

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

COMES NOW PLAINTIFF, \_\_\_\_\_, a minor, by and through her parents, \_\_\_\_\_ and \_\_\_\_\_, and files this her complaint against defendant, \_\_\_\_\_, and would show unto this honorable court the following, to wit:

I.

That Plaintiff is a minor being 8 years of age, residing with her parents \_\_\_\_\_ and \_\_\_\_\_, who are adult resident citizens of \_\_\_\_\_ County, \_\_\_\_\_.

II.

The Defendant, \_\_\_\_\_, is an adult resident citizen of \_\_\_\_\_ County, \_\_\_\_\_, who may be served with process of this court at \_\_\_\_\_, \_\_\_\_\_.

III.

That on or about the \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, Plaintiff was in the care of

the defendant during a day of preparation for the Thanksgiving holidays, at which time defendant directed Plaintiff to clean windows in the home of defendant using a swivel barstool to stand upon to reach the top of a glass door she was cleaning. The top of the stool swiveled and the plaintiff fell, resulting in traumatic injuries.

IV.

The defendant had a duty to the child to use reasonable care to protect her from harm. The defendant failed to direct the plaintiff in what method should be used to reach the top of a glass door, which caused a breach of that duty.

V.

Defendant negligently allowed the plaintiff, a child of tender years, to use a swivel barstool to stand on, which resulted as the proximate cause of the injuries sustained by the plaintiff.

VI.

As a direct result of the negligence of the defendant, plaintiff received severe injuries, pain and suffering, and medical and hospital expenses.

WHEREFORE, Plaintiff, sustained serious, painful and permanent injuries to her body, from which she has suffered, and will continue to suffer, with much pain, from which she has incurred, and will continue to incur, hospital, medical and drug expenses.

WHEREFORE, Plaintiff demands judgment against defendant for all damages allowed by law and in an amount to be determined by a jury.

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\_\_\_\_.

\_\_\_\_\_