

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF _____

-----X

Plaintiff,

-against-

VERIFIED COMPLAINT
TO FORECLOSE A
PUBLIC IMPROVEMENT
LIEN

Index No. _____

Defendants.

-----X

Plaintiff, _____, by its attorneys, _____,
complaining of the defendants, hereby alleges:

AS AND FOR A FIRST CAUSE OF ACTION
AGAINST ALL DEFENDANTS

1. At all times hereinafter mentioned, plaintiff, _____ was and is a domestic corporation, organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located at [Address].

2. Upon information and belief, at all times hereinafter mentioned, defendant, _____ was and is a domestic corporation, organized and existing under and by virtue of the laws of the State of New York, with its principal place of business located at [Address].

3. Upon information and belief, at all times hereinafter mentioned, defendant _____ was and is a domestic corporation organized and existing under and by virtue of the laws of the State of New York with its principal place of business located at [Address] and is authorized by the Superintendent of the Department of Insurance of the State of New York to issue surety bonds.

4. Upon information and belief, on or about [date], defendant _____ entered into a contract with defendants, _____ and _____, by which, for the consideration set forth therein, _____ agreed to supply all labor and material sufficient to perform work on a public improvement project for the reconstruction of a portion of _____, Project No. _____. Plaintiff begs leave to refer to said contract for all its terms and conditions as if the