

IN THE CIRCUIT COURT OF COUNTY, MISSISSIPPI

PLAINTIFF

VS.

NO.

DEFENDANT

COMPLAINT

COMES NOW the Plaintiff, , by and through his/her attorney, and makes this his/her Complaint against and in support thereof would show unto the Court the following:

I.

Plaintiff, , is an adult resident citizen of County, Mississippi, residing at , Mississippi .

Defendant, (hereinafter referred to as " "), is an adult resident citizen of County, Mississippi, residing at , Mississippi, where he/she may be served with process upon this Complaint.

Defendant, was at all times herein complained of the owner and operator of that certain automobile that collided with the rear of Plaintiff's automobile on , .

II.

That on or about , Plaintiff was traveling in a westerly direction along , a public highway and road in County, Mississippi, when he/she stopped his/her automobile at a red light at the intersection of and . Defendant was driving a automobile in a direction on and on approaching the red light at the intersection of and failed to have the said automobile under control and negligently drove the automobile into the rear of Plaintiff's automobile, thereby causing Plaintiff to sustain the injuries and damages hereinafter specified.

That all of Defendants' negligent acts and omissions as described hereinafter were in direct violation of the duty owed by Defendants to Plaintiff, and proximately caused Plaintiff to suffer the damages as hereinafter specified.

III.

Without limiting the general allegations of negligence, Plaintiff specifically alleges that Defendant _____ was negligent in the driving and operation of the said _____ automobile on the occasion complained of in each and all of the following particulars, each of which was a breach of the duty owed to Plaintiff and each of which was a direct and proximate cause and/or contributing cause of the aforesaid collision and the resulting damages sustained by Plaintiff, to-wit:

- a. Failure to drive the automobile at said time and place in a safe and proper manner;
- b. Failure to have the automobile under proper control
- c. Failure to maintain a proper lookout;
- d. Failure to maintain a reasonable distance behind Plaintiff's automobile so as to avoid colliding with Plaintiff's automobile;
- e. In driving and otherwise operating the automobile in a careless, reckless and negligent manner under the conditions then existing;
- f. In driving or otherwise causing the automobile to collide into the rear of Plaintiff's automobile; and
- g. Other acts of negligence to be shown at the trial of this cause.

IV.

That _____ as a direct and proximate result of Defendants' acts and omissions as aforesaid, Plaintiff has suffered and will continue to suffer from the following injuries and damages:

- a. Trauma about his/her head, neck, shoulders and arms;
- b. Strain, sprain injury to his/her cervical, thoracic spine;
- c. Headaches and loss of sleep;
- d. Pain and suffering;
- e. Severe mental anguish;
- f. Nervousness and shock;
- g. Medical and drug expenses not exceeding \$ _____ ;
- h. Lost earnings and wages not exceeding \$ _____ ; and
- i. Loss of ability to perform his/her normal, everyday activities without pain and suffering.

WHEREFORE, Plaintiff demands judgment against Defendant for actual damages in an amount to be determined at the trial of this cause, plus interest and costs.

RESPECTFULLY SUBMITTED,
