V I R G I N I A:

IN THE CIRCUIT COURT OF

\*

Plaintiff \*

\*

v \* Case No.\_\_\_\_\_\_\_

\*

\*

\*

Defendant \*

COMPLAINT

(Promissory Note)

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

1. The plaintiff is a citizen of the state of and resides at the address listed in the caption of this matter.

2. The defendant is a citizen of the state of and resides at the address listed in the caption of this matter.

3. This Court has subject matter jurisdiction over this matter pursuant to 28 USC 1332(a) due to the diversity of citizenship of the parties and because the amount in controversy exceeds $75,000 exclusive of interest and costs.

4. Venue is appropriate in this Federal district under 28 USC 1391 due to the fact that the incident in question occurred in this district.

5. This Court has personal jurisdiction over the defendant pursuant to Virginia Code 8.01-328.1 due to the fact that the defendant .

6. On , the defendant did sign a promissory note (attached hereto as Exhibit A) promising to pay the plaintiff the principal sum called for in the note plus interest.

7. The defendant did fail to make the payment due on , 199 , and therefore the entire amount due under the note is now due and payable.

WHEREFORE, these premises considered, the plaintiff requests judgment against the defendant for the principal sum of $ plus the interest called for in the note at the rate of percent, plus attorney's fees in the amount of $ , plus costs.

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

**Interrogatories and Request for Documents are served along with this pleading.**