

IN THE _____ COURT OF _____ COUNTY
STATE OF _____

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

FIRST AMENDED COMPLAINT

COMES NOW the plaintiffs in the above-styled cause and as for their Complaint, states as follows:

1. Plaintiff, _____ is a resident of _____ County, _____ and is over the age of _____ (__) years.

2. Plaintiff, _____, is a resident of _____ County, _____ and is over the age of _____ (__) years.

3. Defendants, _____, and _____ are residents of _____ County, _____. _____ owned, controlled, and/or had an interest in the vehicle/trip made the basis of this suit.

4. Defendants A, B, C, are those person or persons who owned, controlled or leased the vehicle being driven by _____. Defendants _____, E, F are those person or persons who negligently or wantonly entrusted said vehicle to _____. Defendants G, H, I, are those person or persons who were the principals, employers, and/or had an interest in the trip made the basis of this suit. The true

names and legal identities of A, B, C, _____, E, H, and I are unknown to the plaintiffs at this time but will be added by amendment, individually and jointly, when ascertained, and are liable to the plaintiffs as set forth in the Complaint herein below.

5. On _____ at or around the intersection of _____ Boulevard and _____ Avenue in _____ County, _____, the plaintiffs were operating a vehicle, the defendant, _____, was operating his motor vehicle; defendants A, B, C, owned, controlled and/or leased the _____ vehicle; defendants _____, E, F, negligently or wantonly entrusted the _____ vehicle to defendant _____; and defendants G, H, I, were the principals, employers, and/or had an interest in the trip.

6. Defendants, _____, A, B, C, _____, E, F, G, H, and I, were the agents, servants, or employees of one another or were otherwise engaged in a joint venture with one another.

7. On said date and at said location, defendant _____'s vehicle collided with the vehicle occupied by the plaintiffs thereby causing injuries to the plaintiffs.

COUNT I (NEGLIGENCE)

8. Plaintiffs adopt and incorporate by reference paragraphs 1 through 7 by reference as if fully set out herein.

9. Defendant, _____, negligently operated his vehicle so as to allow it to collide with the vehicle occupied by the plaintiffs thereby causing plaintiffs' injuries.

10. Defendants _____ A, B, C, G, H, and I negligently directed, controlled or allowed the Defendant _____ to operate his vehicle in such a manner so as to cause such vehicle to collide with the vehicle occupied by the plaintiffs.

11. As a proximate consequence and result of the negligence of _____, A, B, C, _____, E, F, G, H, and I, and each of them, individually or jointly, which

combined and concurred, plaintiffs were, knocked, shocked, suffered permanent injuries, suffered permanent disability, incurred medical expenses, will have to incur medical expenses in the future, suffered mental anguish, and will suffer mental anguish in the future, experienced pain and suffering, and will experience pain and suffering in the future, were caused to lose wages and will have a future impairment of earning capacity.

WHEREFORE, plaintiffs demand compensatory damages in excess of the minimal jurisdictional limits of this Court.

COUNT II (WANTONNESS)

12. Plaintiffs adopt and incorporate by reference paragraphs 1 through 7 by reference as if fully set out herein.

13. Defendant, _____, wantonly operated his vehicle so as to allow it to collide with the vehicle occupied by the plaintiffs thereby causing plaintiffs' injuries.

14. Defendants _____ A, B, C, G, H, and I wantonly directed, controlled or allowed the Defendant _____ to operate his vehicle in such a manner so as to cause such vehicle to collide with the vehicle occupied by the plaintiffs.

15. As a proximate consequence and result of the wantonness of _____, A, B, C, _____, E, F, G, H, and I, and each of them, individually or jointly, which combined and concurred, plaintiffs were, knocked, shocked, suffered permanent injuries, suffered permanent disability, incurred medical expenses, will have to incur medical expenses in the future, suffered mental anguish, and will suffer mental anguish in the future, experienced pain and suffering, and will experience pain and suffering in the future, were caused to lose wages and will have a future impairment of earning capacity.

WHEREFORE, plaintiffs demand compensatory and punitive damages in excess of the minimal jurisdictional limits of this Court.

COUNT III

(NEGLIGENT ENTRUSTMENT)

16. Plaintiffs adopt and incorporate by reference paragraphs 1 through 11 by reference as if fully set out herein.

17. Defendants, _____, E, and F negligently entrusted the vehicle defendant _____ was operating to defendant _____ so as to collide with the vehicle occupied by plaintiffs.

18. As a proximate consequence and result of the negligence of _____, A, B, C, _____, E, F, G, H, and I, and each of them, individually or jointly, which combined and concurred, plaintiffs were, knocked, shocked, suffered permanent injuries, suffered permanent disability, incurred medical expenses, will have to incur medical expenses in the future, suffered mental anguish, and will suffer mental anguish in the future, experienced pain and suffering, and will experience pain and suffering in the future, were caused to lose wages and will have a future impairment of earning capacity.

WHEREFORE, plaintiffs demand compensatory damages in excess of the minimal jurisdictional limits of this Court.

COUNT IV

(WANTON ENTRUSTMENT)

19. Plaintiffs adopt and incorporate by reference paragraphs 1 through 7 and 12 through 15 by reference as if fully set out herein.

20. Defendants, _____, E, and F wantonly entrusted the vehicle defendant _____ was operating to defendant _____ so as to collide with the vehicle occupied by plaintiffs.

21. As a proximate consequence and result of the wantonness of _____, A, B, C, _____, E, F, G, H, and I, and each of them, individually or jointly, which combined and concurred, plaintiffs were, knocked, shocked, suffered permanent injuries, suffered permanent disability, incurred medical expenses, will have to incur medical expenses in the future, suffered mental anguish, and will suffer mental anguish in the future, experienced pain and suffering, and will experience pain and suffering in the future, were caused to lose wages and will have a future impairment of earning capacity.

WHEREFORE, plaintiffs demand compensatory damages and punitive damages in excess of the minimal jurisdictional limits of this Court.

PLAINTIFFS DEMAND A TRIAL BY JURY

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____.

Attorney for Plaintiff

**DEFENDANT CAN BE SERVED VIA CERTIFIED MAIL, RETURN RECEIPT
REQUESTED AS FOLLOWS:**

