

IN THE UNITED STATES DISTRICT COURT
FOR THE [DISTRICT NAME] DISTRICT OF [STATE]
[DIVISION NAME] DIVISION

[PLAINTIFF'S FULL NAME],

Plaintiff,

v.

[DEFENDANT'S FULL NAME]; [ADDITIONAL DEFENDANT, if any],

Defendant(s).

Case No.: _____

JURY TRIAL DEMANDED

CIVIL COMPLAINT

I. INTRODUCTION

Plaintiff [Plaintiff's Full Name] brings this civil action against Defendant [Defendant's Full Name] for [brief description, e.g., 'breach of contract and fraud arising from Defendant's failure to perform under a services agreement and material misrepresentations made to induce Plaintiff to enter into

that agreement']. Plaintiff seeks compensatory damages, consequential damages, attorneys' fees and costs, and such other relief as the Court deems just and proper.

II. PARTIES

1. Plaintiff [Full Name] is an individual [or: a [state] corporation / limited liability company / etc.] residing at [or: with its principal place of business at] [Address, City, State, Zip].
2. Defendant [Full Name] is an individual [or: a [state] corporation / LLC / etc.] residing at [or: with its principal place of business at] [Address, City, State, Zip]. Defendant may be served with process at [registered agent's address or last known address].
3. [Add additional parties as necessary, including their residency and service information.]

III. JURISDICTION AND VENUE

4. This Court has subject matter jurisdiction over this action pursuant to [28 U.S.C. § 1332 (diversity of citizenship) because Plaintiff and Defendant are citizens of different states and the amount in controversy exceeds \$75,000, exclusive of interest and costs] [OR: 28 U.S.C. § 1331 (federal question) because Plaintiff's claims arise under [federal statute or constitutional provision]].
5. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b) because [a substantial part of the events or omissions giving rise to the claims occurred in this District] [and/or: Defendant is subject to the Court's personal jurisdiction and resides in this District].
6. This Court has personal jurisdiction over Defendant because Defendant [resides in this State / is incorporated in this State / transacts business in this State / committed tortious acts within this State / etc.] and [describe specific contacts with the forum].

IV. GENERAL ALLEGATIONS

[Set forth the detailed factual background in numbered paragraphs. Include all relevant events in chronological order. Be specific as to dates, places, amounts, and the roles of each party. These facts should form the foundation for each cause of action asserted below.]

7. On or about [Date], Plaintiff and Defendant entered into a written agreement (the 'Agreement') for [describe subject matter, e.g., 'the provision of professional services']. A true and correct copy of the Agreement is attached hereto as Exhibit A and incorporated by reference.
8. Under the terms of the Agreement, Defendant was obligated to [describe specific obligations, including deadlines, deliverables, and consideration].
9. In consideration thereof, Plaintiff agreed to pay Defendant [amount] pursuant to the payment schedule set forth in the Agreement.
10. Plaintiff fully performed all obligations under the Agreement, including timely payment of all sums due.
11. Despite Plaintiff's performance, Defendant [describe the breach or wrongful conduct in detail, including specific acts and omissions, dates, and resulting harm].
12. [Continue with additional factual allegations as needed.]

V. CAUSES OF ACTION

COUNT I – BREACH OF CONTRACT

13. Plaintiff re-alleges and incorporates herein by reference all preceding paragraphs as if fully set forth herein.

14. A valid and enforceable contract existed between Plaintiff and Defendant as described above.
15. Plaintiff performed all of its obligations under the Agreement.
16. Defendant materially breached the Agreement by [describe specific breach].
17. As a direct and proximate result of Defendant's breach, Plaintiff has suffered damages in an amount to be determined at trial, but believed to exceed \$[amount].

COUNT II – [SECOND CAUSE OF ACTION, e.g., FRAUD / NEGLIGENCE / UNJUST ENRICHMENT]

18. Plaintiff re-alleges and incorporates herein by reference all preceding paragraphs as if fully set forth herein.
19. [State each element of the second cause of action in a separate numbered paragraph, with specific factual allegations supporting each element.]
20. As a direct and proximate result of Defendant's [wrongful conduct], Plaintiff has suffered damages in an amount to be determined at trial, including [list specific categories of damages: actual damages, consequential damages, punitive damages if applicable].

VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff [Plaintiff's Name] respectfully requests that this Court enter judgment in Plaintiff's favor and against Defendant, and award the following relief:

- a. Compensatory damages in an amount to be proven at trial;
- b. Consequential and incidental damages;
- c. Pre-judgment and post-judgment interest at the maximum rate allowed by law;

- d. Attorneys' fees and costs of this action to the extent permitted by law or contract;
- e. Injunctive relief, including a permanent injunction restraining Defendant from [describe specific conduct];
- f. Punitive damages where permitted by law; and
- g. Such other and further relief as this Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury on all issues so triable pursuant to Rule 38 of the Federal Rules of Civil Procedure.

Respectfully submitted,

By: _____

[Attorney's Full Name], Esq.

State Bar No. [XXXXXX]

[Law Firm Name]

[Address, City, State, Zip]

Tel: [Phone] | Email: [Email]

Attorney for Plaintiff

Dated: _____