

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

Plaintiff(s),

v.

Defendant(s).

CASE NO. _____
[to be filled in by Clerk's Office]

COMPLAINT FOR CONVERSION
OF PROPERTY
(28 U.S.C. § 1332; Diversity of
Citizenship)

Jury Trial: Yes No

I. THE PARTIES TO THIS COMPLAINT

A. Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name _____
Street Address _____
City and County _____
State and Zip Code _____
Telephone Number _____

1 B. Defendant(s)

2 Provide the information below for each defendant named in the complaint, whether the
3 defendant is an individual, a government agency, an organization, or a corporation. For an
4 individual defendant, include the person's job or title (if known). Attach additional pages if
5 needed.

6 Defendant No. 1

7 Name

8 Job or Title (if known)

9 Street Address

10 City and County

11 State and Zip Code

12 Telephone Number

13 Defendant No. 2

14 Name

15 Job or Title (if known)

16 Street Address

17 City and County

18 State and Zip Code

19 Telephone Number

20 Defendant No. 3

21 Name

22 Job or Title (if known)

23 Street Address

24 City and County

State and Zip Code

Telephone Number

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

Defendant No. 4

Name _____

Job or Title (*if known*) _____

Street Address _____

City and County _____

State and Zip Code _____

Telephone Number _____

II. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

- Federal question Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

1 B. If the Basis for Jurisdiction Is Diversity of Citizenship

2 1. The Plaintiff(s)

3 a. If the plaintiff is an individual.

4 The plaintiff (*name*) _____, is a citizen of the
5 State of (*name*) _____.

6 b. If the plaintiff is a corporation.

7 The plaintiff, (*name*) _____, is incorporated under
8 the laws of the State of (*name*) _____, is incorporated under
9 the laws of the State of (*name*) _____, and has its principal
10 place of business in the State of (*name*) _____.

11 *(If more than one plaintiff is named in the complaint, attach an additional page providing*
12 *the same information for each additional plaintiff.)*

13 2. The Defendant(s)

14 a. If the defendant is an individual.

15 The defendant, (*name*) _____, is a citizen of the
16 State of (*name*) _____. Or is a citizen of
17 (*foreign nation*) _____.

18 b. If the defendant is a corporation.

19 The defendant, (*name*) _____, is incorporated under
20 the laws of the State of (*name*) _____, and has its principal
21 place of business in the State of (*name*) _____.

22 Or is incorporated under the laws of (*foreign nation*) _____,
23 and has its principal place of business in (*name*) _____.

24 *(If more than one defendant is named in the complaint, attach an additional page*
providing the same information for each additional defendant.)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

III. THE AMOUNT IN CONTROVERSY

The amount in controversy-the amount the plaintiff claims the defendant owes or the amount at stake-is more than \$75,000, not counting interest and costs of court, because (*explain*):

IV. STATEMENT OF CLAIM

A. Describe the property that you own that is the subject of this complaint, including its value.

B. How and when did you come to own the property?

C. How and when did the defendant(s) obtain possession of the property? Describe with particularity the actions the defendant(s) took to convert the property.

1 D. (If the defendant(s) rightfully came into possession of the property): Describe how and
2 when you notified the defendant(s) that the property belonged to you. Describe how and
3 when you demanded that the defendant(s) deliver or return the property, and what
4 response you received from the defendant(s). Attach a copy of any written
5 correspondence with the defendant(s), if such copies exist.

6 _____
7 _____
8 _____

9 **V. RELIEF**

10 *State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do*
11 *not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing*
12 *at the present time. Include the amounts of any actual damages claimed for the acts alleged and*
13 *the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts,*
14 *and the reasons you claim you are entitled to actual or punitive money damages.*

13 _____
14 _____
15 _____

16 **VI. CERTIFICATION AND CLOSING**

17 Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my
18 knowledge, information, and belief that this complaint: (1) is not being presented for an improper
19 purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;
20 (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or
21 reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so
22 identified, will likely have evidentiary support after a reasonable opportunity for further
23 investigation or discovery; and (4) the complaint otherwise complies with the requirements of
24 Rule 11.

1 I agree to provide the Clerk's Office with any changes to my address where case-related
2 papers may be served. I understand that my failure to keep a current address on file with the
3 Clerk's Office may result in the dismissal of my case.

4 Date of signing: _____

5 Signature of Plaintiff _____

6 Printed Name of Plaintiff _____

7 _____

8 Date of signing: _____

9 Signature of Plaintiff _____

10 Printed Name of Plaintiff _____

11 _____

12 Date of signing: _____

13 Signature of Plaintiff _____

14 Printed Name of Plaintiff _____

15 _____

16 _____

17 _____

18 _____

19 _____

20 _____

21 _____

22 _____

23 _____

24 _____