

IN THE _____ COURT OF _____ COUNTY
STATE OF _____

Petitioner/Plaintiff,
Vs. _____ NO. _____
Respondent/Defendant

COMPLAINT

Comes now the Plaintiff, _____, and files this complaint against the Defendant, _____, and for cause would show unto the Court as follows, to-wit:

1. The Plaintiff is an adult resident citizen of _____ County, _____, whose address is _____.
2. The Defendant is an adult resident citizen of _____ County, _____, whose address is _____.
3. At all times herein mentioned, Defendant, _____, was the owner and operator of a _____ (*describe automobile*) automobile which is the vehicle operated by _____ in the incident complained of.
4. (*Skip this paragraph if driver is not an employee of Defendant*) On or about _____ day of _____, 20____, _____ was the agent, servant and employee of said Defendant and was operating the above-mentioned vehicle within the scope of his employment as an employee of _____.

5. On the date above mentioned, Plaintiff was operating his/ her automobile in a safe and prudent manner and was proceeding _____ on _____ road/highway.

6. *(Skip unless plaintiff was a passenger)* On the date above mentioned, Plaintiff, _____, was a passenger in said vehicle being driven by _____ in a _____ direction on _____ road/highway. Due to the careless, reckless and negligent actions of _____, said vehicle was involved in a violent collision whereby as a proximate result thereof, Plaintiff sustained severe and disabling injuries.

7. At the time herein complained of, the vehicle was operated by the Defendant who caused _____, all of which occurred without fault or negligence on the part of the Plaintiff.

8. In addition to the above-mentioned acts of negligence, the collision was caused by one or more of the following acts of negligence on the part of _____
(select applicable acts):

- ☐ Failure to yield the right-of-way;
- ☐ Failure to keep a proper lookout for other traffic;
- ☐ Failure to maintain the proper degree of control of the vehicle;
- ☐ Operating the vehicle in an unsafe, unreasonable, reckless or indiscriminate manner without due regard for the safety of others, including the Plaintiff;
- ☐ Failure to avoid the collision.

9. As a proximate cause of the negligence of the Defendant, Plaintiff was caused, and will be caused in the future, to suffer the following injuries and damages *(select applicable injuries/damages):*

- ☐ Medical, doctor, hospital and drug bills both in the past and reasonably anticipated in the future;
- ☐ Loss of wage earnings and loss of wage earnings reasonably anticipated in the future;
- ☐ Loss of wage earning capacity;
- ☐ Permanent and disfiguring disability;
- ☐ Severe pain and suffering in the past and the Plaintiff anticipates to experience severe pain and suffering in the future;
- ☐ Severe pain and disfigurement and disabling injuries to his/ her body as a whole;
- ☐ Deprivation of her/his ability to enjoy a normal life;
- ☐ Mental anguish and shock to her/ his nervous system.

WHEREFORE, Plaintiff demands judgment of and from the Defendant, _____, a sum in excess of the jurisdictional amount of this Court, together with all cost of court and interest from the date of the incident herein complained of \$_____.

Respectfully submitted,

Dated: _____

 Name:
 Title:
 Address:
 Address:
 City, State, Zip:
 Phone:

Fax:
E-Mail:
Attorney No.:

CERTIFICATE OF SERVICE

I, _____, do hereby certify that I have this day mailed,
U.S. Mail, postage prepaid, a true and correct copy of the above and foregoing to
_____, at the following address;

THIS the ____ day of _____, 20____.
