

VIRGINIA:

IN THE CIRCUIT COURT FOR FAIRFAX COUNTY

Plaintiff,

v.

Serve:
Defendant.

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Case No.:

COMPLAINT

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

THE PARTIES

1. At all times relevant herein Plaintiff, _____ was and is a resident of the Commonwealth of Virginia, residing in Alexandria, Virginia.
2. At all times relevant herein Defendant, _____, was and is a resident of the Commonwealth of Virginia, residing in Alexandria, Virginia.
3. This court maintains jurisdiction over the parties to this action as well as the subject matter hereof and this forum is both proper and convenient.

FACTUAL BACKGROUND

4. On or about _____, Plaintiff was driving his vehicle _____, Fairfax County, Virginia.

5. At the aforesaid time and location, Defendant, _____, was operating her vehicle travelling in the same direction as the Plaintiff.
6. At the aforesaid time and at the aforesaid location, Defendant, _____, suddenly rear-ended into Plaintiff's vehicle.
7. Defendant had a duty to operate her vehicle with reasonable care and with due regard for others using the road.
8. Notwithstanding these duties, defendant carelessly, recklessly and negligently operated her automobile so that it collided with plaintiff's automobile with great force. Defendant was negligent by:
 - (a) Failing to pay full time and attention to her driving; failing to keep a proper lookout;
 - (b) Failing to maintain proper control of her vehicle;
 - (c) Failing to operate her vehicle in a safe manner under the conditions then and there present;
 - (d) Failing to comply with the laws regarding operation of a motor vehicle in the Commonwealth of Virginia.
9. As a direct and proximate result thereof, Plaintiff, _____, sustained serious injuries, has suffered and will continue to suffer great pain of body and mind; has incurred hospital, doctor's and related bills in an effort to be cured of said injuries.

WHEREFORE, Plaintiff, _____, demands judgment against the defendant in the sum of _____ (\$____,000.00), and his costs expended in this action, plus pre and post judgment interest.

Respectfully submitted,

Plaintiff, _____
By Counsel

JURY DEMAND

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

Counsel