

IN THE COUNTY COURT OF THE _____ JUDICIAL DISTRICT OF
_____ COUNTY, _____

PLAINTIFF

VS.

CIVIL ACTION NO. _____

DEFENDANT

COMPLAINT
(Jury Trial Requested)

COMES NOW the Plaintiff, _____, hereinafter referred to as "_____", and files this, his Complaint, against the Defendant, _____, hereinafter referred to as "_____", and in support thereof, would show unto the Court the following matters and facts, to-wit:

1. The Plaintiff _____ is an adult resident citizen of _____ County, _____

2. The Defendant, is a legal entity organized and existing under the laws of the State of _____ and may be served with process by serving _____ Executive Director, _____, at _____, _____, _____, or by mail at Post Office Box _____, _____.

3. At approximately _____ p.m. on _____, _____, 20____, while going to retrieve his luggage from a _____ flight from _____, _____, _____ slipped on one of the flights of stairs leading to the first floor of the Airport operated by _____, _____ (A _____ @).

4. At about ____ A.M. the next day, _____ awoke with excruciating pain in his neck. _____ went to see _____-, as soon as he opened his clinic at about _____ for diagnosis and treatment. In addition to injuring his neck, _____ injured his lower back and developed weakness in his right hand that _____ said was related to his fall. _____ also has experienced pain shooting from his right shoulder to his right hand.

5. That at the time of his fall, the stairs were extremely wet and slippery and there was no sign that warned of the wet condition of the stairs. It had been raining in _____ and people from outside had come inside and water had dripped from their shoes, coats and/or umbrellas onto the stairs. It was not raining at the time _____ fell.

6. _____, as the operator of a public airport, owed to _____ a duty to exercise the highest degree of care regarding his safety while in the _____ and using the stairs to the first floor of the _____, and at all other times during which _____ was lawfully using _____ facilities.

7. Defendant, in breach of the duty described above, negligently failed to:

A. Properly maintain the steps on which Plaintiff fell;

B. Remove water from the step on which Plaintiff fell when Defendant knew, _____ or in the exercise of reasonable care should have known, that the stairs _____ were wet and slippery;

C. Warn Plaintiff of the dangerous and hazardous condition of the steps on _____ which Plaintiff fell, which condition Defendant knew or should have _____ known

about; and

D. Otherwise exercise due care with respect to
the matters alleged in this Complaint.

8. As a direct and proximate result of the negligence of Defendant as described above, Plaintiff suffered bodily injury and resulting pain and suffering, disability; mental anguish; loss of capacity for the enjoyment of life; medical expenses, loss of earnings; temporary loss of ability to earn money; and aggravation of a known or unknown previously condition.

WHEREFORE, PREMISES CONSIDERED, Plaintiff does hereby demand judgment against _____ in the amount of \$_____ regarding actual damages and \$_____ in punitive damages, plus reasonable attorneys= fees and court costs.

Respectfully submitted,

____ No. _____

Attorney at law

Telephone - _____
Telefax - _____