

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

JOHN DOE AND JANE DOE,

Plaintiff,

vs.

THE ESTATE OF JANE SMITH,

Defendants.

SUPERIOR COURT OF NEW JERSEY
[insert] COUNTY
CHANCERY DIVISION
EQUITY

DOCKET NO.: _____

CIVIL ACTION

**VERIFIED COMPLAINT AND
DESIGNATION OF TRIAL COUNSEL**

Plaintiffs, John Doe and Jane Doe, residing at [insert address] by way of Verified Complaint against the Defendant, say:

THE PARTIES

1. Plaintiffs are United State Citizens. Plaintiff Jane Doe is a resident of the State of [insert] and [insert] County. Plaintiff John Doe, is a resident of the State of [insert] and he currently resides at [insert]. Plaintiff Jane Doe is the mother of John Doe.
2. The Plaintiffs are the owner of a single family residential home which is located at [insert address]. The home is also more fully described as being Block [insert], Lot [insert], on the Tax Map of the Township of [insert].
3. The Defendant is the owner of neighboring property which also consists of a one family single home. The address of that [insert address].

COUNT ONE: NEGLIGENCE

4. On or about [insert date], the Plaintiff stopped and went to the above [insert] food store in [insert place]. At this time the Plaintiff was a lawful business invitee legally walking about the aforementioned premises.
5. On the aforesaid day, the Plaintiff was seriously injured when she slipped and fell while walking into the [insert]'s store which was in control of, owned and/or maintained by the Defendants.
6. Plaintiff's fall and the injuries she suffered were proximately caused by the negligence of the Defendants and/or their employees, agents or servants since the Defendants created

a dangerous, hazardous and unsafe condition; failed to maintain the [insert] store and all its common areas in a safe condition; failed to warn the Plaintiff of the dangerous, hazardous and unsafe condition which caused her fall; failed to inspect the premises; failed to provide the Plaintiff with notice of the dangerous, hazardous and unsafe condition; failed to provide adequate lighting; improperly designed the store and its common areas, improperly constructed the premises, and, negligently maintained ownership, control, operation, management and supervision of the store and its common areas.

7. As a result of the aforesaid negligence, the Defendants are liable to the Plaintiff for her injuries which were proximately caused by the aforesaid negligence.
8. As a result of the Defendants' negligence the Plaintiff suffered serious and permanent injuries; was forced to expend diverse sums of money for her treatment and care; and, in the future will experience great pain and suffering.
9. Defendant ABC Corporation is named pursuant to the New Jersey Court Rules as an unidentified potential responsible party when discovery may indicate that others may be potential responsible parties for Plaintiff's damages. R. 4:26-1 et seq.

WHEREFORE, Plaintiff, Jane Doe, demands judgment against all Defendants jointly and severally, for damages, interest, attorney's fees and costs of suit.

DEMAND FOR TRIAL BY JURY

Pursuant to R. 4:35-1, the Plaintiffs in the within cause hereby demand a trial by jury of all issues raised in the complaint.

CERTIFICATION

I hereby certify, pursuant to R. 4:5-1, that the matter in controversy in this action is not the subject of any other action pending in any court or of a pending arbitration proceeding, no other action or arbitration is contemplated and no other parties must be joined in this action.

JOHN LAWYER

Dated: