

Form 1.945 Motor Vehicle Negligence Complaint

Plaintiff, A. B., sues defendants, C. D., and E. F., and alleges:

1. This is an action for damages that (insert jurisdictional amount).

2. (Use a or b)

a. On or about(date)....., defendant, C. D., owned a motor vehicle that was operated with his/her consent by defendant, E. F., at in, Florida.

b. On or about(date)....., defendant owned and operated a motor vehicle at in, Florida.

3. At that time and place defendants negligently operated or maintained the motor vehicle so that it collided with plaintiff's motor vehicle.

4. As a result plaintiff suffered bodily injury and resulting pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, expense of hospitalization, medical and nursing care and treatment, loss of earnings, loss of ability to earn money, and aggravation of a previously existing condition. The losses are either permanent or continuing and plaintiff will suffer the losses in the future. Plaintiff's automobile was damaged and he/she lost the use of it during the period required for its repair or replacement.

WHEREFORE plaintiff demands judgment for damages against defendants.

NOTE: This form, except for paragraph 2b, is for use when owner and driver are different persons. Use paragraph 2b when they are the same. If paragraph 2b is used, "defendants" must be changed to "defendant" wherever it appears.