

IN THE CIRCUIT COURT OF THE ##
JUDICIAL CIRCUIT IN AND FOR
[COUNTY], FLORIDA

[PLAINTIFF],

CASE NO.: ##-#### ##-##

Plaintiff,

GENERAL JURISDICTION

vs.

[DEFENDANT #1], [DEFENDANT #2],
and [DEFENDANT CORPORATION],
a [STATE] corporation,

Defendants.

COMPLAINT

Plaintiff [PLAINTIFF] hereby sues the Defendants, [DEFENDANT #1], [DEFENDANT #2], and [DEFENDANT CORPORATION], and alleges as follows:

INTRODUCTION

1. This is an action for negligence.
2. While operating a motor vehicle owned, maintained or controlled by [DEFENDANT #2] and hauling goods on behalf of [DEFENDANT CORPORATION], [DEFENDANT #1] caused a collision with [PLAINTIFF]'s vehicle. As a result of [DEFENDANT #1]'s negligent operation of the motor vehicle, [PLAINTIFF] suffered permanent injuries.
3. [DEFENDANT #1] is directly liable for [PLAINTIFF]'s damages.
4. [DEFENDANT #2] is directly and vicariously liable for [PLAINTIFF]'s damages.
5. [DEFENDANT CORPORATION] is directly and vicariously liable for

Motor Vehicle Negligence Complaint

ML Morrison



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