

IN THE _____ COURT OF _____ (County),
_____ (State)

(Name of Plaintiff)

PLAINTIFF

V.

CAUSE NO. _____

DEFENDANTS

(Names of Defendants)

COMPLAINT

COMES NOW _____ (Name of Plaintiff), Plaintiff
in the above-styled and numbered cause, by and through his attorney, and files this
Complaint against Defendants, _____
_____ (Names of Defendants), and in support thereof
would show unto the Court the following matters and facts:

I. Plaintiff is an adult resident citizen of _____
_____ (city, county, state).

II. Defendant Alpha is a corporation organized and existing under the laws of the
state of _____, with its principal office located at _____

_____ (street address, city, county, state, zip code), referred to herein as Defendant Alpha
and may be served with process by serving its agent for service of process

_____ (Name) located at _____

_____ (street address, city, county, state, zip code).

III. Defendant Beta is an adult resident citizen of _____
_____ (city, county, state).

IV. Defendant Zeta is an adult resident citizen of _____
_____ (city, county, state).

V. At all times referred to herein, Defendant Beta and Defendant Zeta were
employees of Defendant Alpha and under its direct supervision and acting within the
scope of their responsibilities and duties with said Defendant Alpha.

VI. On _____ (date of injury), at about _____
(time of injury), Defendants Beta and Zeta were dispatched in an ambulance owned
and operated by Defendant Alpha to the home of Plaintiff where he had (reason for
ambulance being dispatched) _____

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VII. While attempting to place Plaintiff on a gurney, *Defendants Beta and Zeta* negligently dropped Plaintiff causing Plaintiff to suffer a broken back (***might describe in more adequate medical terms***) _____.

VIII. Plaintiff's injuries were proximately caused by the carelessness and negligence of *Defendants Beta and Zeta*, agents of *Defendant Alpha*.

IX. *Defendants Beta and Zeta* were not trained paramedics and this lack of training was known by *Defendant Alpha*.

X. As a further direct and proximate result of having sustained the above-mentioned injuries, Plaintiff was obliged to incur expenses for X-rays, medical care, medicines, hospital care, and nursing care.

XI. As a further direct and proximate result of having sustained the injuries, Plaintiff endured great pain and suffering, loss of sleep and appetite and was in a habitual nervous condition.

XII. Plaintiff's injuries are of a permanent and lasting nature.

WHEREFORE, *Plaintiff* requests judgment against ***Defendants***, jointly and severally:

1. In the amount of \$_____, as damages;
2. Awarding *Plaintiff* the costs of this action; and
3. Granting *Plaintiff* such other and further relief as the Court deems just and proper.

Respectfully Submitted,

Name of Plaintiff

By: _____
Name of Attorney

Bar No. _____

Of Counsel:

Attorney for Plaintiff
Post Office Box _____

(City, State, Zip Code)

Telephone: _____