

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

**VS.**

**CAUSE NO.**

**COMPLAINT**

COMES NOW the Plaintiff,           , by and through his/her attorneys,           , a Professional Association, and in support of this Complaint alleges the following:

1.     The Plaintiff            is an adult resident citizen of            County, Mississippi.
2.     The Defendant            is an adult resident citizen of           ,            County, Mississippi, doing business as            and may be served with process at           ,           ,           , in County, Mississippi.
3.     The Defendant            is a corporation organized and existing under the laws of the State of Mississippi, and may be served with process by service upon its agent for process           ,           ,           , Mississippi           .
4.     On or about           ,           , the Plaintiff was a passenger on the back seat of a vehicle operated by           , being operated in a            direction on Mississippi            in County.
5.     The Plaintiff's vehicle was forced off the road and collided with a gas tank owned by the Defendant            and served, filled, and inspected by the Defendant           .
6.     When the Plaintiff's vehicle came to a rest, it was immediately engulfed in flames coming from the hose of the            gas tank. The Plaintiff suffered serious burns as a result.
7.     The gas tank was located on the highway right-of-way and was negligently placed so as to create a hazard for vehicles using the highway.
8.     The Defendant           , the owner of the gas tank, was negligent in maintaining the gas tank on the highway right-of-way in close proximity to the highway creating a danger for traffic using the highway, and was negligent in other respects.
9.     The Defendant            had a duty and obligation to not fill the gas tank if it was negligently installed and created a hazard to the public. Accordingly, the Defendant            filled the gas tank on numerous occasions when it had actual knowledge that the gas tank was located on the highway right-of-way and created a danger to the traveling public.
10.    As a direct and proximate result of the negligence of the Defendants as aforesaid, the Plaintiff suffered severe burn injuries, has incurred substantial medical expense, is

permanently disfigured and scarred, has continuing pain and suffering, and loss of wage-earning capacity.

WHEREFORE, PREMISES CONSIDERED, the Plaintiff demands judgment of and from the Defendants in the amount of \$ \_\_\_\_\_, plus attorney's fees, interest, and costs of court.

Plaintiff hereby respectfully requests a trial by jury on all issues so triable.

DATED, this the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

Respectfully submitted,

---

Attorney for Plaintiff