IN THE [COURT NAME]  
[COUNTY], [STATE]  
Case No.: [Case Number]

**COMPLAINT  
Plaintiff:** {{client\_name}}  
**Defendant:** {{opposing\_party}}

Plaintiff, by and through undersigned counsel {{attorney\_name}}, alleges and states as follows:

### **Jurisdiction and Venue**

This Court has subject-matter jurisdiction pursuant to [Relevant Statute] because the amount in controversy exceeds {{damages\_amount}}, and the events giving rise to this action occurred within this Court’s jurisdiction. Venue is proper in this Court under [Venue Statute] because the cause of action arose in [County], [State].

### **Parties**

Plaintiff {{client\_name}} is an individual residing at [Plaintiff Address]. Defendant {{opposing\_party}} is a corporation organized under the laws of [State of Incorporation] with its principal place of business at [Defendant Address].

### **Factual Background**

On or about {{incident\_date}}, Defendant engaged in the following conduct: [Fact 1]; [Fact 2]. As a direct and proximate result of Defendant’s conduct, Plaintiff suffered damages estimated at {{damages\_amount}}, including but not limited to medical expenses, lost wages, and pain and suffering.

### **Cause of Action — Negligence**

Plaintiff incorporates by reference the allegations set forth in the preceding paragraphs. Defendant owed Plaintiff a duty of reasonable care, breached that duty by [Breach Description], and that breach was the direct and proximate cause of Plaintiff’s injuries and damages.

### **Prayer for Relief**

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in favor of Plaintiff and against Defendant, awarding compensatory damages in an amount to be proven at trial but not less than {{damages\_amount}}, together with pre- and post-judgment interest as allowed by law, the costs of this action including reasonable attorney’s fees, and such other and further relief as the Court deems just and proper.

Date: {{date}}

Respectfully submitted,

{{attorney\_name}}  
 Counsel for {{client\_name}}  
 [Law Firm Name]  
 [Address]  
 [Phone]  
 [Email]