

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Guy Mackendrick,
Plaintiff

v.

Lois Sadler and
Sterling Cooper, P.C.,
Defendants.

Case No. 20-cv-1234

COMPLAINT FOR
NEGLIGENCE AND
RESPONDEAT SUPERIOR

Plaintiff Guy Mackendrick, and through his undersigned attorneys, alleges as follows:

THE PARTIES

1. The Plaintiff, Guy Mackendrick, is an individual residing in the State of Connecticut.
2. Defendant Lois Sadler is an individual residing in the State of New York.
3. Defendant Sterling Cooper, P.C. is a professional corporation, incorporated and having its principal place of business in New York.

JURISDICTION AND VENUE

4. This court has subject matter jurisdiction over the claims herein under 28 U.S.C. § 1332, because the Plaintiff and Defendants are citizens of different states and the amount in controversy between the Plaintiff and each Defendant, without interest and costs, exceeds the sum or value of \$75,000.
5. Venue is proper in this district under 28 U.S.C. § 1331(b)(2), because a substantial part of the events or omissions giving rise to the claim occurred in this district.

FACTUAL BACKGROUND

6. {Insert factual allegations applicable to all claims}

COUNT I

Negligence (Against Lois Sadler)

7. Plaintiff repeats and realleges the allegations of Paragraphs 1 through __ as if fully set forth herein.

8. {Insert factual and legal allegations specific to this claim}

COUNT II

Respondeat Superior (Against Sterling Cooper P.C.)

9. Plaintiff repeats and realleges the allegations of Paragraphs 1 through __ as if fully set forth herein.

10. {Insert factual and legal allegations specific to this claim}

PRAYER FOR RELIEF

Therefore, Plaintiff demands judgment against Defendants as follows:

1. For compensatory damages, including medical expenses and lost wages;
2. For mental and emotional distress;
3. For punitive damages;
4. For an award of interest, including prejudgment interest, at the legal rate;
5. For costs of suit incurred; and
6. For such other relief as the court deems just and proper.

Date: _____

Respectfully submitted,

FLYWHEEL, SHYSTER, & FLYWHEEL

By: _____

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