

JURISDICTIONAL ALLEGATIONS

Sample Only
Use At Your Own Risk



INSTRUCTIONS: These sample allegations are designed to identify the parties and establish the Plaintiff(s)' right to file an action in a particular court and may not be appropriate for your particular case. They are usually inserted into a complaint immediately below the heading and are incorporated by reference in all subsequent causes of action.

COMMON ALLEGATIONS

<>. Plaintiff, _____ [Plaintiff's name]. (hereinafter "_____"), is, and at all times herein mentioned, was a resident of the City of _____, County of _____, State of California.

<>. Plaintiff is informed and believes that Defendant, _____ [Name] (hereinafter "_____") is, and at the times mentioned in this Complaint, was a resident of the City of _____, County of _____, State of California.

[Repeat for each Defendant]

<>. Plaintiff is informed and believes and thereon alleges that each of the Defendants named herein as DOES 1 through 50, inclusive is intentionally or negligently responsible, or is otherwise legally responsible, in some manner, either vicariously or by virtue of his, her, or its own conduct, negligence or failure to act, or for the conduct, negligence or failure to act on the part of his, her, or its agents, servants or employees, for the acts and occurrences herein referred to, and has proximately caused injury and damages thereby to Plaintiff as result of their conduct hereinafter described.

<>. Plaintiff is informed and believes and thereon alleges that at all times herein mentioned, the Defendants and the Defendants DOES 1-50, and each of them, were the agents or employees of each other, and were at all times acting within the purpose, scope and course of said agency, and employment, and with full knowledge and consent of each other.

<>. [Allege here all factual allegations common to all of your causes of action so that you don't have to repeat them for each cause. When you are finished drafting your jurisdictional allegations, you will be ready to insert your causes of action into the

Complaint.]

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