COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, ss. SUPERIOR COURT

CIVIL ACTION No.:

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

P NAME, )

Plaintiff, )

)

v. )

)

D NAME, )

Defendant. )

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_)

**COMPLAINT AND DEMAND FOR JURY TRIAL**

**PARTIES**

1. Plaintiff, [P NAME], is an individual who resides in {P CITY}, County of {P COUNTY}, Massachusetts.
2. Defendant, {D NAME}, is an individual who resides in {D CITY}, County of {D COUNTY}, Massachusetts.

**COUNT 1: NEGLIGENCE**

1. The Plaintiff, {P NAME}, realleges and incorporates by reference paragraphs 1 through 2 as fully set forth therein.
2. On [DATE OF ACCIDENT] the Plaintiff, [P NAME], was {the operator/the passenger] of a motor vehicle traveling {directionbound] on {street location} in {CITY, STATE}.
3. Defendant, {D NAME} at the same date and time was operating a motor vehicle [directionbound] on {street location] in {CITY, STATE}.
4. Defendant, {D NAME} failed to exercise due care in the operation of the motor vehicle causing the Defendant’s vehicle to strike the motor vehicle occupied by the Plaintiff, causing an accident.
5. The accident was directly and proximately caused by the negligence of the Defendant.
6. As a result of the Defendant’s negligence, the Plaintiff, {P NAME} was seriously injured, suffered pain and suffering, was required to spend monies for medical care, incurred lost wages and earning capacity, and was unable to attend to usual activities for a prolonged period of time.

WHEREFORE, the Plaintiff demands judgment against the Defendant, {D NAME} in an amount deemed just and appropriate by the trier of facts, together with costs and interest.

**DEMAND FOR JURY TRIAL**

The Plaintiff demands a trial by jury on all counts.

Respectfully submitted,

The Plaintiff,

{P NAME}

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

{P NAME}

{P NAME ADDRESS}

{P NAME PHONE NUMBER}

{P NAME EMAIL}