

IN THE CIRCUIT COURT OF COUNTY, MISSISSIPPI

, BY AND THROUGH HIS/HER
MOTHER/FATHER
AND NEXT FRIEND, PLAINTIFF

VS.

NO.

DEFENDANT

COMPLAINT

For cause of action against the Defendant, the Plaintiff alleges the following:

I.

Plaintiff, , is a minor residing in County, Mississippi and brings this suit by his/her mother/father and next friend, .

II.

Defendant, , is an adult resident citizen of County, Mississippi and may be served with process of this Court by service on him/her at his/her place of residence which is , Mississippi or , Mississippi in County.

III.

On or about the day of , , the Plaintiff, , was a passenger in the back seat of a owned by and driven by the defendant, , with the permission of , it was involved in a collision with a bridge embankment due to the negligence .

IV.

As a direct and proximate result of the negligence of , the Plaintiff, , sustained serious permanent and painful injuries to his/her body and other damage secondary thereto, including, but not limited to the following:

1. A broken neck;
2. Severe pain and suffering;
3. Medical expenses;
4. Inability to participate in sports of any kind, including gymnastics;
5. Physical therapy expenses;
6. Permanent disability;

- 7. Dental expenses;
- 8. Increased risk of degenerative changes to his/her broken neck above and below the fracture site; and
- 9. Psychological and emotional injuries.

WHEREFORE, Plaintiff demands judgment against the Defendant in the sum of \$ compensatory damages, interest and cost of this action.

RESPECTFULLY SUBMITTED, this the day of , .

, BY AND THROUGH HIS/HER MOTHER/FATHER AND NEXT FRIEND, , PLAINTIFF

BY: _____, Attorney