

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

JANE DOE AND JOHN DOE,

Plaintiffs,

vs.

TOWNSHIP OF ANYWHERE, and
JOHN DOES 1-100,

Defendants.

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], in the [insert] of [insert], [insert] of [insert], and State of [insert], by way of Complaint against the Defendants, say:

THE PARTIES

1. Plaintiffs are husband and wife, United States Citizens and residents of the State of [insert] and more specifically, [insert] County, [insert].
2. Upon information and belief, the Defendant [insert] is a municipality organized and operating under the laws of the State of [insert] and it operates in [insert] County. The [insert] is also the owner and proprietor of property commonly known as [insert], which is located in the [insert], [insert] County.
3. Upon information and belief, Defendant John Does 1-100 are contractors who were hired by the [insert] to either construct, design, maintain or repair structures within the [insert].

FIRST COUNT

4. On or about [insert], Plaintiff Jane Doe was a lawful invitee in [insert] enjoying a concert which was being held in the park with the permission of the [insert].
5. At or about the aforementioned time and place Jane Doe tripped and fell over an object protruding from the ground in the park, thus sustaining serious injuries.
6. The [insert] so negligently, carelessly, and recklessly maintained, operated, and erected [insert] so as to allow a dangerous condition to exist which ultimately caused injuries to the Plaintiff Jane Doe. At all times the [insert] was aware of this dangerous condition.
7. As a direct and proximate result of the aforementioned negligence of the [insert] Plaintiff Jane Doe was seriously and permanently injured, suffered great pain, and in the future will experience great pain and suffering. Plaintiff, Jane Doe, 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 compensatory damages, attorney=s fees, interest, costs of suit and such other relief as the Court deems just and equitable.

SECOND COUNT

1. Plaintiff Jane Doe repeats and reiterates each and every allegation of the preceding paragraphs including those recited in the First Count of this Complaint, as if same were fully set forth herein at length.
2. Defendants John Does 1-100 are contractors who were hired by the [insert] to either construct, design, maintain or repair structures within the [insert].
3. Defendants John Does 1-100 negligently, carelessly and recklessly constructed, designed, maintained or repaired structures within [insert] such that they created a dangerous condition which would cause harm to all persons who came within contact with the park.
4. As a result of the aforesaid negligence of Defendants John Does 1-100 the Plaintiff Jane Doe suffered serious injuries and sustained damages.

WHEREFORE, Plaintiff Jane Doe demands judgment against the Defendants for compensatory damages, interest, attorney=s fees, costs of suit and such other relief as the Court deems just and equitable.

THIRD COUNT

1. Plaintiff John Doe repeats and reiterates each and every allegation of the preceding paragraphs including those recited in the First and Second Counts of this Complaint as if same were fully set forth herein at length.
2. As a result of the aforesaid negligence of the Defendants, Plaintiff John Doe, as the husband of Plaintiff Jane Doe, has suffered a loss of societal services, companionship, and consortium.
3. As a result of the aforesaid loss the Plaintiff Jane Doe has been damaged.

WHEREFORE, Plaintiff John Doe demands judgment against the Defendants for compensatory damages, interest, attorney=s fees, costs of suit and such other relief as the Court deems just and equitable.

DEMAND FOR TRIAL BY JURY

Plaintiff in the within cause of action hereby demands a trial by jury on all issues raised in the Complaint.

DESIGNATION OF TRIAL COUNSEL

Pursuant to Rule 4:5-1(c) John Lawyer, Esq., is hereby designated as trial counsel on behalf of the plaintiff.

CERTIFICATION

I hereby certify that the matter in controversy in this action is not the subject of any other actions pending in any court or of a pending arbitration proceeding, no other action or arbitration proceeding, no other action or arbitration is contemplated and no other parties must be joined in this action.

DATED:

JOHN LAWYER