



CAUSE OF ACTION FOR INJUNCTION

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 _____)

<>. Beginning on or about ____, 19__., and continuing to the present time, defendants, and each of them, wrongfully and unlawfully ____.

<>. On or about ____, 19__., and a number of times since then, plaintiff__ has__ demanded that defendants stop their wrongful conduct described above. Defendants, and each of them, have refused and still refuse to refrain from their wrongful conduct.

<>. Defendants' wrongful conduct, unless and until enjoined and restrained by order of this court, will cause great and irreparable injury to plaintiff__ in that ____.

<>. Plaintiff__ has__ no adequate remedy at law for the injuries currently being suffered in that ____ (it will be impossible for plaintiff__ to determine the precise amount of damage which __ will suffer if defendants' conduct is not restrained) (plaintiff will be forced to institute a multiplicity of suits to obtain adequate compensation for ____ injuries.

<>. As a result of defendants' wrongful conduct, plaintiff__ has__ been damaged in the sum of \$____. Plaintiff__ will be further damaged in like manner so long as defendants' conduct continues. The full amount of such damage is not now known to plaintiff__, and plaintiff__ will amend this complaint to state such amount when the same becomes known to ____, or on proof thereof.

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

1. For an order requiring defendants to show cause, if any they have, why they should not be enjoined as hereinafter set forth, during the pendency of this action;
2. For a temporary restraining order, a preliminary injunction, and a permanent injunction, all enjoining defendants, and each of them, and their agents, servants, and employees, and all persons acting under, in concert with, or for them:
 - A. From ____;
 - B. To ____;
3. For damages in the sum of \$____, plus damages in such further sums as may be sustained and as are ascertained before final judgment herein;
4. For attorney fees herein incurred;
5. For costs of suit herein incurred; and
6. For such other and further relief as the court deems proper.

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

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