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SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

CONFIDENTIAL,

<Plaintiff>,

v.

CONFIDENTIAL AND CONFIDENTIAL,
individually and the marital community
composed thereof ; and 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>, <<Plaintiff>>, is a single person and was, at all relevant times
hereinafter alleged, a resident of King 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. If this defendant is married, her
acts and omissions hereinafter described were for and on behalf of her marital community.

1 1.3 At all times material hereto, defendant <Defendant> was the daughter or
2 family member of defendants <Defendant> and <Defendant>. At all times material hereto, the
3 vehicle operated by defendant <Defendant>was owned, registered and/or maintained by
4 defendants <Defendant> and <Defendant>. Therefore, defendants <Defendant> and
5 <Defendant> are vicariously liable for the negligent acts and/or omissions described herein that
6 were committed by defendant <Defendant>in said operation of vehicle by virtue of the
7 Family Car Doctrine.

9 1.4 All acts and omissions alleged to have occurred herein took place in King
10 County, State of Washington. Venue and jurisdiction are proper in King County Superior
11 Court in Seattle, Washington.
12

13 II. FACTS

14 2.1 On or about <Date>, <Plaintiff> and <Defendant> were operating their
15 automobiles in the city of Seattle, King County, Washington.
16

17 2.2 <Plaintiff> was lawfully operating his vehicle northbound on I-5 at or near the
18 James Street Exit, in Seattle, King County, Washington.

19 2.3 <Defendant> failed to slow her vehicle for traffic ahead.
20

21 2.4 <Defendant> struck the rear of <Plaintiff>'s vehicle causing it to collide into
22 the vehicle ahead.

23 2.5 <Plaintiff> <<Plaintiff>> sustained bodily injury and other damages as a
24 result of the collision.
25

26 III. CAUSE OF ACTION--NEGLIGENCE

1 3.1 <Plaintiff> re-alleges the allegations contained in paragraphs 1.1 through 2.5,
2 and incorporate them as though fully set forth herein.

3 3.2 <Defendant> owed <Plaintiff> a duty of care and a duty to act reasonably.

4 3.3 <Defendant> breached her duty of care and her duty to act reasonably by,
5 among other things, failing to control her vehicle and then colliding her vehicle into
6 <Plaintiff>'s vehicle.

7 3.4 <Defendant> breached her duty of care and her duty to act reasonably by,
8 among other things, failing to exercise ordinary care and causing a collision with
9 <Plaintiff>'s vehicle.

10 3.5 As a result of Defendant's negligent conduct, <Plaintiff> was injured,
11 suffered, and continues to suffer, physical disability and pain, emotional trauma, medical
12 expenses, loss of earnings and earning capacity, and other damages.
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15
16 WHEREFORE, <Plaintiff> prays for judgment against Defendants, jointly and
17 severally, as follows:

18 1. For all damages sustained by <Plaintiff> in an amount proven at trial,
19 including past and future medical expenses and other health care expenses, pain and
20 suffering, both mental and physical, past and future permanent partial disability and
21 disfigurement, loss of enjoyment of life, damages to property, past and future special
22 damages, and other damages;

23
24 2. Interest calculated at the maximum amount allowable by law, including pre-
25 and post-judgment interest;

26 3. A reasonable attorney's fee as allowed by law;

 4. Costs and disbursements pursuant to statute; and

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5. Other and further relief as this Court may deem just and equitable.

Dated this <Date>.

DAVIS LAW GROUP, P.S.

/s/ _____
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By: Gregory Colburn, WSBA No. 41236
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