## **COUNTY, MISSISSIPPI**

## PLAINTIFF

VS.

#### NO.

# DEFENDANT

## **COMPLAINT**

COMES NOW , Plaintiff, by and through counsel, and files this Complaint against and for cause of same would state the following:

1. That Plaintiff is an adult resident citizen of County, Mississippi.

2. That the Defendant, , is a non-profit corporation existing and doing business pursuant to the laws of the State of Mississippi. That the Defendant may be served with the process of this Court by service of process upon its registered agent, , , , , , Mississippi or upon such other persons authorized to be served by the Mississippi Rules of Civil Procedure at its business address, , , County, Mississippi.

3. That between , , , and , , Plaintiff sought and received medical treatment at the Defendant's facility in , Mississippi, under the primary care of Dr. , a physician employee of the Defendant. That at all times related hereto, Dr. was the employee of the Defendant and Defendant was and is liable for the actions, omissions and negligence of said employee.

4. That Plaintiff's primary complaints related to , , , and . That these symptoms persisted throughout his/her treatment without a diagnosis of the particular cause of the symptoms, physical illness or condition that afflicted the Plaintiff, notwithstanding Defendant's treatment, by and through its employee, Dr. , medical tests and medications.

5. That on or about , , Plaintiff was treated by physicians who immediately diagnosed, , hospitalized Plaintiff, performed surgery and removed , the largest of which measures x cm. Following the and , Plaintiff made a normal recovery and returned to full normal health.

6. That the Defendant, by and through its employee physician , was negligent in failing to diagnose Plaintiff's medical condition and render treatment consistent with a proper diagnosis.

7. That Defendant's negligence directly and proximately resulted in unnecessary severe physical, mental and emotional pain and suffering and unnecessary medical treatment, tests and expense over a period of twenty months and Plaintiff is entitled to recover damages of from and against the Defendant for said negligence.

WHEREFORE, Plaintiff files this Complaint and demands judgment of, from and against the Defendant in the sum of \$ actual damages together with prejudgment interest and all costs of court accrued herein.

Respectfully submitted,

Attorney for

Of Counsel:

Telephone: MSB # Attorney for