IN THE [INSERT COUNTY] DISTRICT COURT
STATE OF TEXAS

[PLAINTIFF NAME],
Plaintiff,
v.
[DEFENDANT NAME],
Defendant.

CAUSE NO. [\_\_\_\_\_\_\_\_\_\_]

**COMPLAINT FOR UNAUTHORIZED PRACTICE OF LAW**

Plaintiff [Plaintiff Name], by and through his/her/their undersigned counsel, files this Complaint against Defendant [Defendant Name] and alleges as follows:

**I. PARTIES**

1. Plaintiff [Plaintiff Name] is an individual/entity with standing to bring this action.
2. Defendant [Defendant Name] is an individual who is not a licensed attorney in the State of Texas.

**II. JURISDICTION AND VENUE**

1. This Court has jurisdiction over this matter pursuant to the Texas Government Code and applicable state law.
2. Venue is proper in this Court because the acts complained of occurred within [County Name], Texas.

**III. FACTUAL ALLEGATIONS**

1. Defendant is not licensed to practice law in Texas.
2. On or about [insert date(s)], Defendant engaged in activities that constitute the unauthorized practice of law within Texas. Specifically, Defendant: a. Prepared legal pleadings, contracts, and other legal documents on behalf of [insert name of individual/entity for whom Defendant acted], and b. Provided legal advice and guidance regarding [describe the legal matter, e.g., drafting of a will, handling of a real estate transaction, etc.].
3. Defendant performed the above-described actions on behalf of [insert name of individual/entity] by representing that individual/entity in legal matters before [specify court or administrative agency, if applicable].
4. The actions taken by Defendant required a significant degree of legal skill and knowledge, as they involved the interpretation of legal standards, the application of relevant laws, and the accurate drafting of legal instruments essential to protect the rights and interests of [insert name of individual/entity].
5. Defendant’s conduct clearly falls within the definition of the “practice of law” as defined by Texas Government Code Section 81.101(a), which provides that the practice of law includes preparing pleadings or other documents incident to action or special proceedings, providing legal advice, and representing another in legal matters.

**IV. CLAIM FOR RELIEF – UNAUTHORIZED PRACTICE OF LAW**

1. Plaintiff realleges and incorporates by reference all preceding paragraphs.
2. Defendant’s conduct constitutes the unauthorized practice of law under Texas Government Code Section 81.101(a) because: a. Defendant is not a licensed attorney in the State of Texas; b. Defendant engaged in activities that require the exercise of legal skill or knowledge, including but not limited to the preparation of legal documents and the rendering of legal advice; c. Defendant performed these acts on behalf of another person/entity, thereby misrepresenting his/her/their ability to legally represent or advise; d. As a result of Defendant’s unauthorized practice, there is a substantial risk of harm to the public and to [insert name of individual/entity] who relied on Defendant’s misrepresentations.

**V. PRAYER FOR INJUNCTIVE RELIEF**

1. Plaintiff requests that this Court issue a preliminary and permanent injunction ordering Defendant to immediately cease and desist from engaging in any further acts constituting the unauthorized practice of law and from representing him/herself as having the legal authority to provide legal services in Texas.
2. Plaintiff further requests that the Court award any other relief to which Plaintiff may be entitled, including but not limited to costs of this action and reasonable attorney’s fees.

**VI. DEMAND FOR JURY TRIAL**

1. Plaintiff demands a trial by jury on all issues so triable.

**VII. CONCLUSION**

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in favor of Plaintiff and against Defendant, and grant:

a. A preliminary and permanent injunction enjoining Defendant from engaging in any further unauthorized practice of law; b. Monetary damages as may be appropriate; and c. Such other and further relief as this Court deems just and proper.

Respectfully submitted on this 22nd day of April, 2025.

[Attorney Name], Esq.
[Law Firm Name]
[Address]
[City, State, Zip]
[Telephone Number]
[Facsimile Number]
[Email Address]
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Complaint has been served on Defendant [Defendant Name] in accordance with the applicable Texas Rules of Civil Procedure on this 22nd day of April, 2025.

[Attorney Name], Esq.