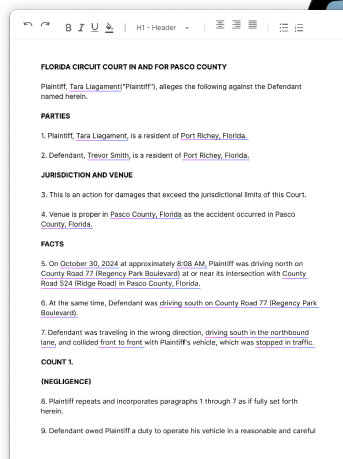


Sample Complaint for Attorneys

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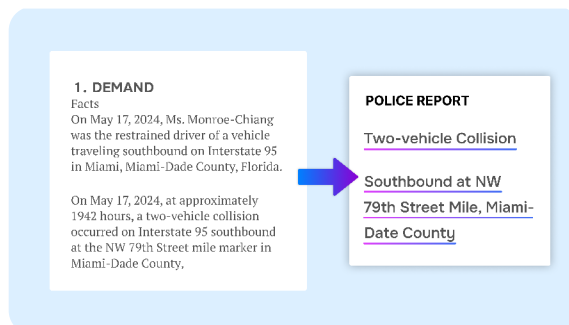
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\$385M

Capital Raised

\$2B

Company valuation

2,000+

Law firms using EvenUp

1,600+

Demands and
MedChron's weekly

\$10B+

Damages claimed

\$436M

Resolved from missing
documents



[COURT NAME IN ALL CAPS]

Ryan Calder,

Plaintiff,

v.

Tyler Brennan,

Defendant.

CIVIL ACTION NO.

COMPLAINT
JURY TRIAL DEMANDED

**1. IN THE CIRCUIT COURT OF THE 11TH JUDICIAL CIRCUIT IN AND FOR
MIAMI-DADE COUNTY, FLORIDA**

Plaintiff, Ryan Calder ("Plaintiff"), alleges the following against the Defendant named herein:

1. This is an action arising out of the acts and omissions of Defendant Tyler Brennan, which occurred on or about September 15, 2024, and which resulted in the incident referred to herein as the "Collision."

2. PARTIES

3. Plaintiff is a resident of Miami, Miami-Dade, Florida.

4. Defendant Tyler Brennan is a resident of Miami Beach, Miami-Dade, Florida.

5. JURISDICTION AND VENUE

6. This Court has jurisdiction over the parties and the subject matter of this action.

7. Venue is proper because the most substantial act or omission giving rise to this action occurred in Miami-Dade, Florida.

8. Plaintiff is seeking damages that meet or exceed the monetary threshold for relief from this Court.

9. FACTS

10. On September 15, 2024, at approximately 18:43 (6:43 PM), in Miami, Plaintiff was traveling eastbound on SW 8th Street approaching the intersection with SW 22nd Avenue.

11. At the same time, Defendant was traveling eastbound on SW 8th Street when Defendant failed to maintain proper following distance and struck Plaintiff's vehicle in the rear when Plaintiff had to stop for pedestrians crossing against the signal after the light turned green, causing a collision with Plaintiff's vehicle.

12. As a result of Defendant's acts and/or omissions on September 15, 2024, Plaintiff sustained property damage and incurred economic losses.

13. COUNT 1
(NEGLIGENCE)

14. The preceding paragraphs are incorporated herein by reference.

15. Defendant owed a duty to operate the motor vehicle safely and in accordance with applicable laws, as any reasonably prudent person would under similar circumstances.

16. Defendant breached this duty by carelessly causing the collision with Plaintiff's vehicle.

17. As a direct and proximate result of Defendant's actions, Plaintiff incurred property damage and economic losses.

18. Plaintiff is entitled to judgment against Defendant for damages, including property damage and economic losses, plus any applicable costs, interest, and attorney fees as determined by a jury.

19. COUNT 2
(NEGLIGENCE PER SE)

20. The preceding paragraphs are incorporated herein by reference.

21. Defendant's acts and omissions in causing the Collision were in violation of Florida law establishing the standard of care, including, but not limited to:

- a. Following too closely (Florida Traffic Laws § Following Too Closely)
- b. Driving under the influence (Florida Traffic Laws § Driving Under the Influence)
- c. Failure to maintain proper following distance (Florida Traffic Laws § Following Distance)

22. The economic losses and property damage sustained by Plaintiff were a foreseeable consequence of the violation of the above statutory provisions.

23. Plaintiff is within the class of persons that these statutory provisions were designed to protect, and the harm suffered was of the type the provisions intended to prevent.

24. Given the circumstances and the Defendant's violation of these statutes, Defendant is held responsible under negligence per se for the collision.

25. As a direct and proximate result of Defendant's actions, Plaintiff incurred property damage and economic losses.

26. Plaintiff is entitled to judgment against Defendant for damages, including property damage and economic losses, plus any applicable costs, interest, and attorney fees as determined by a jury.

1.1. PRAYER FOR RELIEF

WHEREFORE, Plaintiff demands a trial by jury and judgment against Defendant as follows:

- a. Economic damages, including but not limited to:
 - i. Property damage and related out-of-pocket expenses;
- b. Interest as permitted by law;
- c. Costs of this action; and
- d. Any other relief that this Court deems proper.

Respectfully submitted this [X] day of [month], [year]

[Signature Block]