

Form 1.951 Fall-Down Negligence Complaint

COMPLAINT

Plaintiff, A. B., sues defendant, C. D., and alleges:

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

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2. On(date)....., defendant was the owner and in possession of a building at in Florida, that was used as a (describe use).

3. At that time and place plaintiff went on the property to (state purpose).

4. Defendant negligently maintained (describe item) on the property by (describe negligence or dangerous condition) so that plaintiff fell on the property.

5. The negligent condition was known to defendant or had existed for a sufficient length of time so that defendant should have known of it.

6. As a result plaintiff was injured in and about his/her body and extremities, suffered pain therefrom, incurred medical expense in the treatment of the injuries, and suffered physical handicap, and his/her working ability was impaired; the injuries are either permanent or continuing in nature and plaintiff will suffer the losses and impairment in the future.

WHEREFORE plaintiff demands judgment for damages against defendant.