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SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

CONFIDENTIAL,  
  
Plaintiff,  
  
vs.  
  
CONFIDENTIAL and CONFIDENTIAL,  
individually and the marital community  
composed thereof; FOOTBALL  
NORTHWEST, LLC, d/b/a SEATTLE  
SEAHAWKS, a Washington Limited Liability  
Company,  
  
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 a resident of King County, State of Washington.

1.2 Defendant <Defendant> is believed to be 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. At all times material hereto, this defendant was acting within the scope of his employment and/or agency with Football Northwest,

1 LLC, and/or Football Northwest Management, Inc., d/b/a Seattle Seahawks of the National  
2 Football League.

3 1.3 Defendant Football Northwest, LLC, is a limited liability company formed  
4 under the laws of the State of Washington. This defendant is believed to transact business  
5 in King County as the Seattle Seahawks professional football team of the National Football  
6 League. At all times material hereto, Defendant Football Northwest, LLC, employed  
7 Defendant James <Defendant> as a football and/or strength conditioning coach, and/or was  
8 this person's principal. Defendant Football Northwest, LLC, is therefore liable for the acts  
9 and/or omissions of its employee and/or agent as described herein under the legal theories  
10 of principal/agent, master/servant and/or respondeat superior.  
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12  
13 1.4 All acts and/or omissions described herein occurred in King County,  
14 Washington. King County is therefore a proper venue for this action.  
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## 16 II. FACTS

17 2.1 On or about <Date>, Defendant <Defendant> was operating a motor vehicle  
18 in Seattle, Washington. The defendant was exiting a parking lot located on or near the  
19 University of Washington campus.  
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21 2.2 At approximately the same time, <Plaintiff> was lawfully operating a bicycle  
22 in a clearly marked travel lane.

23 2.3 The defendant failed to stop his motor vehicle at the clearly marked stop line  
24 and/or otherwise failed to yield to the plaintiff.

25 2.4 The plaintiff had the right of way.  
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