

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF _____

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In the Matter of the Arbitration of :
Certain Controversies Between : Index No.: _____
_____, :
Petitioner(s), IAS Part _____
: (name of assigned judge)
-against- :
_____, : **VERIFIED PETITION**
Respondent(s).
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Petitioner(s), by and through his attorneys, _____, complaining of the respondent, alleges as follows:

1. Petitioner is a resident of the County of _____, State of New York.
2. Upon information and belief, at all times hereinafter mentioned, the respondent herein transacted business within the County of _____, State of New York.
3. On or about [date], petitioner and respondent entered into an agreement in writing for [insert nature of agreement]. A true copy of the agreement is annexed hereto as Exhibit A.
4. The agreement in issue contains the following arbitration provision:
[insert arbitration clause of agreement]
5. Controversies having arisen with respect to the aforesaid agreement, petitioner, on or about [date], made demand upon the respondent for the submission of these disputes to arbitration before _____ in accordance with the arbitration provision of the agreement. (A copy of the demand is annexed hereto as Exhibit B.) The respondent, however, has failed to consent to arbitration and has neglected and refused to perform his obligations under the aforesaid agreement.
6. Respondent's failure and refusal to perform his contractual obligations is clearly within the scope of the disputes the parties agreed to submit to arbitration.
7. No previous application has been made for the order or relief sought herein to this or any other court or judge.

WHEREFORE, petitioner prays that an order be made directing that arbitration proceed in the manner provided for in the agreement herein set forth, and for such other and further relief as