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SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

CONFIDENTIAL, individually,

Plaintiff,

vs.

CONFIDENTIAL and CONFIDENTIAL,
individually and the marital community
composed thereof; 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 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, his acts and omissions hereinafter described were for and on behalf of his marital community.

1 1.3 Defendants <Defendant>and <Defendant>are now believed to be, and were at
2 all relevant times hereinafter alleged, residents of King County, state of Washington. These
3 defendants are married and therefore constitute a marital community under the laws of the state
4 of Washington.
5

6 1.4 At all times material hereto, <Defendant>was the son or family member of
7 <Defendant>and <Defendant>. At all times material hereto, the vehicle operated by
8 <Defendant>was owned and/or maintained by Defendants <Defendant>and <Defendant>.
9 Therefore, Defendants <Defendant>and John Doe <Defendant>are liable for <Defendant's>
10 negligent acts and/or omissions as described herein by virtue of the Family Car Doctrine.
11

12 1.5 All acts and omissions alleged to have occurred herein took place in King
13 County, state of Washington.
14

15 II. FACTS

16 2.1 On or about <Date>, <Plaintiff> and <Defendant>were operating motor
17 vehicles in the city of Seattle, King County, Washington.
18

19 2.2 Plaintiff was lawfully operating her vehicle on 3rd Avenue North at or near the
20 cross street of Nickerson.
21

22 2.3 <Defendant>failed to yield to plaintiff by pulling out from a parking spot in
23 front of the plaintiff's vehicle without warning.
24

25 2.4 The defendant's vehicle then collided into plaintiff's vehicle.
26

27 2.5 <Plaintiff> sustained bodily injuries and other damages as a result of the
28 collision.

1 III. CAUSE OF ACTION--NEGLIGENCE

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

4 3.2 <Defendant>owed Plaintiff a duty of care and a duty to act reasonably.

5 3.3 <Defendant>breached his duty of care and his duty to act reasonably by,
6 among other things, failing to yield to the plaintiff's vehicle.

7 3.4 <Defendant>breached his duty of care and his duty to act reasonably by,
8 among other things, causing a collision with the plaintiff's vehicle.

9 3.5 As a result of the defendant's negligent conduct, Plaintiff was injured,
10 suffered, and continues to suffer, physical disability and pain, emotional trauma, medical
11 expenses, loss of earnings and earning capacity, loss of consortium and other damages.
12

13
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15 WHEREFORE, Plaintiff prays for judgment against the Defendants, jointly and
16 severally, as follows:

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

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

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

26 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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