

CASE NO. _____

COURT DATE: _____

PLAINTIFF _____

In the Justice Court, Precinct 4

Tarrant County, Texas

VS.

DEFENDANT(S): _____

Amt. of Rent Per Day is \$ _____
TOTAL MONTHLY RENT \$ _____

SWORN COMPLAINT FOR EVICTION FOR MANUFACTURED HOME COMMUNITY

1. This is a suit brought under the Property Code Chapter 94 and the Texas Justice Court Rules of Civil Procedure Section 500 for the Eviction of Tenant(s) with a written lease in a manufactured home community by a Landlord. The Landlord is not the owner of the manufactured home or recreational vehicle. The owner/lienholder of the manufactured home or recreational vehicle is: _____
Address is: _____.

2. Plaintiff is the Landlord (owner or manager of the manufactured home community) or the employee or agent of the Landlord.

3. **COMPLAINT.** Plaintiff (Landlord) hereby complains of the defendant(s) (tenants) named above for withholding possession of Plaintiff's premises (including the manufactured home lot, any area or facility the lease authorizes the Tenants to use, and the appurtenances, grounds, and facilities) located in the above precinct. Address of the property is:

Street Address Lot/Unit No. (if any) City State Zip

4. **SERVICE OF CITATION:** Service is requested on defendants by Personal service at home or work or by alternative service as allowed by the Texas Justice Court Rules of Court. Other service of papers address / addresses (if known) are: _____

5. **UNPAID RENT AS GROUNDS FOR EVICTION:** Plaintiff and Defendant(s) entered into a written lease agreement for the above described premises for occupancy by placement of a manufactured home or recreational vehicle by Defendants on the premises on the ____ day of _____, 20____. Defendant failed to pay rent for the following time period(s): _____ TOTAL DELINQUENT RENT AS OF DATE OF FILING IS: \$ _____

Plaintiff reserves the right to orally amend the amount at trial to include rent due from the date of filing through the date of trial.

6. **HOLDOVER AS GROUNDS FOR EVICTION:** Defendant(s) are unlawfully holding over since they failed to vacate at the end of the rental term or renewal of extension period, which was the ____ day of _____, 20____.

7. **OTHER GROUNDS FOR EVICTION/LEASE VIOLATIONS:** Lease Violations (if other than non-paid rent — list lease violations)

8. **NOTICE TO CURE & NOTICE TO VACATE:** Plaintiff has given defendant(s) a write notice to cure. Such notices was delivered to Defendants on the ____ day of _____, 20____ by personal delivery or by mail. The time to cure has passed and Defendant has not cured. Plaintiff has given Defendants written notice to vacate and demand for possession. Such notice was delivered on the ____ day of _____ and delivered by this method: _____.

9. **ATTORNEY'S FEES:** (Check one) Plaintiff will be ____ or will not be ____ seeking applicable attorney's fees. And the attorney's name, address, telephone, and fax numbers are: _____

10. **BOND FOR POSSESSION:** If Plaintiff has filed a bond for possession, plaintiff requests (1) that the amount of plaintiff's bond and defendant's counter bond be set, (2) that plaintiff's bond be approved by the Court, and (3) that proper notices as required by the Texas Justice Court Rules are given to Defendant(s).

11. **REQUEST FOR JUDGMENT:** Plaintiff prays that defendant(s) be served with citation and that plaintiff have judgment against defendant(s) for: possession of premises, including removal of defendants and defendants' possessions from the premises, unpaid rent as set forth above, attorney's fees, court costs, and interest on the above sums at the rate stated in the rental contract, or if not so stated, at the statutory rate for judgments under the Texas Finance Code Chapter 304.

I give my consent for the answer and any other motions or pleadings to be sent to my email address which is: _____

Print Name

Signature of Plaintiff (Landlord/Property Owner) or Agent

DEFENDANT(S) INFORMATION (if known):

Address of Plaintiff (Landlord/Property Owner) or Agent

DATE OF BIRTH: _____

*LAST 3 NUMBER OF DRIVER LICENSE: _____

*LAST 3 NUMBER OF SOCIAL SECURITY: _____

DEFENDANT'S PHONE NUMBER: _____

City State Zip

Telephone/Fax No. of Plaintiff (Landlord/Property Owner) or Agent

Sworn to and subscribed before me this ____ day of _____, 20 ____.