

1 [Firm Name]
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6 [Attorney Name and Bar Number]
7 Attorney for Plaintiff(s)

Arizona Superior Court, Yavapai County

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

9 Plaintiff(s),

10 v.

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

12 Defendant(s).

Case No.

Complaint

(Tort – Motor Vehicle)

13 Plaintiff(s) allege as follows:

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

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

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

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

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

1 6. [Defendant]’s violations of the statute(s), rule(s), and or regulation(s)
2 constitute(s) negligence per se, which directly and proximately caused the accident and
3 Plaintiffs’ damages complained of herein.

4 7. As a direct and proximate result of [Defendant’s] negligence and/or
5 negligence *per se*, Plaintiff suffered, and continue to suffer, damages including, but not
6 limited to:

- 7 a. Physical and emotional injuries, some of which may be permanent;
- 8 b. Physical and emotional pain, discomfort, suffering, disability,
9 disfigurement, and anxiety already experienced and to be experienced in the
10 future;
- 11 c. Loss of enjoyment of life and participation in life’s activities to the quality
12 and extent normally enjoyed before the accident already experienced and to
13 be experienced in the future; and
- 14 d. General, special, incidental, consequential, consortium, compensatory and
15 hedonic damages, the full nature and extent of which are not yet determined,
16 including, but not limited to, medical expenses both past and future.

17 8. As a direct and proximate result of the above, Plaintiffs are entitled to
18 recover damages from Defendants in an amount to be determined at trial, which is in
19 excess of the minimum jurisdictional limits of this Court.

20 **Wherefore**, Plaintiffs pray for judgment against Defendants, jointly and
21 severally, as follows:

- 22 A. For general, special, incidental, consequential, hedonic, consortium and
23 compensatory damages, as alleged above, in amounts to be proven at trial;
- 24 B. For costs incurred herein and accruing;
- 25 C. For interest on the foregoing sums at the statutory rate; and
- 26 D. For such other and further relief as the Court may deem just and proper.

27 Dated this ___ day of _____, [year].

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[Firm Name]

By _____
[Attorney]
[Attorney Address]
Attorney for Plaintiff(s)