V I R G I N I A:

IN THE CIRCUIT COURT OF

\*

\*

Plaintiff \*

\*

vs. \* Case No. \_\_\_\_\_\_\_\_\_\_

\*

\*

\*

Defendant \*

COMPLAINT

(Breach of Contract)

COMES NOW the plaintiff, by counsel, and in support of this Complaint states as follows:

1. The plaintiff resides at the address listed above in the caption.

2. The defendant resides at the address listed above in the caption.

3. On the parties hereto did enter into a contract wherein the parties agreed .

COUNT I - Breach of Contract

4. Paragraphs 1 through 3 above are incorporated herein by reference.

5. The defendant has breached the contract in that [insert text].

6. There has been no breach of contract by the plaintiff.

7. Such breach of contract has caused direct damages to the plaintiff in the amount of approximately $ and indirect damages to the plaintiff in the amount of approximately $ , all of which were within the contemplation of the parties when the contract was entered into.

WHEREFORE, these premises considered, the plaintiff requests judgment against the defendant in the amount of $ , plus an award of costs and interest.

COUNT II - Anticipatory Breach

8. Paragraphs 1 through 3 and 6 through 7 above are incorporated herein by reference.

9. There has been an anticipatory breach of the contract by the defendant in that .

WHEREFORE, these premises considered, the plaintiff requests judgment against the defendant in the amount of $ , plus an award of costs and interest.

COUNT III - Breach of Implied Contract

10. Paragraphs 1 through 2 above are incorporated herein by reference.

11. The following actions of the plaintiff have conferred upon the defendant a significant benefit under such circumstanc­es that the law implies a promise to pay:

12. The reasonable value of the benefit conferred is $ .

WHEREFORE, these premises considered, the plaintiff requests judgment against the defendant in the amount of $ , plus an award of costs and interest.

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Brien A. Roche, Esq., VSB No. 16165

Johnson & Roche

8355A Greensboro Drive

McLean, Virginia 22102

*Tel.:* (703) 821-3740

*Fax:* (703) 790-9462

[brienroche@aol.com](mailto:brienroche@aol.com)

*Counsel for \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_*

Interrogatories and Request for Documents are served along with this pleading