

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

(Name of Plaintiff)

PLAINTIFF

V.

CAUSE NO. _____, _____

(Name of Defendant)

DEFENDANT

Complaint for Breach of Contract

COMES NOW _____ (Name of Plaintiff), Plaintiff in the above-styled and numbered cause, by and through his attorneys, 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 _____ (date), at _____ (time), in the County of _____, State of _____, Defendant and Plaintiff entered into an oral agreement in which Defendant on his part agreed (**specify what Defendant agreed to do**) _____

_____.
4. In consideration of Defendant's promise, Plaintiff on his part agreed to (*describe what Plaintiff agreed to do*).
5. Plaintiff has performed all the conditions of the contract on Plaintiff's part to be performed.
6. Defendant has failed and refused to perform the agreement in that (**specify nature of Defendant's breach**) _____
_____.
7. By reason of the breach by Defendant, Plaintiff has sustained damages in the sum of \$ _____.

Wherefore, Plaintiff requests judgment against Defendant for the sum of \$ _____, plus attorney's fees in the amount of \$ _____, for the total sum of \$ _____. Plaintiff further requests costs of suit and such other relief as this Court may deem just and proper.

Respectfully submitted,

(Name of Plaintiff)

By: _____

(Name of Plaintiff's Attorney)

State Bar No. _____

His Attorney