

IN THE _____ COURT OF _____ COUNTY
STATE OF _____

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

COMPLAINT

COMES NOW, _____ and _____, Plaintiffs, and file this their Complaint against _____ and _____, and would show unto the Court as follows, to-wit:

1. Plaintiffs _____ and _____, husband and wife, are adult resident citizens of _____ County, _____ whose address is _____.

2. _____ is a _____ Corporation qualified to do business in _____, whose agent for service of process is _____.

3. Defendant _____ is an adult resident citizen of _____ whose residence address is unknown to Plaintiffs, but who may be served with process of this Court at his place of employment at _____.

4. Plaintiff would show that on or about the _____ day of _____, 20____, he was an invitee of Defendant _____, at its operation located at _____,

_____, where it was doing business as _____ in _____ County, _____ . Plaintiff would show that on that date, _____ negligently operated a nail stud gun by firing the stud gun causing it to discharge a nail, causing the nail to strike the concrete causing particles of concrete and other material to strike the eye of _____, causing him blindness in his left eye.

5. Plaintiff would show that at all times herein complained of, _____ was the agent, servant and employee of _____, who is liable for the actions of _____, Plaintiffs would show that as a result of the negligent actions of _____, Plaintiff's left eye was damaged resulting in permanent blindness. Plaintiff would show that the acts of _____ were done in a grossly negligent manner manifesting reckless indifference for the health and safety of others including _____, thereby entitling the Plaintiffs to an award of exemplary or punitive damages.

6. Plaintiff would show that as a result of his injuries he has suffered permanent blindness and disfigurement of the left eye and suffers from a combination of medical problems resulting therefrom.

7. Plaintiff would show that he has been required to seek medical treatment for his injuries and has incurred medical expenses and will incur medical expenses in the future. Plaintiff would show that as a result of his injuries he is no longer able to continue the same employment for which he is suited and has lost wages, suffered a loss of wage earning capacity and will suffer a loss of future wages.

8. Plaintiff would show that he has suffered pain and suffering in the past and will experience the same in the future.

9. Plaintiffs would show that _____ and _____ are husband

and wife and that she has suffered a loss of consortium as a result of the injuries of _____.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs sue and demand judgment of and from Defendants, jointly and severally, in the amount of \$_____ general damages plus \$_____ punitive or exemplary damages plus attorneys fees plus interest on judgment from the date of the incident plus all costs of court.

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____.
