

1 [INSERT CAPTION]
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5 COMPLAINT

6 (NEGLIGENCE-AUTOMOBILE-GUEST PASSENGER VS. BOTH DRIVERS)

7 COMES NOW the Plaintiff, [*insert name of plaintiff*], by counsel, and for his (or
8 her) Complaint against the Defendants, [*insert name of defendants*], alleges and states
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10 PARTIES

11 1. The Plaintiff, [*insert name of plaintiff*], (hereinafter referred to as the
12 Plaintiff), at all times relevant hereto, is an adult citizen of the State of [*insert state jurisdiction*]
13 and resides in [*insert county name*].

14 2. The Defendant, [*insert name of driver #1*], (hereinafter referred to as
15 Defendant "), at all times relevant hereto, is an adult citizen of the State of [*insert state*
16 *jurisdiction*] and resides in [*insert county name*].

17 3. The Defendant, [*insert name of driver #2*], (hereinafter referred to as
18 Defendant #2"), at all times relevant hereto, is an adult citizen of the State of [*insert state*
19 *jurisdiction*] and resides in [*insert county name*].
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21 FACTS

22 4. On or about [*insert date*] the Plaintiff was a guest passenger in an [*insert*
23 *description of vehicle*] automobile being operated by Defendant #1 on [*insert name of roadway,*
24 *direction of travel and the nearest intersection or traffic control device or other landmark*],
25 which said roadway is a: [*insert description of roadway and traffic control, e.g., 2 or 4 lane*
26 *roadway, north and south directions, stop lights or stop signs, etc.*]. At said time and place the
27 road and weather conditions were: [*insert road and weather conditions at time of accident*].
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5. At said time and place, Defendant #2 was operating a [insert description of vehicle] automobile on insert name of roadway, direction of travel and the nearest intersection or traffic control device or other landmark], which said roadway is a: [insert description of roadway and traffic control, e.g., 2 or 4 lane roadway, north and south directions, stop lights or stop signs, etc.].

6. At said time and place, Defendant # 1 operated his automobile in a negligent and careless manner by: operated his automobile in a careless and negligent manner by: *[insert description of violation of traffic laws, rules, regulations, rules of the road, etc., e.g., failure to yield right-of-way, failure to keep a proper look out, speeding, failure to keep vehicle under proper control, intoxication, etc.]*.

7. At said time and place, Defendant # 1 operated his automobile in a negligent and careless manner by: operated his automobile in a careless and negligent manner by: *[insert description of violation of traffic laws, rules, regulations, rules of the road, etc., e.g., failure to yield right-of-way, failure to keep a proper look out, speeding, failure to keep vehicle under proper control, intoxication, etc.]*.

8. At said time and place, At said time and place, the automobiles being operated by Defendant #1 and Defendant #2 collided causing the Plaintiff to sustain: *[insert the types of damages, e.g., severe & permanent personal injuries; past, present & future pain & suffering; past, present & future mental anguish; loss of enjoyment of life's activities; permanent or temporary partial/total disability; lost wages, lost or diminished earning capacity, past, present & future medical bills and expenses; etc.].*

CLAIMS

9. The Defendants, and each of them, had a duty to: *[insert traffic statutes, rules, regulations, & ordinances]*.

10. The Defendants, and each of them, breached the duties delineated

1 hereinabove proximately causing or proximately contributing to the cause of the collision and
2 Plaintiff's damages alleged herein.

3 DEMAND FOR RELIEF

4 11. The Plaintiff prays for the following relief:

5 (1) Trial by jury;

6 (2) Judgment for Plaintiff and against Defendants, jointly and severally;

7 (3) An award of damages which will fully and fairly compensate Plaintiff for [*insert*
8 *the types of damages, e.g., severe & permanent personal injuries; past, present &*
9 *future pain & suffering; past, present & future mental anguish; loss of enjoyment*
10 *of life's activities; permanent or temporary partial/total disability; lost wages,*
11 *lost or diminished earning capacity, past, present & future medical bills and*
12 *expenses; etc.].*

13 (4) Such other and further relief deemed just and proper in the premises.
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