

IN THE GENERAL DISTRICT COURT FOR FAIRFAX COUNTY

John Doe)	
)	
Plaintiff,)	
v.)	Case No.
Jane Doe)	
Serve: Address of Jane Doe)	
)	
Serve: Address of Registered Agent for Insur Co.)	
)	
Defendants.)	

COMPLAINT

Plaintiff, moves for judgment against the defendant on the grounds and in the amount set forth below:

1. On or about the _____, plaintiff was operating an automobile, owned by him, was making a right turn on _____ in the County of Fairfax, Virginia
2. At the time and place, defendant _____, was operating an uninsured motor vehicle, and suddenly slammed into and rear-ended the plaintiff's vehicle.
3. Defendant had a duty to operate his vehicle with reasonable care and with due regard for others using the road.
4. Notwithstanding these duties, defendant carelessly, recklessly and negligently operated his automobile so that it collided with plaintiff's automobile with great force. Defendant was negligent in that he:

- (a) failed to keep a proper lookout;
 - (b) failed to keep his vehicle under proper control; and
 - (c) operated his vehicle without proper motorist insurance coverage
5. As a direct and proximate result thereof, Plaintiff sustained serious and permanent injuries, has been prevented from transacting her business, has suffered and will continue to suffer great pain of body and mind; has sustained permanent disability and loss of earning capacity; has incurred and will incur in the future hospital, doctor's and related bills in an effort to be cured of said injuries.
6. At the time of this collision, plaintiff was covered as the principal insured under the Uninsured Motorist provisions of a motor vehicle public liability policy issued to him by Allstate Fire and Casualty Insurance Company. Therefore process should issue against Allstate Fire and Casualty Insurance Company pursuant to Va. Code Ann. § 38.2-206(e).

WHEREFORE, plaintiff demands judgment against the defendant is the sum of _____ (\$ ____, 000), and his costs expended in this action, pre and post judgment interest.

Respectfully submitted,

Plaintiff
By Counsel