

IN THE CIRCUIT COURT OF                      COUNTY, MISSISSIPPI

**VS.**

**CIVIL ACTION NO.**

**COMPLAINT  
(JURY TRIAL REQUESTED)**

COMES NOW, Plaintiff, \_\_\_\_\_, by and through counsel, and files this his/her Complaint and in support thereof would show unto the Court the following:

1. Plaintiff is an adult resident citizen of \_\_\_\_\_ County, Mississippi.
2. Defendant, \_\_\_\_\_, is an adult resident citizen of \_\_\_\_\_ County, Mississippi.
3. a. Defendant, \_\_\_\_\_, is a Mississippi corporation which owned and operated the private plane involved in the accident hereinafter described.  
b. Defendant, \_\_\_\_\_, is a Mississippi corporation which owned and operated the private plane involved in the accident herein described.  
c. Defendant, \_\_\_\_\_ is an adult resident citizen of the State of Mississippi who owned and operated the private plane involved in the accident herein described.
- 4.
5. At all times relevant hereto, Defendant, \_\_\_\_\_, was the pilot of the private plane involved in the accident hereinafter described and was an agent of Defendants, \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, and \_\_\_\_\_.
6. On or about \_\_\_\_\_, \_\_\_\_\_, Plaintiff, \_\_\_\_\_, and other employees of \_\_\_\_\_ flew on a private plane from \_\_\_\_\_, Mississippi, to \_\_\_\_\_, \_\_\_\_\_, in order that the Plaintiff might pick up a vehicle owned by \_\_\_\_\_ and drive it to another location. When Plaintiff approached the landing field in \_\_\_\_\_, \_\_\_\_\_, Defendant, \_\_\_\_\_, negligently and carelessly failed to lower the landing gear, causing the plane to impact the runway in a violent manner and causing Plaintiff's head to strike the ceiling of the plane.
7. At all times relevant hereto, the Defendants negligently and carelessly maintained and operated the airplane in which Plaintiff was a passenger. As a direct and proximate result of this negligence and carelessness, Plaintiff received serious personal injuries some of which are permanent. As a result, Plaintiff suffers continuous physical pain and mental distress and suffers a permanent diminished capacity to enjoy life. The negligence exhibited by all Defendants

causing the accident consists of a reckless and willful disregard for the rights and safety of Plaintiff and others and entitle Plaintiff to punitive damages.

8. Plaintiff is entitled to damages against all Defendants to compensate him/her for medical bills for treatment and care both past .

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays for judgment against Defendants in the amount of \$ compensatory damages and \$ exemplary damages.

THIS, the day of , .

RESPECTFULLY SUBMITTED,

BY: \_\_\_\_\_  
Attorney for Plaintiff

OF COUNSEL: \_\_\_\_\_