

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

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JANE DOE AND JOHN DOE

Plaintiffs,

vs.

JOHN SMITH AND JANE SMITH

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, Jane and John Doe, residing at [insert address], complaining of the defendants state:

**FIRST COUNT**

1. On [insert date], plaintiff, Jane Doe, was walking on the sidewalk in front of [insert address], when she was viciously attacked by defendants= dog.

2. Defendant, John and Jane Smith reside at [insert address].

3. The defendants own the dog that attacked the plaintiff.

4. Defendants are strictly liable for the injuries suffered by plaintiff, Jane Doe, as a result of their dog=s vicious attack, pursuant to [insert statute].

5. As the result of the injuries suffered in the attack, Plaintiff, Jane Doe, was caused to suffer and sustain severe and disabling injuries and has been and will in the future be caused to obtain medical treatment and has been and will in the future be caused to lose time from her work and has been and will in the future be caused to refrain from her normal pursuits.

WHEREFORE, the plaintiff, Jane Doe, demands judgment against said defendants for damages, interest, and costs of suit, jointly and severally, on this First Count.

**SECOND COUNT**

1. Plaintiffs repeat the allegations in the First Count.
2. Defendants were negligent in that they failed to adequately secure and supervise their dog.
3. As a result of their negligence, defendants= dog was able to viciously attack the plaintiff, Jane Doe, causing her severe injuries.

WHEREFORE, plaintiff, Jane Doe, demands judgment against said defendant for damages, interest, and costs of suit, jointly and severally, on the Second Count.

### THIRD COUNT

1. The plaintiffs, Jane Doe and John Doe, repeat the allegations set forth in the Second Count of the complaint.
2. At the time of the accident and presently, the plaintiff, Jane Doe, is the wife of plaintiff, John Doe, and as such he is entitled to her love, services and consortium. All of which he has been deprived of due to the negligence of the defendants.

WHEREFORE, the plaintiff, John Doe, demands judgment against said defendants for damages, interest, and costs of suit, jointly and severally, on this Third Count.

Dated:

\_\_\_\_\_  
JOHN LAWYER

### JURY DEMAND

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

### DESIGNATION OF TRIAL COUNSEL

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