

Complaint Under Corporate Law

Complainant: ABC Solutions Pvt. Ltd.

Respondent: XYZ Pvt. Ltd.

Jurisdiction: National Company Law Tribunal (NCLT)

Complaint Summary:

ABC Solutions Pvt. Ltd. entered into a contract with XYZ Pvt. Ltd. on **March 1, 2024**, for ERP software development worth **₹50,00,000**. Despite project completion and delivery on **October 1, 2024**, XYZ Pvt. Ltd. failed to pay the final installment of **₹20,00,000**.

Legal Grounds:

1. **Breach of Contract** – Non-payment as per agreement under the Companies Act, 2013.
2. **Unjust Enrichment** – Use of delivered software without full payment.
3. **Corporate Fraud** – Intentional default on payment obligations.

Relief Sought:

- Payment of **₹20,00,000** with interest.
- Compensation for financial and legal expenses.

Would you like me to draft this as a formal legal complaint document?