

JOHN LAWYER, ESQ.  
12 MAIN STREET  
ANYWHERE, USA  
Attorneys for Plaintiffs

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JOHN DOE AND JANE DOE,

Plaintiff,

vs.

JANE SMITH,

Defendant.

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SUPERIOR COURT OF NEW  
JERSEY  
[insert] COUNTY  
LAW DIVISION

DOCKET NO.:

**CIVIL ACTION**

**COMPLAINT, JURY DEMAND,  
AND DESIGNATION OF TRIAL  
COUNSEL**

Plaintiffs, John Doe and Jane Doe, residing at [insert address], by way of Complaint against the Defendant, say:

**FIRST COUNT - NEGLIGENCE**

1. On or about [insert date], the plaintiff John Doe was the lawful operator of a motor vehicle in the [insert]. At that time the plaintiff was traveling in a westerly direction on [insert].
2. At the same aforementioned time and place the defendant was also operating a motor vehicle operating in the vicinity of the plaintiff's motor vehicle.
3. While plaintiff was lawfully and properly traveling on [insert] suddenly and without warning the defendant maneuvered her vehicle so as to cause the plaintiff to swerve and leave the roadway in order to avoid colliding with the defendant.
4. The defendant so negligently and carelessly operated her motor vehicle so as to cause the plaintiff to drive off the roadway and collide with a utility pole and a tree along the roadside. Said collision caused serious and permanent injuries to the plaintiff.
5. As a direct and proximate result of the aforementioned negligence of the defendant the

plaintiff was seriously and permanently injured, suffered great pain, and in the future will experience great pain and suffering. The plaintiff did also expend, and in the future will be required to expend, diverse sums of money for his treatment and care, and will in the future be prevented from attending to his normal daily activities.

**WHEREFORE**, the plaintiff John Doe demands judgment against the defendant for compensatory damages, attorney=s fees interest, costs of suit and such other relief as the Court deems just and equitable.

### **SECOND COUNT - PROPERTY DAMAGE**

1. The plaintiff Jane Doe repeats and reiterates each and every allegation of the First Count of this Complaint as if same were fully set forth herein at length.
2. The plaintiff Jane Doe is the owner of the vehicle which John Doe was operating on [insert date].
3. As a result of the aforesaid negligence of the defendant the plaintiff=s motor vehicle sustained serious and permanent damage.
4. As a direct and proximate result of the aforesaid negligence on the part of the defendant the plaintiff=s property has been damaged.

**WHEREFORE**, the plaintiff Jane Doe demands judgment against the defendant for compensatory damages, attorney=s fees, interest, costs of suit and such other relief as the Court deems just and equitable.

### **DEMAND FOR TRIAL BY JURY**

Plaintiffs in the within cause of action hereby demand a trial by jury on all issues raised in the Complaint.

### **DESIGNATION OF TRIAL COUNSEL**

Pursuant to Rule 4:5-1(c) John Lawyer, Esq., is hereby designated as trial counsel on behalf of the Plaintiffs.

### **DEMAND FOR DISCOVERY OF INSURANCE COVERAGE**

Pursuant to New Jersey Court Rule 4:10-2(b), demand is made that the defendant disclose to the plaintiffs= attorney whether or not there are any insurance agreements or policies under which any person or firm carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in this action or indemnify or reimburse for payments made to satisfy the judgment and provide the plaintiffs= attorney with true copies of those insurance agreements or policies, including, but not limited to, any and all declaration sheets. The demand shall include and cover not only primary coverage, but also any and all excess, catastrophe and umbrella policies.

### **CERTIFICATION**

I hereby certify that the matter in controversy in this action is not the subject of any other actions pending in any court or of a pending arbitration proceeding except for a matter captioned as [insert], and that no other action or arbitration proceeding is contemplated and no other parties must be joined in this action.

JOHN DOE

Dated: