V I R G I N I A:

IN THE CIRCUIT COURT OF

\*

Plaintiff \*

\*

vs. \* Case No.

\*

\*

Defendant \*

COMPLAINT

(Negligence - Auto Collision)

COMES NOW the plaintiff, by counsel, and in support of this Complaint states as follows:

1. The plaintiff resides at the address listed in the caption of this matter.

2. The defendant resides at the address listed in the caption of this matter.

3. On a vehicle operated/occupied by the plaintiff was involved in a motor vehicle collision with a vehicle operated by the defendant at .

4. The collision was proximately caused by the negligence of the defendant.

5. The defendant was negligent in that and for such other reasons as may be adduced during the discovery process or at trial.

6. The collision proximately caused certain property damage to the vehicle owned by the plaintiff.

7. The collision also proximately caused certain injuries and damages to the plaintiff, including but not limited to medical and hospital expenses incurred, loss of use of affected body parts, loss of income, and pain and suffering, some or all of which continue up to the present time and may be continuing or permanent in nature.

WHEREFORE, these premises considered, the plaintiff requests judgment against the defendant in the amount of

$ , plus an award of costs and interest.

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*Counsel for \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_*

**Interrogatories and Request for Documents are served along with this Complaint**