

IN THE \_\_\_\_\_ COURT OF \_\_\_\_\_ COUNTY  
STATE OF \_\_\_\_\_

_____	)	
	)	
	)	
<b>Petitioner/Plaintiff,</b>	)	
	)	
<b>Vs.</b>	)	<b>NO.</b> _____
	)	
_____	)	
<b>Respondent/Defendant</b>	)	
	)	

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**COMPLAINT**

For cause of action against the Defendant, the Plaintiff alleges the following:

I.

Plaintiff, \_\_\_\_\_, is a minor residing in \_\_\_\_\_ County,  
\_\_\_\_\_ and brings this suit by his mother and next friend, \_\_\_\_\_.

II.

Defendant, \_\_\_\_\_, is an adult resident citizen of \_\_\_\_\_ County,  
\_\_\_\_\_ and may be served with process of this Court by service on him at his place  
of residence which is \_\_\_\_\_, \_\_\_\_\_ or \_\_\_\_\_,  
\_\_\_\_\_ in \_\_\_\_\_ County.

III.

On or about the \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, the Plaintiff,  
\_\_\_\_\_, was a passenger in the back seat of a \_\_\_\_\_ owned by  
\_\_\_\_\_ and driven by the defendant, \_\_\_\_\_, with the permission of  
\_\_\_\_\_, and it was involved in a collision with a bridge embankment due to the

negligence of \_\_\_\_\_.

IV.

As a direct and proximate result of the negligence of \_\_\_\_\_, the Plaintiff, \_\_\_\_\_, sustained serious permanent and painful injuries to his body and other damage secondary thereto, including, but not limited to the following:

1. A broken neck;
2. Severe pain and suffering;
3. Medical expenses;
4. Inability to participate in sports of any kind, including gymnastics;
5. Physical therapy expenses;
6. Permanent disability;
7. Dental expenses;
8. Increased risk of degenerative changes to his broken neck above and below the fracture site; and
9. Psychological and emotional injuries.

WHEREFORE, Plaintiff demands judgment against the Defendant \_\_\_\_\_ in the sum of \$\_\_\_\_\_ compensatory damages, interest and cost of this action.

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\_\_\_\_.

\_\_\_\_\_