

IN THE CIRCUIT COURT OF _____ COUNTY, _____

NAME OF PLAINTIFF

V.

NAME OF DEFENDANT

NO. _____

COMPLAINT

Plaintiff, _____, files her Complaint against Defendant, _____ and in support thereof states as follows:

1.

Plaintiff is an adult resident citizen of the state of _____ residing at _____, _____ County, _____.

2.

Defendant, _____, is a _____ corporation and may be served by serving a copy of this Complaint and Summons on its registered agent for service of process, _____.

3.

On _____ Plaintiff, _____ was in the _____ Store, also known as _____, located on _____ Drive in _____ County, _____. _____ was at the store as a customer and was shopping for household items.

4.

While walking through the store on that day Plaintiff, _____ slipped on some water that was on the floor adjacent to a cooler containing bags of ice. Plaintiff fell and was seriously injured.

5.

Defendant negligently failed to remove the water from the floor, negligently failed to adequately warn the Plaintiff of the concealed defect and otherwise negligently caused Plaintiffs' injuries.

6.

As a proximate result of Defendant's negligence, Plaintiff, _____, suffered personal injuries including physical pain, mental pain and suffering, past and future medical expenses, lost wages and loss of wage earning capacity.

WHEREFORE, Plaintiff demands judgment from the Defendant in the sum of no less than _____ and 00/100 Dollars (\$00.00) with pre-judgment interest from the date of judicial demand, interest on the judgment at the legal rate until paid, and costs of court.

THE PLAINTIFF HEREBY DEMANDS TRIAL BY JURY

Respectfully submitted this the _____ day of _____ 20____.

ATTORNEYS FOR PLAINTIFFS

OF COUNSEL: