



COMPLAINT FOR BREACH OF CONTRACT

Sample Only
Use At Your Own Risk



INSTRUCTIONS: The following is a "cause of action" to be inserted after the heading of the complaint and common allegations. Include as many other causes of action as you have claims such as fraud, accounting, etc. Your "prayer" (request for relief) comes after your causes of action and must describe the relief you are seeking for each cause of action.

_____ **CAUSE OF ACTION**
(For _____ Against _____)

<>. On or about ____, 19__, in the City of ____, County of ____, State of California, Plaintiff and defendant entered into a written agreement, a copy of which is attached hereto as Exhibit "A" and made a part hereof. By the terms of said written agreement, ____.

<>. The consideration set forth in the agreement was the fair and reasonable.

<>. Plaintiff has performed all conditions, covenants, and promises required by him on his part to be performed in accordance with the terms and conditions of the contract.

<>. Defendant has failed and refused, and continues to fail and refuse, to perform the conditions of the contract on his part in that ____.

<>. Plaintiff has no adequate legal remedy in that ____ (damages, if awarded, cannot be properly ascertained since there is no fixed market value and damages will be inadequate to compensate.

<>. By the terms of said written agreement, the Plaintiff is entitled to recover reasonable attorney fees incurred in the enforcement of the provisions of the agreement. By reason of the aforementioned breach of the defendant, the Plaintiff has

been forced to secure the services of the legal firm of _____ to prosecute this lawsuit.

WHEREFORE, plaintiff__ pray__ judgment against defendant__ and each of them, as follows:

<>. For damages for _____

<>. For an order requiring defendant to _____

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

Date: _____
_____ [Plaintiff's name]
Plaintiff *In Pro Per*

Gene Kinsey Kinsey Law Offices 1198 Pacific Coast Hwy., Suite 353 Seal Beach, CA 90740	Phone: (562) 596-8177 Email: KinseyE@ix.netcom.com Web: www.kinseylaw.com www.realpropertypartition.com
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