

1 [INSERT CAPTION AND STYLE]
2

3 COMPLAINT (TORTIOUS INTERFERENCE WITH CONTRACT)

4 PARTIES

5 1. The Plaintiff(s), *[insert name of plaintiff]* at all times relevant hereto, is/are adult
6 citizens of the State of *[insert state jurisdiction]* and reside in *[insert county name]*, and are the
7 heirs and wrongful death beneficiaries of the decedent, *[insert decedent's name]*.

8 2. The Defendant(s), *[insert names of each defendant]* at all times relevant hereto,
9 is:

10 (INSERT 1 OR MORE OF THE FOLLOWING PARAGRAPHS)

- 11 (1) a corporation incorporated under the laws of the State of *[insert state of*
12 *incorporation]* and is *[or is not]* authorized to do business as a foreign
13 corporation in this State, and is subject to service of process by and through its
14 registered agent: *[insert name and address of registered agent]*;
15
16 (2) an adult citizen of the State of *[insert defendant's state of residency]* who resides
17 at *[inserts defendant's street address, city and zip code]* and is subject to service
18 of process pursuant to the laws of the State of *[e.g., state of filing, or long-arm*
19 *statute, choice of law provision, statute if diverse jurisdiction]*.
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21 FACTS

22 3. On or about *[insert date]* the Plaintiff and *[insert name of other contracting*
23 *party]* (hereinafter referred to as the 3rd Party), entered into a written contract, a copy of which is
24 attached hereto, made a part hereof, and is marked as Exhibit A (hereinafter referred to as the
25 Contract) *[or, if a copy of the contract is not attached, state the reasons why it is not attached]*.
26 Said contract provides that the laws of the State of *[insert state of jurisdiction]* shall govern the
27 Contract.
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2 4. Pursuant to the Contract, the Plaintiff agreed to: *[insert a description of the*
3 *plaintiff's duties and obligations under the contract]*, and the 3rd Party agreed to: *[insert a*
4 *description of defendant's duties and obligation under the contract]*.

5 1. On or about *[insert date]* the 3rd Party breached the Contract by: *[insert facts*
6 *giving rise to defendant's breach of the contract, e.g., failure to perform duty or obligation]*.

7 2. The Defendant interfered with the performance of the Contract by: *[insert*
8 *description of the Defendant's acts constituting interference]* causing the 3rd Party to breach the
9 Contract.
10

11 3. Plaintiff has performed all conditions precedent to recovery and has not excused
12 defendant's non-performance or breach of the Contract.

13 CLAIMS

14 8. The Defendant's acts delineated hereinabove were willful and intentional.

15 9. The Defendant's acts delineated hereinabove were done with the unlawful
16 purpose
17 of causing damage and loss to the Plaintiff.
18

19 10. The Defendant's acts delineated hereinabove were calculated to cause loss and
20 damage to Plaintiff in his/her lawful business or undertakings.

21 11. The Defendant's acts delineated hereinabove proximately caused Plaintiff to
22 suffer:
23 *[insert amount of contract damages or other loss]*.

24 DEMAND FOR RELIEF

25 10. WHEREFORE, the Plaintiffs pray for the following relief:

26 1. Trial by jury;

27 2. Judgment for Plaintiff and against the Defendant;
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3. An award of damages in an amount which will fully and fairly compensate Plaintiff for *[insert types of damages from claims section above]*.
4. Reasonable attorney fees, costs and expenses (*if provided for in the Contract or allowed by statute*);
5. Such other and further relief as may be deemed just and proper in the premises.