V I R G I N I A

IN THE CIRCUIT COURT OF

\*

Plaintiff \*

\*

v. \* Case No.

\*

\*

\*

Defendant \*

COMPLAINT

(Legal Malpractice)

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

1. The plaintiff resides at the address listed in the caption of this matter.

2. The individual defendant is an attorney licensed to practice law in the Commonwealth of Virginia with offices at the address indicated in the caption above.

3. The corporate defendant is a professional corporation composed of attorneys licensed to practice law in the Common­wealth of Virginia. The individual defendant was at all times an agent, representative, and/or employee of the corporate defen­dant.

4. On or about the day of ,199 the defendants did undertake to perform certain legal services for the plaintiff consisting of the following:

5. The defendants failed to provide adequate representa­tion and legal services to the plaintiff in that

COUNT I

(Breach of Contract)

6. By engaging in the conduct set forth in the foregoing paragraphs the defendants breached their contract for the provi­sion of legal services to the plaintiff. As a result of the defendants' breach, the plaintiff has been damaged in that .

7. The plaintiff has suffered damages as a result of the defendant's breach in the amount of $ .

COUNT II

(Statutory Liability for Professional Negligence)

8. By engaging in the conduct set forth in the foregoing paragraphs the defendants have neglected their duty to the plaintiff and are liable to the plaintiff for damages sustained pursuant to Virginia Code 54.1-3906.

9. As a result of the defendants' neglect of their duty to the plaintiff, the plaintiff has been damaged in that

10. The plaintiff has suffered damages as a result of the defendants' neglect of their duty in the amount of $ .

COUNT III

(Common Law Negligence)

11. As indicated in the foregoing paragraphs, as a result of the defendants' undertaking to provide legal services to the plaintiff, and their employment by the plaintiff for that pur­pose, the defendants had a duty of care to the plaintiff to exercise the skill and knowledge ordinarily possessed by attor­neys under similar circumstances, to exercise a reasonable degree of care, skill, and dispatch in carrying out the business for which they were employed.

12. By engaging in the conduct set forth in the foregoing paragraphs, the defendants negligently breached their duty of care to the plaintiff.

13. As a result of the defendants' breach of their duty of care the plaintiff has been damaged in that

14. The plaintiff has suffered damages as a result of the defendants' breach of their duty of care in the amount of $ .

WHEREFORE, these premises considered, the plaintiff requests judgment against the defendants jointly and severally in the amount of $ , plus an award of costs, interest, and such other relief that the Court may deem appropriate.

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*Counsel for*

**Interrogatories and Request for Documents are served along with this Complaint**