

Pro Se Litigant

By: JOHN DOE  
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JOHN DOE  
1234 MULBERRY ST.  
BLACKACRE, PA 12345

vs.

SARAH SMITH  
5678 PINE ST.  
WHITEACRE, PA 56789

DELAWARE COUNTY  
COURT OF COMMON PLEAS  
CIVIL DIVISION

No.

JURY TRIAL DEMANDED

Commented [LF1]: Insert your contact information

Commented [LF3]: Insert the county that has jurisdiction over your case.

Commented [LF2]: Insert defendant's name and current home address

Commented [LF4]: If your case is an arbitration matter, substitute this for "THIS IS AN ARBITRATION MATTER"

**NOTICE TO DEFEND**

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by attorney and filing in writing with the Court your Defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claimed in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you. **YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET HELP.**

**AVISO**

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objecciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demand. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted. **LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO. VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.**

Delaware County Bar Association  
335 W. Front Street, P.O. Box 466  
Media, PA 19063  
610-566-6625

Commented [LF5]: Insert the Bar Association, location, and contact information for the county in which you are filing suit.

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Commented [LF6]: Insert your contact information

JOHN DOE  
1234 MULBERRY ST.  
BLACKACRE, PA 12345

DELAWARE COUNTY

Commented [LF8]: Insert the county that has jurisdiction over your case.

COURT OF COMMON PLEAS

vs.

CIVIL DIVISION

SARAH SMITH  
5678 PINE ST.  
WHITEACRE, PA 56789

No.

JURY TRIAL DEMANDED

Commented [LF7]: Insert defendant's name and current home address

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COMPLAINT – MVA

1. Plaintiff John Doe is an adult individual and a citizen of the Commonwealth of Pennsylvania and at all times resides at 1234 Mulberry St., Blackacre, PA 12345.

2. Defendant Sarah Smith is an adult individual and a citizen of the Commonwealth of Pennsylvania and at all times resides at 5678 Pine St., Whiteacre, PA 56789.

3. At all times relevant hereto, defendant Sarah Smith owned, operated and controlled the vehicle involved in the incident on May 5, 2015.

4. On or about May 5, 2015, at approximately 7:50 A.M., plaintiff John Doe was the lawful operator of a motor vehicle travelling westbound on MacDade Boulevard in Folsom, PA when defendant Sarah Smith, who was travelling eastbound on MacDade Blvd., impacted with plaintiff John Doe's vehicle while defendant Sarah Smith attempted to make a left-hand turn on Kedron Avenue when plaintiff John Doe had the right-of-way.

Commented [LF10]: Insert facts of the accident

5. The aforesaid accident was due solely to the negligence and carelessness of defendant acting as aforesaid and was due in no manner whatsoever to any act or failure to act on the part of plaintiff John Doe.

COUNT I  
JOHN DOE V. SARAH SMITH

6. Plaintiff incorporates by reference paragraphs 1 through 5 of plaintiff's complaint as if fully set forth herein at length.

7. The accident was caused solely by the carelessness and negligence of defendant Sarah Smith, acting as aforesaid and consisted inter alia of the following:

- (a) Failing to yield to vehicles with the right-of-way, such as plaintiff John Doe;
- (b) Failing to have her vehicle under proper and adequate control so as to avoid a collision with plaintiff John Doe's vehicle;
- (c) Failing to keep a proper lookout;
- (d) Failing to avoid an accident;
- (e) Failing to make timely application of the brakes;
- (f) Failing to observe what was plainly in front of her;
- (g) Failing to use due caution in driving said vehicle on the roadway;
- (h) Failing to warn plaintiff John Doe; and
- (i) Failing to take due note of the point and position of plaintiff John Doe's motor vehicle on the roadway.

8. Solely as a result of the negligence and carelessness of defendant Sarah Smith, plaintiff John Doe has suffered injuries which are serious or permanent in nature, including but not limited to post-traumatic cervical, thoracic and lumbar spine sprain and strain; post-traumatic trapezius myofasciitis; post-traumatic cervical and lumbar radiculitis; post-traumatic right lateral epicondylitis; and post-traumatic right rotator cuff tendinopathy, all of which have in the past and may in the future cause plaintiff John Doe great pain and suffering and further has caused and will cause in the future a serious impairment of bodily function.

9. As a further result of the negligence and carelessness of defendant Sarah Smith, Plaintiff John Doe has been or will be required to receive and undergo medical attention and care

**Commented [LF11]:** Insert what the defendant should have done but failed to do.

**Commented [LF12]:** Insert all the injuries you sustained as a result of the defendant's negligence

and to expend various sums of money and to incur various expenses and she may be required to continue to expend such sums or incur such expenditures for an indefinite time in the future.

10. As a result of the carelessness and negligence of defendant Sarah Smith, plaintiff John Doe has a medically determinable physical impairment which prevents plaintiff John Doe from adequately performing all or substantially all of the material acts and duties which constituted plaintiff John Doe's usual and customary activities prior to the accident.

11. As a further result of the negligence and carelessness of defendant Sarah Smith, plaintiff John Doe has or may hereinafter incur other financial expenses which do or may exceed amounts which Plaintiff John Doe may otherwise be entitled to recover including payment for medical bills.

12. As a direct result of the negligence and carelessness of defendant Sarah Smith, plaintiff John Doe has or may hereinafter suffer severe physical pain, mental anguish, humiliation and embarrassment and she may continue to suffer same for an indefinite time in the future.

13. As a direct result of the negligence and carelessness of defendant Sarah Smith, plaintiff John Doe has and may suffer a severe loss of earnings and/or impairment of her earning capacity and power, which such loss of income and/or impairment of her earning capacity has or may exceed the sum recoverable under the limitations of the Pennsylvania Financial Responsibility Act.

**WHEREFORE**, plaintiff John Doe demands judgment against defendant Sarah Smith in an amount in excess of \$50,000 together with all costs, expenses, attorney's fees and other amounts deemed appropriate by this Honorable Court.

BY: \_\_\_\_\_  
JOHN DOE  
Pro Se Litigant

**Commented [LF13]:** This paragraph is not necessary if you are not claiming work loss.

**Commented [LF14]:** If your case is an arbitration matter, then it should say "in an amount NOT in excess of \$50,000...". (emphasis added for demonstrative purposes.

**VERIFICATION**

I, **JOHN DOE**, hereby verify that I am the **PLAINTIFF** in this cause of action and verify that the statements made in the foregoing **COMPLAINT IN CIVIL ACTION** are true and correct to the best of my **knowledge, information and belief**. I understand that the statements therein are made subject to the penalties of 18 PA. C.S.A. § 4904 relating to unsworn falsification to authorities.

\_\_\_\_\_

**JOHN DOE**

**DATE:** \_\_\_\_\_