

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

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JOHN DOE,

Plaintiffs,

vs.

ABC TRUCKING INC., MICHAEL  
SMITH, JAMES DOE., AND ABC  
LIMOUSINE, INC.,

Defendants.

SUPERIOR COURT OF NEW JERSEY  
[insert] COUNTY:LAW DIVISION

DOCKET NO.

**CIVIL ACTION**

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

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Plaintiff, John Doe maintaining his principal place of residence at [insert address] says:  
THE PARTIES

The Plaintiff John Doe is a resident of the State of [insert], County of [insert].  
Upon information and belief, the Defendant ABC Trucking Inc., is a [insert] corporation lawfully  
doing business in the State of [insert]. Its principle place of business is [insert].  
Upon information and belief, the Defendant Michael Smith, at all times referenced herein, was  
an employee of ABC Trucking Inc.  
Upon information and belief, the Defendant ABC Limousine, is a [insert] corporation lawfully  
doing business in the State of [insert].  
Upon information and belief, the Defendant James Doe at all times referenced herein, was the  
driver of the van, owned by ABC Limousine.

**FIRST COUNT**

On [insert date], plaintiff, John Doe, was a passenger in a van owned by Defendant ABC  
Limousine and operated by James Doe. The van was stopped [insert] when the vehicle was  
struck in the rear by a tractor trailer driven by defendant, Michael Smith, and owned by  
defendant ABC Trucking Inc.  
As a direct and proximate result of the aforementioned negligence of the defendants plaintiff was  
seriously and permanently injured, suffered great pain, and in the future will experience great  
pain and suffering. As a result of the foregoing injuries plaintiff will be forced to expend diverse  
sums of money for his treatment and care; and, in the future will experience great pain and  
suffering.

WHEREFORE, Plaintiff demand judgment against the defendants, for compensatory damages,  
attorneys= fees, interest, and costs of suit, as well as any other relief this Court deems just.

**JURY DEMAND**

The Plaintiff hereby demands trial by a jury on all triable issues of this Complaint.

Dated:

JOHN LAWYER

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**DESIGNATION OF TRIAL COUNSEL**

Pursuant to Rule 4:25-4, John Lawyer, Esq., is hereby designated as trial counsel for Plaintiff,  
John Doe, in the above matter.

**CERTIFICATION OF NO OTHER ACTION**

Pursuant to Rule 4:5-1, it is hereby stated that the matter in controversy is not the subject of any other action pending in any other Court or of a pending Arbitration Proceeding to the best of my knowledge or belief. Also, to the best of my belief, no other action or Arbitration Proceeding is contemplated. Further, other than the parties set forth in this pleading, we know of no other parties that should be joined in the above action. In addition, we recognize the continuing obligation of each party to file and serve on all parties and the Court an amended Certification if there is a change in the facts stated in this original Certification.

Dated:

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JOHN LAWYER