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STATE OF SOUTH CAROLINA	IN THE COURT OF COMMON PLEAS
Plaintiff, vs.	SUMMONS (Wreck Case-Negligence)
and LLC	JURY TRIAL
Defendants. 	required to answer the complaint herein, a copy of
	a copy of your answer to the said complaint on the
subscriber, Sector at Post Office Box Sector . You must serve your answer to	the said complaint on the subscriber within thirty
days after the service hereof, exclusive of the day	of such service. If you fail to answer the
complaint within <u>THIRTY DAYS</u> , the plaintiff w	vill apply to the court for ajudgment by default
against you for the relief demanded in the compla	aint.
	Respectfully submitted, By: <u>s/</u> Plaintiff/Attorney for Plaintiff

Attorney for the Plaintiff Post Office Box



South Carolina (Office) (Facsimile) .com South Carolina Bar Number: Dated:

STATE OF S	OUTH CAROLINA			
COUNTY OF		IN THE COURT OF COMMON PLEAS		
VS.	Plaintiff,	SUMMONS (Wreck Case-Negligence)		
		JURY TRIAL		
	,			
	Defendants.			
The Plaintiff hereby makes the following complaint against Defendants:				
	PART	TES		
1.	Plaintiff (") is a citizen and resident of		
and at the time of the accident was the driver and owner of sectors , having				
2. citizen and re	Defendant (" sident of sident , sident) is, upon information and belief, a , and at the time of the occurrence herein		
mentioned was the driver of a second second , having				
3.	Defendant LLC ('	") is company, primarily		
operating as rent -a- car service business, having its registered office at				
, and is the owner of the provide the providet the provide the provide the provide the providet the pro				
is the employer of				
4.	The underlying accident that is the s	subject matter of this lawsuit occurred in		
	County, South Carolina.			
5.	Both Plaintiff and Defendants are jo	intly referred to as "Parties."		

JURISDICTION AND VENUE

6. Plaintiff reaffirms and reiterates all allegations above as if fully repeated and are incorporated herein verbatim.

7. This Court has jurisdiction over the parties and the subject matter herein set forth.

8. Venue is proper under South Carolina Code § 15-7-20, as Steven's acts or omissions

giving rise to the causes of action occurred in County, South Carolina.

GENERAL ALLEGATIONS

1. Plaintiff reaffirms and reiterates all allegations above as if fully repeated and are incorporated herein verbatim.

On ______, at around ______ hours, ______ was involved in a motor vehicle accident while lawfully operating his vehicle.
 On the day of the incident, ______ was a restrained driver who was travelling ______ was driving the vehicle on the same direction,

on _____. While _____ was exiting Interstate ______ on _____

to driver's side.

4. At the time of the accident, the estimated speed of the vehicles driven by

as well as were miles per hour.
5. was determined to be the at-fault driver from the motor vehicle

accident.

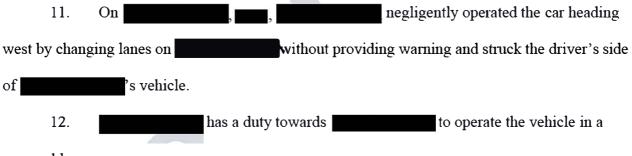
6. As a result of the motor vehicle accident, sustained acute, severe, and significant injuries to her from The injuries were casually related to the motor vehicle accident. Suffered real and personal property damage more particularly set forth later in the Complaint herein.



7. The Acci	dent Report shows that	is the contributin	ng party to the
accident and not	. Aggrieved by dama	ges caused by	's negligent
driving,	files this complaint.		
8. At the tin	ne of the accident,	was working for	and is
an employee of			
9.	operated the	(the "car") owned by	
during his employment	on the day	of the accident on	

(Negligence as against Defendant

10. Plaintiff reaffirms and reiterates all allegations above as if fully repeated and are incorporated herein verbatim.



reasonable manner.

13. individually, and jointly, and in combination, at the time and place above-mentioned, breached a duty to and was negligent, grossly negligent, wanton, willful, and careless in one or more of the following:

- a. Operating a motor vehicle, a dangerous instrumentality, or allowing a motor vehicle to be operated that was in a dangerous and/or unsafe condition;
- b. Operating a motor vehicle, a dangerous instrumentality, or allowing a motor vehicle to be operated by one who was incapable of safely doing so;
- c. Failing to keep the automobile under proper control;



- d. Driving too fast for conditions;
- e. Failing to apply or timely apply his brakes;
- f. Failing to yield to right-of-way;
- g. Failing to properly warn while changing lane;
- h. Failing to use the degree of care and caution that a reasonable and prudent person would have used under the circumstances then and there prevailing, all of which was the direct and proximate cause of the damages and injuries suffered by

herein, said acts being in violation of the statutory and common laws of the State of South Carolina.

14. As a result of the collision, suffered great physical harm and injury from all of which has and will in the future cause **sector of the sector of the se**

15. By reason of ______''s negligent acts and recklessness as set forth above, ______'is entitled to an award of actual, consequential, and punitive damages in an

appropriate amount and for the costs of this action.

SECOND CAUSE OF ACTION (Vicarious Liability as against Defendant

Plaintiff reaffirms and reiterates all allegations above as if fully repeated and are incorporated herein verbatim.

17. If is the rent-a-car service company for which worked and is the owner of the car driven by the on the server, the day of the accident.

18. Is used the car as an employee of the business purposes of the second sec

20. During the collision, was in the course of his employment and was acting as an agent of **and**.

21. It is vicariously liable for damages caused by the car under its ownership while it was used by **Equation**, as its employee.

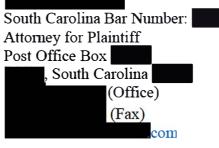
22. By reason of **actual**'s negligent acts and **actual**'s liability as set forth above, **actual** is entitled to an award of actual, consequential, and punitive damages in an appropriate amount and for the costs of this action.

WHEREFORE, Plaintiff prays for judgment against the Defendants and and propriate amount, for the costs of this action, and for such other and further relief as this Court might deem just and proper.

Respectfully submitted,

Dated: Wednesday,





County, South Carolina