

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

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JOHN DOE as Guardians Ad Litem for  
Mary Doe, JOHN DOE, individually, and,  
JANE DOE, individually,

Plaintiffs,

vs.  
DRIVER AND BUS COMPANY,

Defendants.

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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, as Guardians Ad Litem for Mary Doe, and John Doe, individually and Jane Doe, individually, maintaining their principal place of residence at [insert address] say:

**THE PARTIES**

The Plaintiffs John Doe and Jane Doe are residents of the State of [insert] and are husband and wife.

2. Plaintiff Mary Doe is a child born of the marriage of John and Jane Doe. Mary=s birth date is [insert date]

3. Upon information and belief, the Defendant Bus Company, is a New Jersey corporation lawfully doing business in the State of New Jersey. Bus Company offers transportation services to [describe].

4. Defendant Driver is, at all times referenced herein, an employee of Bus Company.

**FIRST COUNT**

1. On [insert date], plaintiff, Mary Doe, was a passenger on a school bus which was

transporting her and other passengers to school. The bus was traveling [insert accident information]. Defendant Driver was the operator of the school bus which was owned by defendant Bus Company.

2. Upon information and belief, defendant Driver was traveling [insert accident information].
3. As a result of the foregoing collision, plaintiff Mary Doe sustained serious, severe, and permanent injuries.
4. As a direct and proximate result of the aforementioned negligence of the defendant the plaintiff Mary Doe 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 Mary Doe was forced to expend diverse sums of money for her treatment and care; and, in the future will experience great pain and suffering.
5. WHEREFORE, Plaintiffs demand judgment against the defendants, Driver and Bus Company, for compensatory damages, attorneys= fees, interest, and costs of suit, as well as any other relief this Court deems just.

#### **JURY DEMAND**

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

Dated:

By: \_\_\_\_\_  
JOHN LAWYER, ESQ.  
Attorney for Plaintiffs

#### **DESIGNATION OF TRIAL COUNSEL**

Pursuant to Rule 4:25-4, John Lawyer, Esq., is hereby designated as trial counsel for Plaintiff, John Doe, as Guardians Ad Litem for Mary Doe, JOHN DOE, individually, and, JANE DOE, individually, 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: March 11, 2020

By: \_\_\_\_\_  
JOHN LAWYER, ESQ.  
Attorney for Plaintiff