

NAME OF PLAINTIFF(S) : _____ JUDICIAL DISTRICT COURT

VS. : _____ PARISH, LOUISIANA

NAME OF DEFENDANT(S) : DOCKET NO. _____

PETITION FOR DAMAGES

NOW INTO COURT comes _____, domiciled in _____ Parish, Louisiana, who for the purpose of filing of this Petition, respectfully represents:

1.

Named defendants herein are _____, domiciled in _____, Louisiana, and _____, a foreign insurance company licensed to do business in the State of Louisiana who has designated the Secretary of State as its agent of first service of process.

2.

Petitioner avers that on the _____ day of _____ 20____, she/he was operating a vehicle in a northerly direction on _____ in _____ Parish, Louisiana, when all of a sudden and without warning a vehicle owned and operated _____, which was traveling in a _____ direction, swerved into the _____ bound lane of traffic, causing a collision.

3.

As a result of the accident, petitioner has suffered injuries to her neck and back, which have required medical treatment.

4.

Petitioner avers that the sole and approximate cause of the accident was the negligence of the defendant, _____, in the following but not exclusive manner:

1. By failing to maintain proper control;
2. By failing to take evasive actions in order to avoid the accident;
3. By failing to see what was necessary to avoid the accident;
4. By failing to keep a proper lookout; and
5. Other acts of negligence which will be shown at the trial.

5.

Petitioner avers that at the time of the accident, the defendant, _____, had issued an automobile liability policy to defendant, _____, which was in full force and effect at the time of the accident.

6.

Petitioner avers that she/he is entitled to compensation for her injuries to include but not exclusively for the following:

1. Pain and suffering, past, present and future;
2. Mental anguish, past, present and future;
3. Loss wages, past, present and future;
4. Reimbursement for all medical expenses;
5. Damage to her vehicle;
6. Loss of use of vehicle; and
7. Reimbursement for towing and storage of vehicle.

WHEREFORE, petitioner prays that after due proceedings had, that there be judgment herein in favor of petitioner, _____, and against the defendants, _____, in solido, in an amount that would adequately compensate petitioner for her/his damages, plus all medical expenses with legal interest thereon from judicial demand until paid and for all costs of these proceedings.

Respectfully Submitted,

Attorney for petitioner

La. Bar Roll No. _____

PLEASE SERVE DEFENDANTS:

through its agent of service of process

through its agent of service of process

