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SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

CONFIDENTIALS,

Plaintiff,

vs.

CONFIDENTIAL and CONFIDENTIAL ,  
individually and the marital community  
composed thereof,

Defendants.

NO.

COMPLAINT FOR DAMAGES

COMES NOW Plaintiff against the above-named Defendants, and states and alleges as follows:

I. PARTIES & JURISDICTION

1.1 <Plaintiff> is now, and was at all relevant times hereinafter alleged, a resident of Snohomish County, State of Washington.

1.2 <Defendant>is now believed to be, and was at all relevant times hereinafter alleged, a resident of King County, state of Washington. Upon information and belief, this defendant is married to <Defendant>, and his acts and omissions hereinafter described were for and on behalf of his marital community.

1.3 All acts and omissions alleged to have occurred herein took place in King County, State of Washington.

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2 II. FACTS

3 2.1 On or about <Date>, <Plaintiff> and Defendant <Defendant>were operating  
4 their automobiles on Stone Way Avenue North in the city of Seattle, King County, Washington.

5 2.2 Defendant <Defendant>made an unsafe left turn in front of the plaintiff's  
6 vehicle while plaintiff had the right-of-way.

7 2.3 Defendant <Defendant>entered into the plaintiff's lane of travel without  
8 warning.

9 2.4 The plaintiff had no time or opportunity to stop or avoid a collision with the  
10 defendant's vehicle.

11 2.5 The plaintiff's vehicle struck the defendant's vehicle while that vehicle was  
12 executing its left turn.

13 2.6 As a result of the collision, the plaintiff sustained bodily injuries and other  
14 damages.  
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17 III. CAUSE OF ACTION--NEGLIGENCE

18 3.1 Plaintiff re-alleges the allegations contained in paragraphs 1.1 through 2.6,  
19 and incorporate them as though fully set forth herein.

20 3.2 <Defendant>owed the plaintiff a duty of care and a duty to act reasonably.

21 3.3 <Defendant>breached his duty of care and his duty to act reasonably by,  
22 among other things, failing to exercise ordinary care while making a left turn across oncoming  
23 lanes and failing to yield the-right-of way to plaintiff's vehicle.  
24

25 3.4 <Defendant>breached his duty of care and his duty to act reasonably by,  
26 among other things, causing a collision with the plaintiff's vehicle.

3.5 As a result of the defendant's negligent conduct, the plaintiff was injured,  
suffered, and continues to suffer, physical disability and pain, emotional trauma, mental

1 anguish, past and future medical expenses, loss of earnings and earning capacity, loss of  
2 consortium and other damages.

3  
4 WHEREFORE, Plaintiff prays for judgment against the Defendants, jointly and  
5 severally, as follows:

- 6 1. For all damages sustained by Plaintiff in an amount proven at trial, including  
7 past and future medical expenses and other health care expenses, pain and suffering, both  
8 mental and physical, past and future permanent partial disability and disfigurement, loss of  
9 enjoyment of life, damages to property, past and future special damages, loss of consortium  
10 and exemplary damages;  
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12 2. Interest calculated at the maximum amount allowable by law, including pre-  
13 and post-judgment interest;  
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15 3. A reasonable attorney's fee as allowed by law;  
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17 4. Costs and disbursements pursuant to statute; and  
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19 5. Other and further relief as this Court may deem just and equitable.

20 Dated this <Date>.

**DAVIS LAW GROUP, P.S.**

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23 By: Christopher M. Davis  
24 WSBA No. 23234  
25 Attorneys for Plaintiff  
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