

IN THE _____

JANE DOE	:	
	:	
Plaintiff	:	CASE NO.:
	:	
v.	:	
	:	
WASHINGTON METROPOLITAN AREA TRANSIT AUTHORITY	:	
600 Fifth Street, N.W.	:	
Washington, D.C. 20001	:	
	:	
Serve:	:	
Office of General Counsel	:	
600 Fifth Street, N.W.	:	
Washington, D.C. 20001	:	
	:	
Defendant.	:	

COMPLAINT

COMES NOW, the Plaintiff, JANE DOE, by and through her attorney, and sues THE WASHINGTON METROPOLITAN AREA TRANSIT AUTHORITY, (hereinafter referred to as “Defendant WMATA”), and for causes of action hereby states as follows:

1. Plaintiff JANE DOE is a citizen and resident of Maryland.
2. Defendant WMATA was and is, at all times relevant hereto, a Washington D.C.

Metropolitan Area Transportation System with offices in the District of Columbia and doing business, inter alia, Prince George’s County, Maryland.

3. On or about July 15, 2015, at approximately 2:00 p.m., at Largo Road, Maryland, an agent, servant, and/or employee of Defendant WMATA was operating a Metro Bus, owned by WMATA, the said agent negligently and carelessly failed properly to maintain control of Metro Bus.
4. Said agent, servant and employee of Defendant WMATA while driving the aforementioned Metro Bus hit the vehicle, which the Plaintiff was a driver.
5. Said agent, servant and employee of WMATA, and his principal, WMATA had a duty to operate the involved Metro Bus in as safe and prudent manner so as not to cause any injury to Plaintiff or others.
6. That as a direct and proximate result of the Defendant's negligence, the Plaintiff, has sustained serious bodily injury, medical expenses, pain and suffering.
7. The negligence of WMATA and its agent, servant, and employee included, but was not limited to failing safely to operate the Metro Bus, this violating WMATA safe-operating procedures, and otherwise acting in a negligent manner.
8. At the time of the collision, Plaintiff was conducting herself with due care and in no way contributed to her injuries.

WHEREFORE, the Plaintiff, Jane Doe, demands judgment against the Defendant, **WASHINGTON METROPOLITAN AREA TRANSIT AUTHORITY**, in the sum for Two Hundred Thousand Dollars (\$200,000.00) in compensatory damages, with interest, costs and such other further relief as this Court deems just and proper.

Attorney's Name, Bar#
Attorney for Plaintiff

Address
Phone

JURY DEMAND

Plaintiff demands a trial by a jury as to the issues raised in the Complaint.

Attorney's Name