

1 [Firm Name]  
2 [Firm Address]  
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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.

