

Forms are generic suggestions. Parties and their attorneys should revise them to address their unique circumstances of each case.

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
_____ DIVISION
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In re)
)
,) Case No. ____:____ -bk-____ -____
) Chapter
Debtor.)
_____)

)
)
Plaintiff,)
)
vs.) Adversary No. ____:____ -ap-____ -____
)
,)
)
Defendant.)
)
_____)

COMPLAINT

Plaintiff(s), [insert Plaintiff(s) name(s)], by and through their undersigned counsel, files this Complaint [insert relief sought] pursuant to and alleges the following in support of the requested relief:

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JURISDICTION

1. This is an adversary proceeding in which Plaintiff is seeking [insert text].
2. This Court has jurisdiction pursuant to 28 U.S.C. §§ 157 and 1334.
3. This is a core proceeding pursuant to 28 U.S.C. § 157[insert sub-section provisions].
4. Plaintiff has standing to bring this action pursuant to [insert code provision(s)].
5. Venue is proper pursuant to 28 U.S.C. § 1409(a) and Local Rule 1071-1 of the United States Bankruptcy Court for the Middle District of Florida.

BACKGROUND FACTS

6. [Insert all relevant background facts].

COUNT I

[Insert title and description of each count].

7. Plaintiff re-alleges and incorporates herein the allegations contained in paragraphs ____ through ____.
8. [Insert all relevant information regarding each alleged Count].

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WHEREFORE, the Plaintiff(s), [insert plaintiff(s) name(s)] respectfully requests that the Court [insert relief requested with code provision(s)] and for such other and further relief the Court deems appropriate.

[INSERT ADDITIONAL COUNTS AS NEEDED]

RESPECTFULLY SUBMITTED,

_____/s/ *SIGNATURE*

Attorney Name

Attorney Bar No.: _____

Attorney Email Address

Firm Name

Firm Address

Firm Telephone Number