

IN THE CIRCUIT COURT OF THE _____ JUDICIAL CIRCUIT
_____ COUNTY, ILLINOIS

Plaintiff,)
)
v.) No.: ___ MR ___
)
Defendants.)

COMPLAINT FOR COMMON LAW WRIT OF CERTIORARI

Plaintiff _____, by its attorneys, _____ hereby complains of Defendant (s) _____
_____, as follows:

1. Plaintiff is [DESCRIBE THE PLAINTIFF IN WAYS THAT HELP SHOW STANDING AND VENUE]
2. Defendant _____ at all times relevant to the matters set forth herein was the [INSERT JOB TITLE OR OFFICE OF ANY INDIVIDUAL DEFENDANT].
3. Defendant [INSERT ANY AGENCY DEFENDANT NAME] at all times relevant to the matters set forth herein was an agency of _____ with offices in _____ County, Illinois.
4. Defendant [IF THIS IS A CASE THAT DETERMINED RIGHTS OF DISPUTING PARTIES, NAME THEM AS DEFENDANTS AND INSERT ALLEGATIONS ABOUT WHO THEY ARE AND THEIR ROLE IN THE DISPUTED ORDER.
5. On [INSERT DATE], Defendant [AGENCY] issued a final order [DESCRIBE BRIEFLY THE NATURE OF THE ORDER AND HOW THE ORDER AFFECTED THE RIGHTS OF THE PLAINTIFF] A true and correct copy of the Order is attached hereto. [ATTACH ANY WRITTEN ORDER IF POSSIBLE]
6. INSERT ALLEGATIONS OF THE STATUTORY DUTIES OR AUTHORITY OF THE DEFENDANTS TO SHOW THEY ARE PROPER ENTITIES FOR THE RELIEF.
7. INSERT FACT ALLEGATIONS THAT LED UP TO THE DECISION OR ORDER THAT IS BEING CHALLENGED.
8. INSERT ANY FACTS THAT ARE RELIED ON AS THE BASIS FOR REVERSAL OR OTHER RELIEF, LIKE FACTS SHOWING NO JURISDICTION OR FACTS THAT ESTABLISH THAT THE DECISION IS CONTRARY TO LAW OR FACTS RELIED ON IN ASSERTING THAT THE DECISION IS ARBITRARY OR AGAINST THE MANIFEST WEIGHT OF THE EVIDENCE.
9. The decision of the Defendants must be reversed for one or more of the following reasons:
 - a. it is contrary to law;
 - b. it is an abuse of discretion;
 - c. the decision is against the manifest weight of the evidence.
 - d. [INSERT ANY OTHER REASON WHY THE DECISION IS CHALLENGED].
10. Defendant was required by law to maintain a record of the entire proceedings in this cause which should be filed with this court for review. [INSERT IF THIS IS TRUE]
11. [PRACTICE TIP: CONSIDER SEEKING A PRELIMINARY INJUNCTION IF WARRANTED TO ACT AS A STAY AND PROTECT THE RIGHTS OF THE PLAINTIFF PENDING A REVIEW OF THE CHALLENGED DECISION.]

WHEREFORE, for one or more of the foregoing reasons, Plaintiff respectfully prays (a) that this court issue a Writ of Certiorari in this cause requiring Defendants to file the record of all matters relating to this decision with the Court; (b) that the Court issue an emergency stay of enforcement of the decision pending review on the merits in this cause; and (c) that the Court review the decision of the Defendants, that the final administrative decision be reversed, and for such other relief as this court deems just.

_____ Plaintiff,

By: _____
Attorney