

**IN THE CIRCUIT COURT OF THE JUDICIAL DISTRICT OF
COUNTY, MISSISSIPPI**

PLAINTIFF

V.

NO.

DEFENDANT

COMPLAINT

Comes now the Plaintiff, _____, and files this complaint against the Defendant, _____, and for cause would show unto the Court as follows, to-wit:

1. The Plaintiff is an Adult resident citizen of _____ County, Mississippi, whose address is _____.

1. The Defendant is an adult resident citizen of _____ County, Mississippi, whose address is _____.

2. At all times herein mentioned Defendant, _____, was the owner and operator of a automobile which is the vehicle operated by name defendant driver if different, otherwise type " _____ in the incident complained of.

3. Skip this paragraph if driver is not an employee of _____. On or about date, _____, was the agent, servant and employee of said Defendant and was operating the above-mentioned vehicle within the scope of his employment as an employee of _____.

4. On the date above mentioned, Plaintiff was operating his or her _____ automobile in a safe and prudent manner and was proceeding _____ on _____.

5. Skip unless plaintiff was a passenger on the date above mentioned, Plaintiff, _____, was a passenger in said vehicle being driven by name driver _____ in a direction of travel _____ direction on name of road _____. Due to the careless, reckless and negligent actions of name of

defendant driver _____, said vehicle was involved in a violent collision whereby as a proximate result thereof, Plaintiff sustained severe and disabling injuries.

6. At the time herein complained of, the vehicle was operated by the Defendant who caused briefly describe accident _____ all of which occurred without fault or negligence on the part of the Plaintiff.

7. In addition to the above mentioned acts of negligence, the collision was caused by one or more of the following acts of negligence on the part of name defendant driver _____ :

- a. Failure to yield the right-of-way;
- b. Failure to keep a proper lookout for other traffic;
- c. Failure to maintain the proper degree of control of the vehicle;
- d. Operating the vehicle in an unsafe, unreasonable, reckless or indiscriminate manner without due regard for the safety of others, including the Plaintiff;
- e. Failure to avoid the collision.

8. As a proximate cause of the negligence of the Defendant, Plaintiff was caused, and will be caused in the future, to suffer the following injuries and damages:

- a. Medical, doctor, hospital and drug bills both in the past and reasonably anticipated in the future;
- b. Loss of wage earnings and loss of wage earnings reasonably anticipated in the future;
- c. Loss of wage earning capacity;
- d. Permanent and disfiguring disability;
- e. Severe pain and suffering in the past and the Plaintiff anticipates to experience severe pain and suffering in the future;
- f. Severe pain and disfigurement and disabling injuries to his or her _____ body as a whole;

- g. Deprivation of her or his ability to enjoy a normal life;
- h. Mental anguish and shock to her or his nervous system.

WHEREFORE, Plaintiff demands judgment of and from the Defendant, name defendant(s) , in a sum in excess of the jurisdictional amount of this Court, together with all cost of court and interest from the date of the incident herein complained of.

Respectfully submitted this the day of , 2 .

By:_____

Attorney for