**Commonwealth of Massachusetts  
Trial Court**

**a.** {{ trial\_court.address.county }}, ss: {{ trial\_court }}

**b.** {{ users }} **e.** Civil Docket No.   
Plaintiff(s) - Tenant(s)

vs.

**c.** {{ other\_parties }}  
Defendant(s) - Landlord(s)

**Verified Complaint and Motions   
for Temporary Restraining Order and Preliminary Injunction   
for Protection from Unlawful Eviction, Utility Termination,  
or Breach of Quiet Enjoyment** **G.L. c. 186, §14**

**1.** Name of Plaintiff (the tenant) {{ users }}   
Address (of apartment or rental house where you live) {{ users[0].address.on\_one\_line() }}   
Telephone Number {{ users[0].phone\_numbers() }}

Name of Defendant (the landlord) {{ other\_parties }}   
Address (of landlord) {{ other\_parties[0].address.on\_one\_line() }}  
Telephone Number {{ other\_parties[0].phone\_number }}

{%p if landlord\_subject\_to\_consumer\_protection\_law %}

1. The Defendant/landlord is in the business of being a landlord, in that:
   1. {%p if commercial\_landlord\_factors['landlord\_lives\_elsewhere'] %}
   2. The landlord does not live in the building.
   3. {%p endif %}
   4. {%p if commercial\_landlord\_factors['more\_than\_4\_units'] %}
   5. The building has more than 4 units.
   6. {%p endif %}
   7. {%p if commercial\_landlord\_factors['landlord\_owns\_multiple\_buildings'] %}
   8. The landlord owns multiple buildings for the purposes of rental income.
   9. {%p endif %}
   10. {%p if commercial\_landlord\_factors['is\_company'] %}
   11. The landlord is an LLC or company and not an individual landlord.
   12. {%p endif %}
2. {%p if demand\_letter\_sent %}
3. On or about {{ date\_of\_93A\_notice }} I sent the Defendant/landlord a letter demanding a reasonable offer of settlement, pursuant to the consumer protection law, M.G.L. c. 93A.
4. {%p if not got\_93a\_settlement\_offer %}
5. The landlord did not respond to my demand letter with a reasonable offer in settlement within 30 days.
6. {%p endif %}}
7. {%p endif %} {# demand letter sent #}

{%p endif %}

**2.** On or about {{ tenant\_repair\_default\_date }}, the Defendant/landlord:

Failed to make the following repairs:

{%p for category in bad\_conditions %}

* {%p for index, row in bad\_conditions[category].df.iterrows() %}
* {{ row.get('Interview description') }}, {{ row['Sanitary Code Section'] }}
* {%p endfor %}

{%p endfor %}

{%p for claim in verified\_complaint\_claims %}

{%p if verified\_complaint\_claims[claim].has\_claim %}

On or about {{ verified\_complaint\_claims[claim].date }}, {{ verified\_complaint\_claims\_terms[claim] }}. Specifically, {{ fix\_punctuation(verified\_complaint\_claims[claim].details) }}

{%p endif %}

{%p endfor %}

**3.** By engaging in the above acts, the Defendant/landlord has violated the warranty of habitability and breached my right to quiet enjoyment.

**4.** I am entitled to damages in the amount of 3 times my monthly rent, which is $ {{ rent\_amount }} or a percentage abatement of my rent, whichever is greater.

{%p if landlord\_subject\_to\_consumer\_protection\_law %}

1. In addition, the landlord is subject to the provisions of the Consumer Protection Law, M.G.L. c. 93A, and the acts listed above constitute unfair and deceptive trade practices. Therefore I am entitled to treble damages and attorneys fees.

{%p endif %}

THEREFORE, I ask the Court to:

**5.** Issue a Temporary Restraining Order, Preliminary Injunction, and Permanent Injunction restraining and enjoining the Defendant from:

* {%p if verified\_complaint\_claims["illegal lockout"].has\_claim %}
* Denying me possession of the premises.
* {%p endif %}
* {%p if verified\_complaint\_claims["utility shutoff"].has\_claim %}
* Depriving me of my utility service.
* {%p endif %}
* Interfering with my right to quiet enjoyment of the premises and a safe and sanitary apartment.

**6.** Award me money damages for the greater amount of No. 3 or 4 above, plus costs.

{%p if landlord\_subject\_to\_consumer\_protection\_law %}

1. Also, award me treble damages and attorneys fees.

{%p endif %}

**7.** Award such relief as the Court deems appropriate.

**8.** Waive the requirement of Rule 65(c) of the Massachusetts Rules of Civil Procedure that I provide security for the issuance of the above Order(s) because I cannot afford to provide such security.

**9.** Schedule a Preliminary Injunction Hearing prior to the expiration of any Temporary Restraining Order that may be granted.

Respectfully submitted,

{{ users[0].signature\_if\_defined(i) }}  
*Plaintiff's/tenant's signature*

{{ users[0].name.full() }}

{{ users[0].address.block() }}

{{ users[0].phone\_numbers() }}  
{{ users[0].email }}

**10.** **VERIFICATION**

I, {{ users }} *(plaintiff/tenant)*, have personal knowledge of all of the facts stated above and hereby swear under the pains and penalties of perjury that all of those facts are true and accurate.

Date: {{ signature\_date }}

Signature: {{ users[0].signature\_if\_final(i) }}