
3. In _____, Defendant undertook to provide legal services for Plaintiff in connection with _____, hereinafter "Legal Matter". At all times Defendant held himself out as competent in the area of law dealing with the legal matter for which Plaintiff retained the services of Defendant. Plaintiff and Defendant acted under an attorney/client relationship in which Defendant undertook to represent Plaintiff.

4. Defendant was required to exercise the same legal skill as a reasonably competent attorney and to use reasonable care in determining and implementing a strategy to be followed to achieve the Plaintiff's legal goals. As a fiduciary of Plaintiff, Defendant was obligated to treat all information relating to a Plaintiff's representation as confidential and to zealously represent the Plaintiff's interests, including the disclosure of any conflicts of interest that might impair the Defendant to ability to represent the Plaintiff.

5. In the course of handling the legal matter for the Plaintiff, Defendant negligently failed to act with the degree of competence generally possessed by Attorneys in the State who handle legal matters similar to Plaintiff's. Plaintiff paid Defendant a substantial amount of money for the sole purpose of representing Plaintiff in said legal matter.

5. Plaintiff aver that Defendant was negligent and/or committed malpractice and breached fiduciary duties to Plaintiff, in the following regard:

- (a) By failing to explain to the Plaintiff that _____;
- (b) By representing to the Plaintiff that _____;
- (c) By holding himself out as the attorney for Plaintiff but not representing the best interest of Plaintiff.
- (d) By taking large sums of money under the guise of "non-refundable" retainers without any accounting therefor.
- (e) By failing to provide Plaintiff with the minimum standard of care.

(f) State other grounds

6. In addition to the negligence and/or malpractice committed by the defendant as mentioned in the above paragraph, Defendant fraudulently induced the plaintiffs to pay him large sums of money by making representations regarding the legal matter which were untrue.

7. As a direct and proximate result of defendant's negligence and/or malpractice and fraudulent inducement, Plaintiff sustained actual damages in the amount of \$_____.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs hereby demand judgment of and from the Defendant in the amount of \$_____ in compensatory damages, together with pre-judgment and post-judgment interests and all cost accrued herein.

Respectfully submitted,

Plaintiff