

**IN THE [State or Superior] COURT OF [Insert] COUNTY
STATE OF GEORGIA**

Plaintiff,

Plaintiff,

v.

Defendant,

Defendant.

Case No.

Complaint for Damages

Parties, Jurisdiction, And Venue

1. [Plaintiff] is a citizen of the State of Georgia.
2. Defendant [insert name] (“Defendant”) is a resident of [insert] County, Georgia.
3. Defendant may be served with process at [his/her] residence at [insert].
4. Defendant is subject to the jurisdiction of this Court because [he/she] she is a Georgia resident.
5. Venue is proper in this Court because Defendant resides in [insert] County.

Facts Applicable to All Counts

6. On [date], Plaintiff and Defendant were involved in an automobile Crash in [city], Georgia.
7. [description of crash].
8. [description of crash].
9. [description of crash].
10. Plaintiff suffered injuries because of the Crash.
11. At all relevant times, Plaintiff exercised due care for [his/her] own safety.

Negligence

12. Defendant owed a duty of care to the motoring public in general, and to Plaintiff in particular, to operate a vehicle in a reasonable and prudent manner and to adhere to

the pertinent Rules of the Road for the State of Georgia.

13. The Crash was directly and proximately caused by the negligence of Defendant.
14. The Crash was directly and proximately caused by Defendant's negligence in failing to [insert].
15. The Crash was directly and proximately caused by Defendant's negligence in failing to [insert].
16. The Crash was directly and proximately caused by Defendant's negligence in failing to [insert].
17. The Crash was directly and proximately caused by Defendant's negligence in failing to [insert].
18. Defendant's actions constituted negligence *per se* regarding applicable laws and standards including, but not limited to:
 - 18.1. Failing to [insert], in violation of O.C.G.A. § [insert];
 - 18.2. Failing to exercise due care in [insert], in violation of O.C.G.A. § [insert]; and
 - 18.3. Failing to exercise due care in [insert], in violation of [insert].
19. Plaintiff's personal injuries were directly and proximately caused by Defendant's negligence.

Damages

20. Defendant is liable for Plaintiff's injuries and damages sustained, pain and suffering, and all other elements of damages allowed under the laws of the State of Georgia.
21. Defendant's actions evidence a species of bad faith, were and are stubbornly litigious, and have caused Plaintiff undue expense. Thus, Plaintiff is entitled to recover his necessary expenses of litigation, including an award of reasonable attorney's fees and expenses required by this action, pursuant to O.C.G.A. § 13-6-11, as well as any other statutory or common law basis.
22. Plaintiff seeks to and is entitled to recover for [pick only those that apply]:
 - 22.1. Personal injuries
 - 22.2. Past, present, and future pain and suffering

- 22.3. Disability
- 22.4. Disfigurement
- 22.5. Mental anguish
- 22.6. Loss of capacity for the enjoyment of life
- 22.7. Economic losses
- 22.8. Incidental expenses
- 22.9. Past, present, and future medical expenses
- 22.10. Lost earnings
- 22.11. Loss of earning capacity
- 22.12. Permanent injuries
- 22.13. Consequential damages to be proven at trial.

23. Plaintiff respectfully requests:

- 23.1. Process issue as provided by law
- 23.2. Trial by jury against Defendant
- 23.3. Judgment be awarded to Plaintiffs and against Defendant
- 23.4. Plaintiff be awarded damages in amounts to be shown at trial
- 23.5. Plaintiff have such other relief as this Court deems just and appropriate.

Submitted on [date], by:

[Firm]
[Address]
[Address]
[Address]
[phone]
[fax]
[email]

[name]
Georgia Bar No. #

Attorney for Plaintiff