DRAFT - FOR ATTORNEY REVIEW - NOT FOR FILING. Fictional sample of paralegal drafting support. Not legal advice.

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF EXAMPLE

TESSA R. ALDEN, Plaintiff, v. **NEIL P. GROVER; and DOES 1 through 20, inclusive,** Defendants.	**Case No. SAMPLE-CIV-2025-0418** **COMPLAINT FOR PERSONAL INJURY - MOTOR VEHICLE** **DEMAND FOR JURY TRIAL** Unlimited civil case

Plaintiff Tessa R. Alden ("Plaintiff") alleges as follows:

PARTIES

1. Plaintiff is an individual who resides in the City of Anytown, County of Example, State of California.

2. Defendant Neil P. Grover ("Defendant") is an individual who, on information and belief, resides in the City of Anytown, County of Example, State of California.

3. The true names of Does 1 through 20 are unknown. Plaintiff will amend this complaint when those names are ascertained. Plaintiff is informed and believes that each Doe defendant is responsible in some manner for the events alleged.

JURISDICTION AND VENUE

4. This Court has jurisdiction over this unlimited civil action. The amount in controversy exceeds the jurisdictional minimum for unlimited civil cases.

5. Venue is proper in this County because the collision occurred in the County of Example and, on information and belief, Defendant resides in this County.

FACTS

6. On 18 March 2025, at about 4:40 p.m., Plaintiff was driving a 2018 Honda Civic southbound on Harbor Mill Road, in the City of Anytown, County of Example, and was stopped at a red traffic signal at Cedar Quay Avenue.

7. At that time and place, Defendant was driving a 2019 Ford F-150 southbound on Harbor Mill Road, behind Plaintiff's vehicle, and failed to stop for the red signal, so that the front of Defendant's truck struck the rear of Plaintiff's vehicle.

8. As a result of the collision, Plaintiff sustained injuries including, among others, cervical strain, a right shoulder sprain, and a lumbar disc protrusion at L5-S1, and has received medical care for those injuries. Plaintiff has incurred, and may continue to incur, medical expenses and other damages in an amount to be proved.

FIRST CAUSE OF ACTION - Negligence

9. Plaintiff incorporates paragraphs 1 through 8.

10. Defendant owed Plaintiff a duty to operate his vehicle with reasonable care, including a duty to keep a lookout, to control his speed, and to stop for a red traffic signal.

11. Defendant breached that duty when he failed to stop and struck Plaintiff's stopped vehicle, as alleged above.

12. Defendant's negligence was a substantial factor in causing Plaintiff's injuries and damages.

PRAYER FOR RELIEF

Wherefore, Plaintiff prays for judgment against Defendant and Does 1 through 20 as follows:

- Past and future medical expenses, according to proof;
- General damages for pain, suffering, and loss of enjoyment of life, according to proof;
- Costs of suit; and
- Such other relief as the Court considers proper.

DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury on all issues so triable.

Dated: 8 September 2026

ELLIS & ROWAN LLP

Jordan P. Ellis, Esq.
Attorneys for Plaintiff Tessa R. Alden (fictional sample; not for filing)

End of fictional sample. A delivered complaint draft is prepared for the client's attorney to review, revise, and sign. SummaryDesk does not file or sign pleadings.