



**United States District Court *for the* District of Puerto Rico**

**FORM A**

Plaintiff * vs. * Defendant(s) *	CIVIL NO.    <b>FORECLOSURE OF MORTGAGE</b>
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**COMPLAINT**

Plaintiff(s), by the undersigned attorney(s) allege(s) as follows:

1.

2. On \_\_\_\_\_, for value received, signed and delivered to \_\_\_\_\_ and interest at \_\_\_\_\_ per annum, to be paid in consecutive monthly \_\_\_\_\_ installments of \_\_\_\_\_, the first of which became due on \_\_\_\_\_ before Notary \_\_\_\_\_, deed number \_\_\_\_\_.

3. The plaintiff is at present the owner and holder of said note.

4. For the purpose of securing the payment or the principal of said note, plus the additional sum of \$ \_\_\_\_\_ for interest, plus the sum of \$ \_\_\_\_\_ for cost, disbursement and attorney's fees, the debtor executed a mortgage upon the following property:  
 (SEE EXHIBIT ATTACHED)

5. Said mortgage was duly \_\_\_\_\_ in the Registry of Property of \_\_\_\_\_ at page \_\_\_\_\_, volume of \_\_\_\_\_, Puerto Rico, estate number \_\_\_\_\_, inscription \_\_\_\_\_, where it still, at this time, appears in full force.

6. It was expressly stipulated that if any one or more of the installments of the mortgage should become due and not paid, then the whole outstanding balance of the debt would be due and payable.

7. The following installments have become due and have not been paid by the defendant(s) nor by any other party on (their) (his) (her) (its) behalf: installments due for the months of \_\_\_\_\_ to \_\_\_\_\_, both inclusive, in the sum of \$ \_\_\_\_\_ each, for principal, interest, and escrow deposit.

8. There is still owing to plaintiff the amount of \$ \_\_\_\_\_ principal, plus interest at \_\_\_\_\_ % per annum from \_\_\_\_\_ to date of full payment.

9. Defendant(s) (is) (are) the owner(s) of the mortgaged property according to the Registry of Property and plaintiff's best knowledge and belief.

WHEREFORE, plaintiff demands judgment as follows:

(a) That defendant(s) pay to plaintiff the sum of \$ \_\_\_\_\_ principal, interest at the rate of \_\_\_\_\_ % per annum, at the daily accrual rate of \$ \_\_\_\_\_ from \_\_\_\_\_ until full payment, any disbursements made by the plaintiff on behalf of the defendant(s) in accordance with the mortgage deed, plus \$ \_\_\_\_\_ for costs, disbursements and attorney's fees, plus any other advances, made by the plaintiff.

(b) Or in default thereof that the property described in paragraph four (4) hereinabove be sold at public auction and that the money due to plaintiff be paid from the proceeds of the sale.

San Juan, Puerto Rico, this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.