

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

(Name of Plaintiff)

Plaintiff

V.

CAUSE NO. _____, _____

Defendants

(Names of Defendants) and
all persons unknown, claiming any
legal or equitable right, title, estate,
lien or interest in the property described
in the complaint named as DOES
1 through 10

Complaint to Quiet Title

COMES NOW _____ (Name of Plaintiff), Plaintiff in the
above-styled and numbered cause, by and through his Attorney, and files this his
Complaint against Defendants, _____
(Names of Defendants), 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 _____ (Name of Defendant) is an adult
resident citizen of _____ (city, county, state), and may
be served with process and other writs of this Court at _____
_____ (street
address, city, county, state, zip code).
3. Defendant _____ (Name of Defendant) is an adult
resident citizen of _____ (city, county, state), and may
be served with process and other writs of this Court at _____
_____ (street address,
city, county, state, zip code).
4. Plaintiff has no knowledge of the true names and identities of Defendants
sued in this action as DOES 1–10 and therefore sues them by such fictitious
names. This Complaint will be amended when the true identities are ascertained.

5. The property which is the subject matter of this action situated in the County of _____, State of _____, and described as follows:

(Insert Legal Description)

_____.

6. Defendants designated as DOES 1 through 10 “all persons unknown, claiming any legal or equitable right, title, estate, lien or interest in the property described in the Complaint.”

7. Plaintiff, is now, and at all times mentioned in this Complaint, was an owner of and in the possession of all the real property described in **Paragraph 5** above, said real property to be hereinafter referred to as the *Property*.

8. Defendants, and each of them in this action, claim an interest and estate in the Property adverse to plaintiff.

9. Defendants' claims are based on **(description of grounds for Defendants' claims)** _____

_____.

10. Plaintiff has had exclusive, complete, actual, open, notorious, hostile, and continuous possession of the Property adverse to defendants for more than _____ **(number)** years. Plaintiff has paid all taxes levied or assessed against the property and all other assessments during the past _____ **(number)** years. Plaintiff has made and paid for all repairs, upkeep, and insurance on the property for the past _____ **(number)** years. Defendants, and each of them, have failed and refused to pay for any taxes, insurance, or upkeep on the Property and their claims to ownership cause great and irreparable harm to plaintiff. Plaintiff is unable to borrow against the property to make necessary repairs, which lack of repair results in waste of the Property. Further, the adverse claims of Defendants tend to depreciate greatly the value of the Property.

11. Unless Defendants are enjoined from asserting their adverse claims to the Property, Defendants will continue to assert their adverse claims resulting in irreparable harm, damage, and injury to plaintiff. Plaintiff has no adequate remedy at law.

WHEREFORE, Plaintiff requests judgment against Defendants and each of them, known or unknown, as follows:

1. That Defendants be required to set forth the right, nature, and virtue of their claim to the Property, and that all adverse claims of the Defendants be

determined by decree of this Court;

2. That it be declared and adjudged that Plaintiff is the owner of the Property and entitled to possession;

3. That it be declared and adjudged that the Defendants have no estate, right, title, or interest whatsoever in or to the Property or any part of it.

4. That Defendants be permanently enjoined and restrained from asserting any estate, right, title, or interest whatsoever, in or to the Property or any part of it, adverse to Plaintiff;

5. For costs; and

6. For such other and further relief as the court may deem proper.

Respectfully submitted,

(Name of Plaintiff)

By: _____
(Name of Plaintiff's Attorney)
State Bar No. _____

Plaintiff's Attorney

OF COUNSEL:

(Name of Plaintiff's Attorney)
Post Office Box _____ - _____

City, State, Zip Code
Telephone: _____ - _____ - _____