

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

5 Arizona Superior Court, Maricopa 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:

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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 Maricopa County, Arizona.

