

CONSUMER CREDIT TRANSACTION

CIVIL COURT OF THE CITY OF NEW YORK
COUNTY OF [COUNTY]

-----:
Pedro's Home Furnishings,

Plaintiff,

- against -

Camille Consumer,
Defendant.

-----:

VERIFIED COMPLAINT
UNDER CPLR 3016(f)
Index No. 12345/2019

Plaintiff, by its attorneys, [FIRM NAME], as and for its Complaint against Defendant,
alleges as follows:

PARTIES

1. Plaintiff is a New York corporation with its principal place of business at 35 Flatbush Avenue Extension, Brooklyn, New York, 11201.
2. Defendant is a natural person residing at 67-118 Clyde Street, Forest Hills, New York, 11375.

JURISDICTION AND VENUE

3. The events giving rise to this action involve goods sold and delivered to Defendant by Plaintiff.
4. Venue in the County of [COUNTY] is proper because [*state the reason*].
5. This Court has jurisdiction over Defendant pursuant to CPLR § 301.
6. This is an action to recover from Defendant the balance due for goods sold and delivered to Defendant, together with applicable interest, costs, and disbursements.

FIRST CAUSE OF ACTION

7. Defendant owes Plaintiff [AMOUNT] dollars for goods sold and delivered to, and accepted by, defendant on [DATE], as follows:

| Item | Agreed Price |
|---|--------------------------------|
| (1)[<i>Separately number and Identify each item of the claim</i>] | [<i>State dollar figure</i>] |

8. ***[In separately numbered paragraphs, allege the additional facts that are relevant to Plaintiff's claim for relief. Do your best to meet the pleading requirements set forth in CPLR Article 30, specifically those referenced in the Class Notes for Mon. April 8 (posted on Openlab): sufficient particularity to give notice; plain and concise statements; numbered paragraphs; one allegation (fact) per paragraph etc. You are encouraged to review the sample summons & complaints posted on Openlab, with the April 8, 2019 Class Notes.]***

[IF YOU BELIEVE THERE ARE LEGAL BASES FOR ADDITIONAL CAUSES OF ACTION, YOU MAY ASSERT THEM, IN ACCORDANCE WITH THE PLEADING REQUIREMENTS.]

WHEREFORE, Plaintiff demands judgment against defendant for [AMOUNT] dollars, plus interest, costs and disbursements.

Dated: [DATE]

Attorney for Plaintiff

[Attorney's name]
[Firm name]
[Firm street address and suite number]
[Firm city, state and zip code]
[Firm telephone number]