COMES NOW _____ (Name of Plaintiff), Plaintiff in the
above-styled and numbered cause, and files this his Complaint against Defendant,
_____ (Name of 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.

Defendant is an adult resident citizen of _____
_____ (city, county, state).

3.

On or about _____ (date), Plaintiff was, ever since has been,
and now is, the owner and entitled to possession of an undivided one-half interest in the
following-described personal property (hereinafter called *Automobile*):

One (1) Motor Vehicle more particularly described as follows:

- Make _____
- Model _____
- Body Type _____
- Vehicle Identification Number (VIN) _____
- Year: _____

4.

On that date *Automobile* was of the value of \$_____, and Plaintiff's undivided interest in *Automobile* was of the value of \$_____.

5.

On that date in _____ (city, county, state) Defendant, without Plaintiff's assent or authority, wrongfully and unlawfully took possession of *Automobile* and converted the property to his own use and benefit, depriving Plaintiff of the same, to Plaintiff's damage in the sum of \$_____, the reasonable market value of Plaintiff's interest in the property on that date.

6.

Plaintiff has often demanded the return of the *Automobile*, or the value of Plaintiff's interest in the *Automobile*, but Defendant has refused, and still refuses, to either return the *Automobile* to Plaintiff or to compensate Plaintiff for the value of Plaintiff's interest in the *Automobile*. A copy of Plaintiff's written demand is attached as **Exhibit A** and incorporated by reference.

7.

Plaintiff desires a partition of the property described above. The parties have been unable to agree as to the manner in which the property shall be divided.

8.

There are no liens or encumbrances on the *Automobile* and no person other than Plaintiff and Defendant is interested in the property as owner or otherwise.

Plaintiff requests judgment against Defendant for:

1. The return of the *Automobile*, or compensation for the value of Plaintiff's interest in the property, in the amount of \$_____;
2. \$_____ for loss of use of the *Automobile*;
3. For the partition of the *Automobile* according to the respective rights of the parties;
4. If partition cannot be had without prejudice to the owners, or if *Automobile* cannot be divided, then for the sale of *Automobile* and division of the proceeds of sale according to the respective interests of the parties;
5. Costs of suit; and
6. Such other and further relief as the court deems just and proper.

Respectfully submitted,

(Name of Plaintiff)

By: _____
(Name of Plaintiff)