

IN THE CIRCUIT COURT OF COUNTY, MISSISSIPPI

, A MINOR, BY AND THROUGH PARENTS,  
and , PLAINTIFF

VS.

NO.

DEFENDANT

COMPLAINT

COMES NOW PLAINTIFF, , a minor, by and through his/her parents, and  
, and files this his/her complaint against defendant, , and would show unto this  
honorable court the following, to wit:

I.

That Plaintiff is a minor being years of age, residing with his/her parents  
and who are adult resident citizens of County, Mississippi.

II.

The Defendant, , is an adult resident citizen of County, Mississippi, who  
may be served with process of this court at , Mississippi .

III.

That on or about the day of , Plaintiff was in the care of the  
defendant during a day of preparation for , at which time defendant directed Plaintiff to  
clean windows in the home of defendant, was using a swivel bar stool to stand upon to reach the  
top of a glass door he/she was cleaning, the top of the stool swiveled and the plaintiff fell  
resulting in traumatic injuries.

IV.

The defendant had a duty to the child to use reasonable care to protect him/her from  
harm. The defendant failed to direct the plaintiff in what method should be used to reach the top  
of a glass door, which caused a breach of that duty.

V.

Defendant negligently allowed the plaintiff, a child of tender years, to use a swivel barstool to stand on which resulted as the proximate cause of the injuries sustained by the plaintiff.

VI.

As a direct result of the negligence of the defendant, plaintiff received severe injuries, pain and suffering, and medical and hospital expenses.

WHEREFORE, Plaintiff, sustained serious, painful and permanent injuries to his/her body, from which he/she has suffered, and will continue to suffer, with much pain, from which he/she has incurred, and will continue to incur, hospital, medical and drug expenses.

WHEREFORE, Plaintiff demands judgment against defendant for all damages allowed by law and in an amount to be determined by a jury.

RESPECTFULLY SUBMITTED,

, A Minor

BY: \_\_\_\_\_

,  
Attorney for the Plaintiff

OF COUNSEL:

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