

IN THE \_\_\_\_\_ COURT OF \_\_\_\_\_ (County), \_\_\_\_\_ (State)

PLAINTIFF

\_\_\_\_\_  
(Name of Plaintiff)

V.

CAUSE NO. \_\_\_\_\_, \_\_\_\_\_

DEFENDANT

\_\_\_\_\_  
(Name of Defendant)

### Complaint

COMES NOW \_\_\_\_\_ (Name of Plaintiff), Plaintiff in the above-styled and numbered cause, by and through his attorneys, and files this her Complaint against Defendant, \_\_\_\_\_ (Name of Defendant), and in support thereof would show unto the Court the following matters and facts:

1. Plaintiff is an adult resident citizen of \_\_\_\_\_ (city, county, state).
2. Defendant is a corporation organized and existing under the laws of the state of \_\_\_\_\_, with its principal office located at \_\_\_\_\_ (street address, city, state, zip code).
3. At all times mentioned, Defendant operated an ice skating rink, known as \_\_\_\_\_, at \_\_\_\_\_ (street address, city, state, zip code), and gave instructions in skating at the ice skating rink.
4. At all the times mentioned, Defendant had in its employ an instructor of skating known as \_\_\_\_\_ (name of instructor), who gave skating lessons in furtherance of Defendant's business, and who is, and at all times mentioned was, the duly appointed, qualified, and acting agent and employee of Defendant.
5. On or about \_\_\_\_\_ (date), Plaintiff went to Defendant's premises to receive instruction in skating. For a consideration duly paid by Plaintiff, Defendant agreed to furnish Plaintiff an instructor in skating, and assigned \_\_\_\_\_ (name of instructor) to give such instruction.
6. The instructor not only failed to give his time and attention to Plaintiff, but during the course of the instruction, Defendant's instructor recklessly, carelessly, and negligently abandoned Plaintiff while Plaintiff was on the ice rink and was wearing skates, and left her to her own resources for an unreasonable period of time.

7. By reason of such recklessness, carelessness, and negligence of Defendant, its agent, and employee, Plaintiff was unable to stand on the ice in the skating rink and fell. As a proximate result of such negligent conduct, Plaintiff received severe permanent bodily injuries.

8. Plaintiff in no way contributed to the described injuries; the injuries were due to the carelessness and negligence of Defendant, its agent or employee, in not properly attending to Plaintiff while Plaintiff was receiving instruction.

9. By reason of Defendant's negligence, Plaintiff suffered \_\_\_\_\_  
\_\_\_\_\_ (***describe injuries***).

10. Plaintiff has been obliged to incur expenses for medical care and attendance in endeavoring to effect a cure of her injuries, and Plaintiff is informed and believes that she will be obliged to incur further expenses for medical care and attendance and for medicines in effecting such cure, and has been otherwise damaged, all in the sum of \$\_\_\_\_\_.

WHEREFORE, Plaintiff requests judgment against Defendant for:

1. General damages in the amount of \$\_\_\_\_\_;
2. Damages for medical and related expenses in the amount of \$\_\_\_\_\_;
3. Interest according to law;
4. Costs of this action; and
5. Such other and further relief as the Court deems just and proper.
- 6.

Respectfully submitted,

\_\_\_\_\_  
(***Name of Plaintiff***)

By: \_\_\_\_\_  
(***Name of Plaintiff's Attorney***)  
State Bar No. \_\_\_\_\_

Her Attorney

OF COUNSEL:

\_\_\_\_\_  
(***Name of Plaintiff's Attorney***)  
Post Office Box \_\_\_\_\_

\_\_\_\_\_  
**(City, State, Zip Code)**

Telephone: \_\_\_\_\_