

)	
)	
)	
Petitioner/Plaintiff,)	
)	
Vs.)	
)	
)	
Respondent/Defendant)	
)	

NO. _____

COMES NOW _____ and for cause of action against
_____ alleges as follows:

Plaintiff _____ is an adult resident citizen of _____ County,
_____, and resides at _____, _____ County,
_____.

Defendant is a _____ Corporation and has as its registered agent for service of process _____, who may be served with process at _____, _____, _____ County, _____.

Plaintiff _____ alleges that on or about the ____ day of _____, 20____, she was exiting the _____ building in _____, _____. Said building is owned, occupied and managed by Defendant. As Plaintiff

stepped down from the concrete steps in front of said building, she caught the heel of her shoe in a crack in the concrete, causing her to fall and sustain serious, painful and permanent injuries as hereinafter described. Said crack was higher on one side than the other side, which was deceptive in appearance, and the uneven height contributed to the cause of Plaintiff's fall.

IV.

- a. Negligent failure to warn individuals such as Plaintiff of the hazardous and dangerous condition which then and there existed, which was known or should have been known by defendant.
- b. Failure to maintain the steps in a reasonably safe condition;
- c. Failure to provide a handrail,
- d. Other acts of negligence to be shown at trial which may be learned through discovery.

VI.

Plaintiff _____ alleges that as a result of the negligence of the Defendant, and the aforesaid accident, the Plaintiff sustained a severely fractured right ankle, and as a result thereof had to have surgery and a steel pin inserted. Medical bills thus far have exceeded \$_____. Plaintiff has had to endure grievous pain and suffering as a result of her injury, continues to suffer with her injury at this time, and reasonably believes that she will suffer permanently from her injuries. In addition, Plaintiff reasonably believes that she will require medical treatment in the future for the treatment of said injuries. Plaintiff has suffered permanent disability as a result of her injuries, and will never enjoy the health she enjoyed prior to the subject accident. All such damages are as a result of the negligence of Defendant.

VII.

Plaintiff alleges that the negligent acts of the Defendant were the proximate cause or the proximate contributing cause of the Plaintiff's accident and injuries.

WHEREFORE, PREMISES CONSIDERED, Plaintiff sues and demands judgment of and from _____ in the amount 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____.