

\_\_Attorney name]\_\_  
\_\_[Address]\_\_  
\_\_[Telephone number]\_\_

Attorney for Plaintiff, \_\_[name]\_\_

\_\_\_\_ Court, County of \_\_\_\_  
\_\_[\_\_\_\_ District]\_\_

\_\_\_\_\_) No. \_\_\_\_

Plaintiff(s) )

vs. ) COMPLAINT FOR INJUNCTIVE RELIEF

) \_\_[AND DAMAGES]\_\_

\_\_\_\_\_) )

Defendant(s) )

\_\_\_\_\_)

Plaintiff, \_\_[name]\_\_, alleges:

1. Plaintiff is now, and at all times mentioned in this complaint has been, \_\_[allege facts showing plaintiff's status and interest in subject of action, e.g., owner of certain described real property/shareholder of \_\_[name of corporation]\_\_ engaged in the business of \_\_[specify]\_\_]\_\_.

2. Defendant, \_\_[name]\_\_, is now, and at all times mentioned in this complaint has been, \_\_[allege facts showing defendant's status in relation to plaintiff, e.g., adjoining landowner/officer of \_\_[name of corporation]\_\_ engaged in the business of \_\_[specify]\_\_]\_\_.

3. On or about \_\_[date]\_\_, and continuing to the present, defendant has wrongfully and unlawfully \_\_[allege defendant's wrongful acts in particular as well as general course of conduct]\_\_. \_\_[If acts have not yet been committed, but are imminent, allege accordingly]\_\_.

4. On or about \_\_[date]\_\_, and at other times between that date and the present, plaintiff has demanded that defendant refrain from committing the above acts, but defendant has refused and has threatened to \_\_[continue/commence]\_\_ such acts unless immediately enjoined by this Court from doing so.

5. As a result of defendant's acts, plaintiff \_\_\_[has sustained/will sustain]\_\_\_ great and irreparable injury in that \_\_\_[allege specific injury, showing irreparable character, e.g., specific waste, destruction, trespass, or injury to real property/facts and circumstances showing that acts constitute nuisance/loss of contracts, customers, or trade/deprivation of civil or constitutional rights]\_\_\_.

6. Plaintiff cannot be fully compensated in damages, is without an adequate remedy at law because the exact amount of damage plaintiff will sustain will be difficult to determine, and \_\_\_[allege other facts showing inadequacy of legal remedy, e.g., defendant's inability to respond in damages/imminent multiplicity of actions/public policy considerations/exhaustion of legal or administrative remedies]\_\_\_.

[Add if incidental damages are sought]

7. As a further result of defendant's acts, plaintiff has sustained damage in the amount of \$\_\_\_\_\_. If these acts are permitted to continue, plaintiff will be further damaged in an amount to be alleged when additional damages have been determined.

[Continue]

WHEREFORE, plaintiff demands judgment for:

1. \_\_\_[State character of relief sought, e.g., temporary restraining order/preliminary and permanent injunction]\_\_\_ enjoining \_\_\_[name persons to be enjoined, e.g., defendant, \_\_\_[his/her/its]\_\_\_ agents, employees, officers, attorneys, and representatives]\_\_\_ from engaging in or performing any of the following acts: \_\_\_[Specify acts sought to be enjoined]\_\_\_.

2. Damages against defendant in the amount of \$\_\_\_\_\_[and additional damages according to proof]\_\_\_.

3. Costs of this action and other just relief.

Date: \_\_\_\_\_ [Signature]

\_\_\_\_\_  
\_\_\_[Typed name]\_\_\_  
Attorney for \_\_\_\_\_