

IN THE _____ COURT OF _____ COUNTY
STATE OF _____

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

COMPLAINT

(JURY TRIAL REQUESTED)

COMES NOW, Plaintiff, _____, by and through counsel, and files this
his Complaint and in support thereof would show unto the Court the following:

1. Plaintiff is an adult resident citizen of _____ County, _____.
2. Defendant, _____, is an adult resident citizen of
_____ County, _____.
3. a. Defendant, _____, is a _____ corporation which
owned and operated the private plane involved in the accident hereinafter
described.
b. Defendant, _____, is a _____ corporation which
owned and operated the private plane involved in the accident herein described.
c. Defendant, _____ is an adult resident citizen of the State of
_____ who owned and operated the private plane involved in the
accident herein described.

4. At all times relevant hereto, Defendant, _____, was the pilot of the private plane involved in the accident hereinafter described and was an agent of Defendants, _____, _____, _____, and _____.

5. On or about _____ Plaintiff, _____, and other employees of _____ flew on a private plane from _____, to _____, in order that the Plaintiff might pick up a vehicle owned by _____ and drive it to another location. When Plaintiff approached the landing field in _____, Defendant, _____, negligently and carelessly failed to lower the landing gear, causing the plane to impact the runway in a violent manner and causing Plaintiff's head to strike the ceiling of the plane.

6. At all times relevant hereto, the Defendants negligently and carelessly maintained and operated the airplane in which Plaintiff was a passenger. As a direct and proximate result of this negligence and carelessness, Plaintiff received serious personal injuries some of which are permanent. As a result, Plaintiff suffers continuous physical pain and mental distress and suffers a permanent diminished capacity to enjoy life. The negligence exhibited by all Defendants causing the accident consists of a reckless and willful disregard for the rights and safety of Plaintiff and others and entitle Plaintiff to punitive damages.

7. Plaintiff is entitled to damages against all Defendants to compensate him for medical bills for treatment and care both past and future.

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays for judgment against Defendants in the amount of \$_____ compensatory damages and \$_____ exemplary damages.

THIS, the _____ day of _____ 20____.

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____.
