

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

JANE DOE,

Plaintiff,

vs.

ABC CONDOMINIUM ASSOC., JOHN DOES  
1-100 and ABC COMPANIES 1-20,

Defendant.

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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

Plaintiff, Jane Doe, residing at [insert address], by way of Complaint against the Defendant, says:

### **FIRST COUNT**

Plaintiff is a United States Citizen and resident of New Jersey, residing at [insert address].

Upon information and belief, Defendant, ABC Condominium Assoc., (AABC@), is a [insert] corporation lawfully doing business in the State of [insert]. ABC has the responsibility of maintaining the residential development known as A[insert complex name].@ The Plaintiff=s residence at [insert address] is located within the [insert complex name].

On or about [insert date] the Plaintiff was walking with her dog in a common area within [insert complex]t when she slipped and fell on ice/snow on a sidewalk. At the time Plaintiff was a lawful business invitee legally walking about the aforementioned premises.

The Plaintiff's fall caused her injuries which she suffered as the proximate result of the negligence of the Defendants since the Defendants created a dangerous, hazardous and unsafe condition; failed to maintain the 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 Plaintiff with notice of the dangerous, hazardous and unsafe condition; negligently maintained ownership, control, operation, management and supervision of the common areas.

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.

As a result of the Defendants' negligence, 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.

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

### **SECOND COUNT**

Plaintiff Jane Doe repeats the allegations contained in the First Count of this complaint and incorporates them herein as if they were set forth at length.

Defendants John Does 1-100 are named as fictitious defendants upon information and belief that they participated in or were employed by, or subcontracted under the guidance and control of any named defendants to this action and as such, are liable to Plaintiff for their negligence, misrepresentations, and acts or omissions relating to the development.

As a direct and proximate result of the aforesaid negligence, misrepresentations, acts or omissions of Defendants John Does 1-100 Plaintiff was seriously and permanently injured, suffered great pain, and in the future will experience great pain and suffering. Plaintiff, did expend, and in the future will be required to expend, diverse sums of money for her treatment and care, and will in the future be prevented from attending to her normal daily activities.

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

### **THIRD COUNT**

Plaintiff Jane Doe repeats the allegations contained in the First and Second Counts of this complaint and incorporates them herein as if they were set forth at length.

Defendants ABC Companies 1-20 are named as fictitious defendants upon information and belief that they participated in or were employed by, or subcontracted under the guidance and control of any named defendants to this action and as such, are liable to Plaintiff for their negligence, misrepresentations, and acts or omissions relating to the development.

As a direct and proximate result of the aforesaid negligence, misrepresentations, acts or omissions of defendants ABC Companies 1-20 Plaintiff was seriously and permanently injured, suffered great pain, and in the future will experience great pain and suffering. Plaintiff, did expend, and in the future will be required to expend, diverse sums of money for her treatment and care, and will in the future be prevented from attending to her normal daily activities.

WHEREFORE, Plaintiff, Jane Doe, demands judgment against the Defendants ABC Companies 1-20 for damages, interest, attorney's fees and costs of suit.

### **DEMAND FOR TRIAL BY JURY**

The Plaintiff in the within cause hereby demands a trial by jury of all issues raised in the complaint.

### **DESIGNATION OF TRIAL COUNSEL**

John Lawyer, Esq., is hereby designated as trial counsel in the within matter.

### **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: