

IN THE CIRCUIT COURT OF COUNTY, MISSISSIPPI

AND , PLAINTIFFS

VS.

NO.

AND , DEFENDANTS

COMPLAINT

COMES NOW, and , Plaintiffs, and file this their Complaint against and and would show unto the Court as follows, to-wit:

1.

Plaintiffs and , husband and wife, are adult resident citizens of County, Mississippi whose address is .

is a Mississippi Corporation qualified to do business in Mississippi whose agent for service of process is .

Defendant is an adult resident citizen of Mississippi whose residence address is unknown to Plaintiffs but who may be served with process of this Court at his place of employment at .

2.

Plaintiff would show that on or about , he was an invitee of Defendant , at its operation located at , where it was doing business as in County, Mississippi. Plaintiff would show that on that date negligently operated a nail stud gun by firing the stud gun causing it to discharge a nail, causing the nail to strike the concrete causing particles of concrete and other material to strike the eye of causing him/her blindness in his/her left eye.

3.

Plaintiff would show that at all times herein complained of, was the agent, servant and employee of is liable for the actions of , Plaintiffs would show that as a result of the negligent actions of , Plaintiff's left eye was damaged resulting in permanent blindness. Plaintiffs would show that the acts of were done in a grossly negligent manner manifesting reckless indifference for the health and safety of others including to entitle the Plaintiffs to an award of exemplary or punitive damages.

4.

Plaintiff would show that as a result of his/her injuries he/she has suffered permanent blindness and disfigurement of the left eye and suffers from a combination of medical problems resulting therefrom.

Plaintiff would show that he/she has been required to seek medical treatment for his/her injuries and has incurred medical expenses and will incur medical expenses in the future. Plaintiff would show that as a result of his/her injuries he/she is no longer able to continue the same employment for which he/she is suited and has lost wages, suffered a loss of wage earning capacity and will suffer a loss of future wages.

5.

Plaintiff would show that he/she has suffered pain and suffering in the past and will experience the same in the future.

6.

Plaintiffs would show that            and            are husband and wife and that he/she has suffered a loss of consortium as a result of the injuries of            .

WHEREFORE, PREMISES CONSIDERED, Plaintiffs sue and demand judgment of and from Defendants, jointly and severally, in the amount of \$            general damages plus \$            punitive or exemplary damages plus attorneys fees plus interest on judgment from the date of the incident plus all costs of court.

Respectfully submitted,

---

ATTORNEYS FOR PLAINTIFFS