IN THE COURT OF COUNTY,
NAME OF PLAINTIFF)
V.) NO
NAME OF DEFENDANT)))))))
COMPLAINT
COMES Plaintiff, and files this Complaint against Defendants,
and would state in support thereof the following:
1. Plaintiff, is a Corporation whose address is Post Office
Box, Defendants, are residents of
County,, who may be served with process at
2. On or about Plaintiff and Defendants verbally agreed to the renovation
of Defendants' home located at,, by Plaintiff on the basis of cost plus
fifteen percent (15%).
3. On or about a building permit was granted by the and
construction on the residence of Mr. and Mrs began.
4. At all times during the construction of said house, Plaintiff performed all work and
services at the direction and instructions of Defendants.
5. Plaintiff has performed work on said residence in a total amount of
DOLLARS (\$) and Defendants have only paid Plaintiff the sum of
DOLLARS (\$) for a balance owed of DOLLARS (\$)

6. Plaintiff has filed a construction lien on said property as recorded in Construction
Lien Book at Page, said property being more particularly described as
follows:
[DESCRIPTION]
7. A dispute has arisen by and between Plaintiff and Defendants as to the terms of
the verbal agreement and any modifications thereto, and Plaintiff requests that the Court
construe, determine and interpret the parties' agreement in equity.
8. Plaintiff further requests that the Court enter an order awarding unto Plaintiff,
damages in the amount of DOLLARS (\$) and further awarding
foreclosure of the construction lien recorded in Book at Page in the
Construction Lien Records at the office of the Chancery Clerk of County,
, and awarding Plaintiff's attorneys fees and other costs of pursuing this action in
accordance with law.
WHEREFORE, PREMISES CONSIDERED, Plaintiff, requests that the
Court enter an order awarding unto Plaintiff the following relief: (a) construction and
interpretation of the parties' contract in equity, (b) judgment against Defendants,,
awarding Plaintiff damages in the amount of DOLLARS (\$), (c)
foreclosure of the construction lien recorded in Book at Page in the Construction
Lien Records of County,
Respectfully submitted,