

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF SUFFOLK

-----X
XXXXXXXXXXXXXXXXXX & XXXXXXXXXXXXXXXXXXXX,

Plaintiff(s),

-against-

XXXXXXXXXXXXXXXXXX,

Defendant(s).
-----X

Index No:

SUMMONS

Plaintiff designates SUFFOLK
County as the place of trial
The basis of venue is:
Plaintiff's Residence
Plaintiffs reside at
XXXXXXXX XXXXXXXX Avenue,
XXXXXXXXXX, New York, XXXXX

TO THE ABOVE NAMED DEFENDANT(S):

YOU ARE HEREBY SUMMONED to answer the Complaint in this action and to serve a copy of your Answer, or, if the Complaint is not served with this Summons, to serve a Notice of Appearance, on the Plaintiff's Attorneys within 20 days after the services of this Summons, exclusive of the day of service (or within 30 days after the service is complete if this Summons is not personally delivered to you in the State of New York). In case of your failure to answer, judgment will be taken against you by default for the relief demanded in the Complaint.

The basis for the venue designated is plaintiff's residence within the County of Suffolk, State of New York.

Dated: XXXXXXXXXXXX, New York
XXXXXXXX X, 2008

THE LAW OFFICE OF JEENA R. BELIL, P.C.

By: _____
JEENA R. BELIL, ESQ.
Attorney for Plaintiffs
XXXXXXXXXXXXXXXXXX & XXXXXXXXXXXXXXXX
XXXXXXXXXXXXXXXXXX
XXXXXXXXXXXXXXXXXX, XXXXXXXX XXXXX
631-445-7380
File No.: XXXXX

Defendant's address: XXXXXXXXXXXXXXX, XXXXXXXX, XXXXXXXX XXXXX

Notice: The nature of this action is a motor vehicle accident

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF SUFFOLK

-----X
XXXXXXXXXXXXXXXXXX & XXXXXXXXXXXXXXXXXXXX,

Index No:

Plaintiff(s),

VERIFIED COMPLAINT

-against-

XXXXXXXXXXXXXXXXXX,

Defendant(s).

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Plaintiffs, XXXXXXXXXXXXXXXXXXXX & XXXXXXXXXXXXXXXXXXXX, by their attorneys, THE LAW OFFICE OF JEENA R. BELIL, P.C., as and for its complaint against defendant, XXXXXXXXXXXX XXXXXXXX, respectfully alleges as follows:

AS AND FOR A FIRST CAUSE OF ACTION

1. At all times mentioned herein, Plaintiff XXXXXXXXXXXX was and still is a resident of the County of Suffolk, State of New York.
2. At all times mentioned herein, Plaintiff XXXXXXXXXXXX was and still is a resident of the County of Suffolk, State of New York.
3. At all times mentioned herein, Defendant XXXXXXXXXXXX was and still is a resident of the County of Suffolk, State of New York.
4. At all times mentioned herein, DEFENDANT was the owner and operator of a certain motor vehicle bearing New York State license plate number XXXXXXXX.
5. At all times mentioned herein, the Plaintiff, XXXXXXXXXXXX, was the owner and operator of a certain motorcycle bearing New York State motorcycle license plate XXXXXXXX
6. At all times mentioned herein, XXXXXXXXX at or near its intersection with XXXXXXXXX Drive, in the County of Suffolk, State of New York, was and still is a public thoroughfare.
7. That on or about the XXst day of XXXXXXXXX, 2008, the motor vehicle owned and operated by the defendant, XXXXXXXXXXXX, bearing license plate number XXXXXXXXX, New York, 2009, came into contact with the motorcycle owned and operated by Plaintiff, XXXXXXXXXXXX, bearing plate number XXXX, New York, 2003.
8. That the aforesaid occurrence was due to the negligence of the Defendant.
9. That the Defendant XXXXXXXXXXXX, was negligent in the ownership, maintenance and control of her motor vehicle thereby causing serious and permanent injuries to the plaintiff, XXXXXXXXXXXX.

10. That the injuries of the plaintiff, XXXXXXXXXXXX, were caused wholly and solely through the negligence of the defendant without any fault on his part contributing thereto.

11. That by reason thereof, the plaintiff, XXXXXXXXXXXX, sustained painful, permanent and disabling personal injuries requiring him to seek and obtain medical care and treatment and disabling him from his normal and usual daily activities.

12. That as a result thereof, plaintiff XXXXXXXXXXXX, was caused to sustain "serious personal injuries" as defined in Section 5102(d) of the Insurance Law of the State of New York.

13. That as a result thereof, plaintiff XXXXXXXXXXXX, has been damaged in the sum of TWO MILLION (\$2,000,000) DOLLARS.

AS AND FOR A SECOND CAUSE OF ACTION

14. That at all times hereinafter mentioned, Plaintiff XXXXXXXXXXXX, repeats, reiterates and realleges each and every allegation contained set forth above in this complaint, with the same force and effect as though more fully set forth at length herein.

15. That at all times hereinafter mentioned, Plaintiff XXXXXXXXXXXX, was the lawful spouse of the Plaintiff, XXXXXXXXXXXX, and as such, said Plaintiff, XXXXXXXXXXXX, was entitled to the society, services and consortium of the said Plaintiff XXXXXXXXXXXX.

16. By reason of the aforementioned negligence of the Defendant, the Plaintiff XXXXXXXXXXXX was deprived of the society, services and consortium of the Plaintiff XXXXXXXXXXXX, and shall forever be deprived of said society, services and consortium.

17. Additionally, by reason of the aforementioned negligence of the Defendant, the Plaintiff XXXXXXXXXXXX has been deprived of certain public retirement benefits which would have been available to her had it not been for the negligence of the Defendant.

18. That by reason of the foregoing negligence on the part of the Defendant, the Plaintiff XXXXXXXXXXXX has been damaged in the amount of FIVE HUNDRED THOUSAND (\$ 500,000) DOLLARS.

WHEREFORE, Plaintiff XXXXXXXXXXXX demands judgment against Defendant in the sum of TWO MILLION (\$2,000,000) DOLLARS on the first cause of action; Plaintiff XXXXXXXXXXXX, demands judgment against the Defendant in the sum of FIVE HUNDRED THOUSAND (\$ 500,000) DOLLARS on the second cause of action together with interest, costs and disbursements of these actions

Dated: XXXXXXXX, New York
XXXXXXXX X, 2008

Yours, etc.,

Jeena R. Belil, Esq.
The Law Office of Jeena R. Belil, P.C.
Attorney for Plaintiffs

XXXXXXXXXX & XXXXXXXXXXXX
XX XXXXXXXXXXXXX
XXXXXXXXXXXX, New York XXXXX
631-445-7380
File No.: XXXXXXXXXXX

VERIFICATION

STATE OF NEW YORK)
 ss:
COUNTY OF SUFFOLK)

XXXXXXXXXX and XXXXXXXXXXXX being duly sworn, deposes and says under penalties of perjury:

We are the Plaintiffs in this action and as such, we are fully familiar with the facts set forth in the foregoing complaint and that the allegations contained therein are true to my own knowledge, except as to matters therein stated to be alleged on information and belief and as to those matters he believes them to be true.

XXXXXXXXXX

XXXXXXXXXX

Sworn to before me this
_____ day of _____

Notary Public