

IN THE _____ COURT OF _____ COUNTY
STATE OF _____

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

COMPLAINT

COMES NOW Plaintiff, _____, and for cause of action against Defendants would respectfully show:

1. Plaintiff is an adult resident citizen of _____ County, _____, born the ____ day of _____, 20____, and residing at _____, _____.

Defendant _____ is a corporation organized and existing under the laws of the State of _____, doing business as _____ with its principal place of business in _____ County, _____, and whose agent for service of process is _____, at _____, _____.

Defendant _____ is a non-profit corporation organized under the laws of the State of _____ with its principal place of business in _____ County, and whose agent for service of process is _____, at _____, _____.

Defendant Unknown Corporation A ("Corporation A") is a corporation or other business

entity doing business in the State of _____, but whose exact identity is unknown to Plaintiff at this time.

Defendant Unknown Person John Doe ("Doe") is an adult resident citizen of the State of _____, but whose identity and residence address are unknown to Plaintiff at this time.

2. On or about the evening of the ____ day of _____, 20____, Defendant _____ held its annual party on the premises of _____ owned and operated by Defendant _____ in _____ County, _____. During the course of said party, alcoholic intoxicating liquor and beverages was sponsored, provided, served and/or sold to attendees of said party, including but not limited to one _____, deceased, with the knowledge and participation, individually, jointly and in concert of each and all of the Defendants.

3. During all times complained of herein, the serving, sale or consumption of alcoholic intoxicating liquor and beverages was contrary to, and in violation of, applicable statutes, ordinances, laws and regulations of the State of _____ and _____ County.

4. On the occasion complained of, Defendants _____, _____, Corporation A and Doe, individually, jointly and/or in concert, sponsored, supplied, served and/or sold alcoholic intoxicating liquors and beverages to said _____, deceased, then an adult resident citizen of _____ County, _____, both prior to and after the time that said _____, deceased became visibly and dangerously intoxicated.

5. Immediately upon leaving said _____ party, while still in a drunken and highly intoxicated state, said _____, deceased, began driving and operating his

motor vehicle in a drunken, reckless and dangerous manner while proceeding south across _____ Road, whereupon he drunkenly and recklessly swerved his vehicle into the opposite or wrong lane of said road and collided head on with a vehicle being driven by Plaintiff _____. At the time of said collision, and at all times immediately prior thereto, Plaintiff was operating her said vehicle in a lawful, safe and reasonable manner, and in compliance with all applicable rules of the road and traffic rules and regulations.

6. On the occasion complained of Defendant _____, _____, Corporation A and Doe were negligent in that they, acting individually, jointly and/or in concert as aforesaid, provided, supplied, sponsored, encouraged, served and/or sold intoxicating alcoholic beverages and liquor to said _____, deceased:

(a) At a time when said Defendants, and each of them, reasonably knew, or should have known that said _____ had become intoxicated to such an extent as to represent a danger to the public including Plaintiff _____.

(b) In violation of the statutes, ordinances, laws and regulations of the State of _____ and _____ County designed to protect the public and that class of people including Plaintiff _____.

7. As a direct and proximate result of the negligence of Defendants _____, _____, Corporation A and Doe, as aforesaid, which proximately caused or contributed to the afore described collision, Plaintiff _____ sustained serious injuries, losses and damages as follows:

(a) Serious and painful personal injuries including but not limited to contusions, lacerations, concussions, broken bones, abrasions and burns to her body;

(b) Permanent physical disability and limitations to functions of her body;

- (c) Serious, painful and permanent scarring and disfigurement from said trauma and burns to her body;
- (d) Extreme mental and physical pain, suffering, anxiety, anguish and upset;
- (e) Permanent loss and damage to her quality of life and mental and emotional well being; and
- (f) Reasonable and necessary doctor, hospital, dental, medical and related bills and expenses in excess of \$_____.

8. The negligence of Defendants _____, _____, Corporation A and Doe as aforesaid, was so gross, willful, intentional and in such reckless disregard for the safety of Plaintiff, and persons similarly situated, so as to warrant the imposition of punitive damages.

WHEREFORE, PREMISES CONSIDERED, Plaintiff _____ demands judgment of and from Defendants _____, _____, Corporation A and Doe, jointly and severally, in the amount of \$_____ actual damages and \$_____ punitive damages.

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____.
