

COMPLAINT FOR BREACH OF GOOD FAITH AND FAIR DEALING

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 Breach Of Implied Covenant Of Good Faith And Fair Dealing Against _____)

<>. Defendant __, __ is __, and at all times herein mentioned was __, a resident __ of the City of __, County of __, State of California.

<>. Defendant __, __, is __, and at all times herein mentioned, was __ a Corporation organized and existing under the laws of the State of California with principle offices located at __, in the City of __, County of __.

<>. Plaintiff __ is __ ignorant of the true names and capacities of defendants sued herein as DOES I through X, inclusive, and therefore sues __ these defendants by such fictitious names. Plaintiff __ will amend this complaint to allege their true names and capacities when ascertained.

<>. Plaintiff __ is __ informed and believes __ and thereon alleges __ that, at all times herein mentioned, each of the defendants sued herein was the agent and employee of each of the remaining defendants and was at all times acting within the purpose and scope of such agency and employment.

<>. California law implies a covenant of good faith and fair dealing in all contracts between parties entered into in the State of California.

<>. As a result of the actions of defendants __, and each of them, set forth

hereinabove, said defendant___ have___ violated the implied covenant of good faith and fair dealing contained in ___ as against said Plaintiff___ herein, and as a result thereof, Plaintiff___ is__ entitled to damages as prayed.

<>. The actions of said defendant___, in ___[--e.g. as hereinbefore described---] in violation of said implied covenant of good faith and fair dealing have caused the Plaintiff___ to suffer damages in that ___ in the amount of ___.

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

1. ____
2. ____
3. ____
4. For such other and further relief as the court deems proper.

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

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