

COMMON COUNTS CAUSES OF ACTION

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 Money Against _____)

<>. Plaintiff__ incorporate__ in this Cause of Action Paragraphs ___ through ___ herein the same as though fully set out in this Cause of Action at length.

<>. Within the last ___ (two or four) years on or about ___, 19___, at ___, California, defendant__ became indebted to plaintiff__ in the sum of \$___ for money had and received by defendant__ for the use and benefit of plaintiff__.

<>. Neither the whole nor part of this sum has been paid [except the sum of \$___] although demand therefor has been made, and there is now due, owing, and unpaid the sum of \$___ with interest thereon at the rate of ___ percent per annum from ___, 19___.

_____ CAUSE OF ACTION

(For Money Lent Against _____)

<>. Within the last ___ years on or about ___, 19___ at ___, California, defendant__ became indebted to plaintiff__ in the sum of \$___ for money lent by plaintiff__ to defendant__ at defendant__ request.

<>. Neither the whole nor any part of the above sum has been paid, [except the sum of \$___] although payment has been demanded, leaving a balance due, owing, and unpaid to plaintiff in the sum of \$___, together with interest thereon at the rate of ___

per annum from ____, 19__.

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

<>. Within the last __ years on or about ____, 19__ at ____, California, defendant__ became indebted to plaintiff__ in the sum of \$____ for money paid, laid out, and expended for defendant at defendant__ instance and request.

<>. Neither the whole nor any part of the above sum has been paid, [except the sum of \$__] although payment has been demanded, leaving a balance due, owing, and unpaid to plaintiff in the sum of \$____, together with interest thereon at the rate of ____ per annum from ____, 19__.

_____ **CAUSE OF ACTION**
(For Work, Labor and Materials Against _____)

<>. Within the last __ years on or about ____, 19__ at ____, California, defendant__ became indebted to plaintiff__ for work and labor done by plaintiff__ for defendant at the special instance and request of defendant__, and for materials furnished in connection with the work and labor, for the sum of \$____ which sum defendant__ agreed to pay plaintiff__.

<>. Neither the whole nor any part of the above sum has been paid, [except the sum of \$__] although demand therefor has been made, and there is now due and owing, and unpaid the sum of \$____, with interest thereon at the rate of ____ percent per annum from ____, 19__.

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

<>. Within the last ___ years on or about ____, 19__ at ____, California, plaintiff___ rendered work, labor, and services to defendant___ at the special request of defendant___ for which defendant___, then and there, promised to pay plaintiff___ the reasonable value of such services.

<>. At all times herein mentioned, the above services were and are of the reasonable value of \$____.

<>. No part of the above sum has been paid, [except the sum of \$___] notwithstanding that plaintiff has demanded payment therefor, and there is now due, owing, and unpaid from defendant to plaintiff the sum of \$____.

WHEREFORE, plaintiff___ pray___ judgment against defendant___ and each of them, as follows:

<> For damages for _____ according to proof.

<>. For interest from _____ at the rate of 10% per annum.

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

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

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