

## 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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