

IN THE CIRCUIT COURT OF COUNTY, MISSISSIPPI

PLAINTIFF

VS.

CIVIL ACTION NO.

DEFENDANT

COMPLAINT

Comes , a adult resident citizen of , , and brings this action for self and on behalf of the heirs at law of , namely, , resident citizens of , , against the defendants, , adult resident citizens of County, Mississippi, and , whose name is unknown, but whose true name will be inserted by amendment when it is discovered; Plaintiff is ignorant of the name of the fictitious party at this time, and would show unto the court the following:

Defendants, but 's profession is unknown but is believed to be that of a physician, are licensed physicians in the State of Mississippi.

The matter in controversy exceeds, exclusive of interests and costs, the sum of Dollars, and the damages claimed are within the jurisdictional limits of the Circuit Court of County, Mississippi.

was the of and he/she of the other Plaintiffs herein and all of them together were the sole surviving heirs of . During , Defendant and entered into a patient-doctor relationship and as direct and proximate result thereof, lost his/her life through the medical negligence of and through the negligence of .

lost his/her life on , by reason of the recklessness, carelessness and medical negligence of the Defendants, . As a proximate result of the negligence of the Defendants, Plaintiffs should be awarded damages for the following:

1. The loss of society and companionship of ;
2. The present net cash value at the time of the death of 's life expectancy;
3. Pain and suffering endured by prior to death;
4. All reasonable medical expenses incurred by and reasonable funeral expenses incurred by and/or the estate of

All of which said damages are in excess of _____ Dollars and are within the jurisdictional limits of this court.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs bring this action against the Defendants and demand judgment against _____ in an amount within the jurisdictional limits of this Court and in excess of Ten Thousand Dollars.

Respectfully submitted, this the _____ day of _____, 20____.

ATTORNEYS FOR PLAINTIFF
BY: