

IN THE CIRCUIT COURT OF Z

X,)			
)			
	Plaintiff,)	No:	_____	
)			
vs.)			
)			
)			
Y,)			
)			
	Defendant.)			

COMPLAINT AT LAW

NOW COMES the Plaintiff, X, by attorneys, ATTORNEY’S OFFICE NAME, and complaining of the Defendant, Y, (hereinafter referred to as “Y”), states as follows:

1. On and prior to DATE, STREET A and STREET B were public roadways in the City of CITY, County of COUNTY, State of STATE.

2. On or about DATE, Plaintiff, X, was operating a YEAR/MAKE/MODEL DIRECTION on STREET A at or near its intersection of STREET B, in the City of CITY, County of COUNTY, State of STATE.

3. At the aforesaid time and place, Defendant, Y, was operating a YEAR/MAKE/MODEL DIRECTION on STREET B at or near its intersection of STREET A, in the City of CITY, County of COUNTY, State of STATE.

4. At the aforesaid time and place, Defendant, Y, owed Plaintiff and others lawfully on the roads a duty to operate a motor vehicle safely and to exercise ordinary care so as to not negligently cause injury to those persons lawfully on the roadway to include Plaintiff herein, X.

5. At the aforesaid time and place, Defendant, Y, while attempting to turn left at the intersection of STREET A and STREET B, drove an automobile into and collided with the

automobile being driven by Plaintiff, X.

6. In breach of a duty of care, Defendant, Y, was guilty of one or more of the following negligent acts and/or omissions:

- (a) operated, maintained and controlled a motor vehicle without keeping a sufficient look-out ahead for vehicles and persons on the roadway;
- (b) Failed to ensure that the intersection was clear of vehicular traffic prior to initiating her left turn;
- (c) failed to yield to the right of way to vehicles traveling in the opposing lane of the intersection before making a left hand turn;
- (d) failed to keep an automobile under control at all times;
- (e) failed to slow or stop the automobile to avoid colliding with the automobile being driven by Plaintiff, X;
- (f) was otherwise careless and negligent.

7. As a direct and proximate result of one or more of the foregoing negligent acts or omissions of Defendant, Y, Plaintiff, X, sustained serious and permanent injuries; was required to seek extensive medical consultation and treatment; has expended, and will in the future expend, great sums of money to be healed and cured of his maladies; suffered, and will in the future continue to suffer, great pain, anguish and physical and mental suffering; and was deprived of earnings to which he might have otherwise been entitled.

8. As a direct and proximate result of one or more of the foregoing negligent acts or omissions of Defendant, Y, Plaintiff, X, sustained damage to the vehicle; has expended, and will in the future expend, great sums of money to fix this vehicle.

WHEREFORE, Plaintiff, X, prays for judgment against Defendant, Y, in such an amount in excess of this Court's jurisdictional requisite as will fairly and adequately compensate Plaintiff for his injuries, losses and damages as herein above alleged, costs of suit, and any further relief

which this Honorable Court finds fair and just.

Plaintiff

Attorney for Plaintiff

Attorney #
Office Name, Address, Phone

IN THE CIRCUIT COURT OF Z

X,

)

)

Plaintiff,

)

No: _____

)

vs.

)

)

Y,

)

)

Defendant.

)

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RULE 222(B) AFFIDAVIT

I, ATTORNEY NAME, being first duly sworn on oath, depose and state that the amount of damages sought in the above-captioned cause of action does not exceed \$ for the Plaintiff.

By: _____

Attorney for Plaintiff

SUBSCRIBED AND SWORN to me before
this ____ day of _____, 2010.

NOTARY PUBLIC

Attorney #
Office Name, Address, Phone