

IN THE _____ COURT OF _____ COUNTY
STATE OF _____

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

COMPLAINT

COMES NOW Plaintiffs, _____, a minor, by and through Next of Friend, _____ and _____, individually, and _____ and files this their Complaint against Defendants, _____ and _____ and for cause of action would show unto the Court the following, to-wit:

1. Plaintiff, _____ is a minor and is in Court through his father and next friend, _____. _____ and _____ are the natural parents of the minor, _____. Plaintiffs are resident citizens of _____ County, _____, residing at _____.

2. Defendants _____ and _____ are resident citizens of _____ County, _____, and may be served with process of this Court at _____.

3. On or about the _____ day of _____, 20____, at approximately _____ A.M., Plaintiff, _____, was waiting at _____,

_____ for the school bus to transport him to _____ Elementary School, _____, _____, when, without warning or provocation, a full-grown combination Doberman Pinscher/German Shepherd dog attacked and injured said minor. The dog was unattended and owned by Defendants, _____ and _____.

4. That said dog had a propensity known to Defendants to bite and injure humans, which was unknown to Plaintiffs at the time of the attack. That Defendants should have kept the dog fenced or leashed and failed to do so thereby endangering Plaintiff, _____, and other humans.

5. That Defendants had a duty to keep this dangerous animal away from Plaintiff or anyone else, but Defendants allowed the dog to roam free throughout the neighborhood terrorizing young children and in so doing breached their duty to keep the dog under control thereby proximately causing the injuries sustained by young _____.

6. That as a direct and proximate cause of Defendant's negligence by failing to keep the aforesaid vicious dog under control or fenced, Plaintiffs have sustained serious and permanent injuries, to-wit:

- A. Past, present and future medical expenses for scaring and disfigurement to _____'s face;
- B. Past, present and future psychological and psychiatric damages to _____, _____ and _____;
- C. Past, present and future mental anguish and anxiety of all Plaintiffs;
- D. Permanent scarring of _____'s face, and permanent scarring of his psychological make-up; and
- E. Out-of-pocket expenses and cost incurred in treating, attending and caring for

_____.

7. That as a direct and proximate cause of Defendant's negligence, Plaintiffs have sustained injuries in the amount of at least \$_____; plus attorney's fee, pre-judgment and post judgment interest and all costs of Court.

At all times Defendants, and each and all of them, knew and were well aware that such animal had a violent propensity to bite and attack persons without warning or provocation, yet Defendants failed to warn the Plaintiff of such animal's propensity or protect the Plaintiff from the vicious attack by such animal, and further failed to keep such animal on a leash or other restraint, and as a result, did encourage such animal to attack and bite the Plaintiff. As a direct result of such egregious conduct on the part of the Defendants, and their conscious disregard of the safety and health of the plaintiff, and the resultant injuries and damages caused by their conduct, Plaintiff is entitled to exemplary damages in an amount subject to proof at trial and not less than \$_____.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs, _____, By and Through Next Of Friend, _____ and _____, Individually, and _____, natural parents of _____, a minor, sue and demand judgment of Defendants _____ and _____, jointly and severally, in the amount of at least \$_____ actual damages, punitive damages in the amount of \$_____, plus attorney's fee, pre-judgment and post judgment interest and 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____.
