

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

JANE DOE,

Plaintiff,

v.

JOHN SMITH,

Defendant.

SUPERIOR COURT OF NEW JERSEY
[insert] COUNTY
LAW DIVISION

DOCKET NO.:

CIVIL ACTION

COMPLAINT, JURY DEMAND AND
DESIGNATION OF TRIAL COUNSEL

Plaintiff, Jane Doe, residing at [insert address] by way of complaint against the defendant states:

FIRST COUNT

1. On [insert date], plaintiff, Jane Doe, was operating her motor vehicle [insert location], when defendant, John Smith, coming from the opposite direction, attempted to make a left turn in front of plaintiff, hitting her car head on.

2. As a result of the accident, plaintiff incurred painful and severe physical injuries [describe injuries], which required medical treatment. Said injuries have caused her great pain and suffering, will continue to do so in the future, and are permanent in nature.

3. Defendant John Smith was negligent in the operation of his automobile because he failed to safely control his vehicle.

WHEREFORE, plaintiff demands judgment against the defendant for damages, interest and costs of suit.

JURY DEMAND

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

Dated:

JOHN LAWYER

DESIGNATION OF TRIAL COUNSEL

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

CERTIFICATION OF NO OTHER ACTION

Pursuant to R. 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:

JOHN LAWYER