**Commonwealth of Massachusetts  
Trial Court**

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

Civil Docket No. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

{{ users }}  
Plaintiff(s) - Tenant(s)

vs.

{{ other\_parties }}  
Defendant(s) - Landlord(s)

**Verified Complaint and Request For Emergency Order For Repairs and Other Relief**

Name of Plaintiff (the tenant): {{ users }}   
Tenant’s address: {{ users[0].address.on\_one\_line() }}   
Telephone Number {{ users[0].phone\_numbers() }}  
Email: {{ users[0].email }}

Name of Defendant (the landlord): {{ other\_parties }}   
Landlord’s address: {{ other\_parties[0].address.on\_one\_line() }}  
Telephone Number {{ other\_parties[0].phone\_number }}  
{% if defined("other\_parties[0].email") and other\_parties[0].email %}Email: {{ other\_parties[0].email }} {% endif %}

1. I am seeking help from the Court because the Landlord did the following:
   1. Continues to fail or refuse to make repairs or to comply with the State Sanitary Code, including but not limited to the following problems in my home which still need to be fixed:
      1. {%p for category in bad\_conditions %}
      2. {%p for index, row in bad\_conditions[category].df.iterrows() %}
      3. {{ row.get('Interview description') }}
      4. {%p endfor %}
      5. {%p endfor %}
   2. {%p if complaint\_for\_damages %}
   3. In the past, there were the following bad conditions in my home:
   4. {%p endif %}
   5. {%p if verified\_complaint\_claims["insufficient notice"].has\_claim %}
   6. Failed to give me reasonable advance notice for access to my home.
   7. {%p endif %}
   8. {%p if verified\_complaint\_claims["entered without permission"].has\_claim %}
   9. Came into my home without my permission.
   10. {%p endif %}
   11. {%p if verified\_complaint\_claims["utility no agreement"].has\_claim %}
   12. Failed to pay for my {{ complaint\_utility\_not\_paid.true\_values() }} utilities without an express written agreement requiring me to pay for utilities. (Under the State Sanitary Code, the landlord is responsible for all utilities unless there is a lease or writing making the tenant responsible for one or more utilities.) I do not have a written utility agreement with my Landlord.
   13. {%p endif %}
   14. {%p if verified\_complaint\_claims["utility shutoff"].has\_claim %}
   15. Caused my {{ complaint\_utility\_shutoff.true\_values() }} to be shut off.
   16. {%p endif %}
   17. {%p if verified\_complaint\_claims["other"].has\_claim %}
   18. My landlord also violated the law when they {{ fix\_punctuation(verified\_complaint\_claims[i].details) }}
   19. {%p endif %}
2. I am seeking an order from the Court because the Landlord’s actions and failure to make repairs are causing me harm by making my home unhealthy, unsafe, or causing me distress.
3. I also need immediate relief because the Landlord’s behavior is causing me harm by:
   1. {%p if tenant\_gets\_rent\_subsidy and tenant\_subsidy\_is\_voucher and verified\_complaint\_tenant\_voucher\_at\_risk %}
   2. Putting my housing voucher at risk because the housing authority will not continue a contract with the Landlord unless my home meets the housing quality standards.
   3. {%p endif %}
   4. {%p if verified\_complaint\_other\_emergency\_basis | length > 0 %}
   5. {{ verified\_complaint\_other\_emergency\_basis }}
   6. {%p endif %}
4. {%p if landlord\_subject\_to\_consumer\_protection\_law %}
5. The landlord is also subject to the Consumer Protection Act (G.L. c. 93A) because they are 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 %}
6. {%p if demand\_letter\_sent %}
7. 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.
8. {%p if not got\_93a\_settlement\_offer %}
9. The landlord did not respond to my demand letter with a reasonable offer in settlement within 30 days.
10. {%p endif %}}
11. {%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 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 $ {{ tenant\_unit\_rent }} 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) }}