

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 attorney, and files this his 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 an adult resident citizen of _____
(city, county, state).
3. On or about _____ (date), Plaintiff was playing golf with Defendant and with two other persons at _____ (name of golf course), located in _____ (name of city, county, state). While Plaintiff and Defendant were so engaged, Defendant hit a golf ball with force and violence, which golf ball struck Plaintiff in the face. As a direct and proximate result of the golf ball driven by Defendant striking Plaintiff, Plaintiff was seriously injured, and Plaintiff sustained permanent injuries to Plaintiff's right eye, including partial loss of vision, and Plaintiff sustained and continues to sustain severe pain and suffering.
4. Plaintiff is informed and believes, and on that information and belief alleges, that Plaintiff's injuries will require medical treatment and probable surgery in the future and will result in eventual total loss of vision in Plaintiff's right eye.
5. Plaintiff's injuries were caused directly and solely by the negligence and carelessness of Defendant, in that Defendant failed to give timely warning to Plaintiff of Defendant's intention to hit the golf ball, and Defendant thereby failed to comply with the rules and customs governing the game of golf.

6. As a direct and proximate result of the negligence of Defendant, Plaintiff incurred, and will in the future incur, expenses for medical care, treatment, and hospitalization, in an amount now unknown to Plaintiff but which Plaintiff will establish at the time of trial.

7. As a further direct and proximate result of the negligence of Defendant, Plaintiff has incurred loss of income, in an amount now unknown to Plaintiff but which Plaintiff will establish at the time of trial.

8. As a further direct and proximate result of the negligence of Defendant, Plaintiff's earning capacity has been permanently impaired, to Plaintiff's damage in an amount now unknown to Plaintiff but which Plaintiff will establish at the time of trial.

9. As a further direct and proximate result of the negligence of Defendant, Plaintiff is permanently and partially disabled, and has suffered and now suffers physical and mental pain and suffering, and will be subject to physical and mental pain and suffering for the rest of Plaintiff's life, to Plaintiff's general damage in the amount of \$ _____ .

WHEREFORE, Plaintiff requests judgment against Defendant for:

1. General damages in the amount of \$ _____ ;
2. Damages for medical care and treatment and hospitalization, past and future, as established at trial;
3. Damages for loss of past income, and loss of future income as a result of reduced earning capacity, as established;
4. Plaintiff's costs and disbursements; and
5. Such other and further relief as the court deems just and proper.

Respectfully submitted,

(Name of Plaintiff)

By: _____
(Name of Plaintiff's Attorney)
State Bar No. _____

His Attorney

OF COUNSEL:

(Name of Plaintiff's Attorney)

Post Office Box _____

(City, State, Zip Code)

Telephone: _____