

1 [Firm Name]  
[Firm Address]  
2 [Firm Phone Number]  
[Firm Fax]  
3 [Firm Email]  
[Attorney Name and Bar Number]  
4 Attorney for Plaintiff(s)

5 [Trial Court System], [County]

6 **[Plaintiff Name(s)],**

7 Plaintiff(s),

8 v.

9 **[Defendant(s)],**

10 Defendant(s).

Case No.

**COMPLAINT**

(Tort – Motor Vehicle)

11 Plaintiff(s) allege as follows:

12  
13 1. At all times material hereto, Plaintiff, [Plaintiff Name], resided in  
14 [Plaintiff's County of Residence].

15 2. At all times mentioned herein, all Defendants were acting on behalf of  
16 themselves individually and on behalf, and to benefit, the marital community existing  
17 between them and for a family purpose. Further, the true and correct names of Defendants  
18 and their spouses fictitiously designated will be supplied by later amendment.

19 3. All Defendants named herein were or may have been acting in the course  
20 and scope of employment, or agency, for or on behalf of each other, and/or for or on  
21 behalf of Defendants. Further the true and correct names of Defendants and their  
22 principals fictitiously designated will be supplied by later amendment.

23 4. At all times herein, each Defendant was acting in concert, both as an agent  
24 and a principal, for and on behalf of all the other Defendants, so that the acts of one  
25 Defendant were the acts of all Defendants, thus making all the Defendants jointly and  
26 severally liable.

27 5. On or about [Date of the Incident], Defendant negligently caused a car  
28 wreck to take place in [Incident County], [State].

