

JOHN LAWYER, ESQ.
12 Main Street
Anywhere, USA
Attorneys for ***Plaintiffs***

JOHN AND JANE DOE,

Plaintiffs,

v.

JOHN SMITH AND ABC
MOVING CORP.

Defendants.

SUPERIOR COURT OF NEW JERSEY
[insert] COUNTY
LAW DIVISION

DOCKET NO.: _____

CIVIL ACTION

COMPLAINT, JURY DEMAND AND
DESIGNATION OF TRIAL COUNSEL

Plaintiffs, John and Jane Doe, residing at [insert address], by way of complaint against the defendants state:

FIRST COUNT

1. On [insert date], plaintiff, John Doe, was driving his car and was stopping for the light at the intersection [insert accident information], when his vehicle was struck, in the rear, by a vehicle driven by defendant, John Smith.
2. As a result of the accident, plaintiff, John Doe, incurred painful and severe physical injuries, which required medical treatment. Said injuries have caused him great pain and suffering, will continue to do so in the future, and are permanent in nature.
3. Defendant, was negligent in the operation of his vehicle, because he failed to safely control his vehicle.

WHEREFORE, Plaintiffs demand judgment against the defendant, John Smith, on the First Count of the complaint for damages, interest and costs of suit.

SECOND COUNT

1. Plaintiffs repeat the allegations of the First Count.

2. Upon information and belief, defendant, John Smith was an agent or employee of defendant, ABC Moving Corp., working in the course of his employment or agency, at the time of the accident.

3. As a result of the negligence of defendant, ABC Moving Corp.'s employee or agent, plaintiff John Doe was severely injured.

WHEREFORE, Plaintiffs demand judgment against the defendant, ABC Moving Corp., on the Second Count of the Complaint.

THIRD COUNT

1. Plaintiffs, repeat the allegations of the Second Count.

2. As a result of the injuries suffered by her husband, John Doe plaintiff, Jane Doe, has and will in the future suffer the loss of usual services and consortium of his wife, has been and will be required to provide special services and care for him.

WHEREFORE, plaintiff, Jane Doe, demands judgment against defendants, John Smith and ABC Moving Corp., on the Third Count of the complaint together with interest and costs of suit.

JURY DEMAND

The Plaintiffs, John and Jane Doe hereby demand trial by a jury on all triable issues of this Complaint.

Dated: _____
JOHN LAWYER

DESIGNATION OF TRIAL COUNSEL

Pursuant to rule 4:25-4, John Lawyer, is hereby designated as trial counsel for Plaintiffs, John and Jane 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.

JOHN LAWYER

Dated: _____