COUNTY OF SUFFOLK	E STATE OF NEW YORK	
	X & XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	Index No:
	~	SUMMONS
	Plaintiff(s),	
		Plaintiff designates SUFFOLK
-against-		County as the place of trial
-		The basis of venue is:
XXXXXXXXXXX,		Plaintiff's Residence
		Plaintiffs reside at
	Defendant(s).	XXXXXXX XXXXXXXX Avenue,
	X	XXXXXXXXX, New York, XXXXX

TO THE ABOVE NAMED DEFENDANT(S):

YOU ARE HEREBY SUMMONED to answer the Complaint in this action and to serve a copy of your Answer, or, if the Complaint is not served with this Summons, to serve a Notice of Appearance, on the Plaintiff's Attorneys within 20 days after the services of this Summons, exclusive of the day of service (or within 30 days after the service is complete if this Summons is not personally delivered to you in the State of New York). In case of your failure to answer, judgment will be taken against you by default for the relief demanded in the Complaint.

The basis for the venue designated is plaintiff's residence within the County of Suffolk, State of New York.

Dated: XXXXXXXXXX, New York XXXXXXXX X, 2008

THE LAW OFFICE OF JEENA R. BELIL, P.C.

Defendant's address: XXXXXXXXXXXX, XXXXXXX, XXXXXXX XXXXX

Notice: The nature of this action is a motor vehicle accident

SUPREME COURT OF COUNTY OF SUFFOL	F THE STATE OF NEW YORK .K	
XXXXXXXXXXXXX	Index No:	
	Plaintiff(s),	VERIFIED COMPLAINT
-against-		
xxxxxxxxxxx	XXX,	
	Defendant(s).	

AS AND FOR A FIRST CAUSE OF ACTION

- 1. At all times mentioned herein, Plaintiff XXXXXXXXX was and still is a resident of the County of Suffolk, State of New York.
- 2. At all times mentioned herein, Plaintiff XXXXXXXXX was and still is a resident of the County of Suffolk, State of New York.
- 3. At all times mentioned herein, Defendant XXXXXXXXX was and still is a resident of the County of Suffolk, State of New York.
- 4. At all times mentioned herein, DEFENDANT was the owner and operator of a certain motor vehicle bearing New York State license plate number XXXXXXX.
- 5. At all times mentioned herein, the Plaintiff, XXXXXXXXXX, was the owner and operator of a certain motorcycle bearing New York State motorcycle license plate XXXXXX
- 6. At all times mentioned herein, XXXXXXXX at or near its intersection with XXXXXXXXX Drive, in the County of Suffolk, State of New York, was and still is a public thoroughfare.
- 7. That on or about the XXst day of XXXXXXXX, 2008, the motor vehicle owned and operated by the defendant, XXXXXXXXXX, bearing license plate number XXXXXXXXX, New York, 2009, came into contact with the motorcycle owned and operated by Plaintiff, XXXXXXXXXX, bearing plate number XXXX, New York, 2003.
 - 8. That the aforesaid occurrence was due to the negligence of the Defendant.
- 9. That the Defendant XXXXXXXXXX, was negligent in the ownership, maintenance and control of her motor vehicle thereby causing serious and permanent injuries to the plaintiff, XXXXXXXXXX.

- 10. That the injuries of the plaintiff, XXXXXXXXX, were caused wholly and solely through the negligence of the defendant without any fault on his part contributing thereto.
- 11. That by reason thereof, the plaintiff, XXXXXXXXX, sustained painful, permanent and disabling personal injuries requiring him to seek and obtain medical care and treatment and disabling him from his normal and usual daily activities.
- 12. That as a result thereof, plaintiff XXXXXXXXXX, was caused to sustain "serious personal injuries" as defined in Section 5102(d) of the Insurance Law of the State of New York.
- 13. That as a result thereof, plaintiff XXXXXXXXXX, has been damaged in the sum of TWO MILLION (\$2,000,000) DOLLARS.

AS AND FOR A SECOND CAUSE OF ACTION

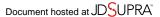
- 14. That at all times hereinafter mentioned, Plaintiff XXXXXXXXX, repeats, reiterates and realleges each and every allegation contained set forth above in this complaint, with the same force and effect as though more fully set forth at length herein.
- 15. That at all times hereinafter mentioned, Plaintiff XXXXXXXXX, was the lawful spouse of the Plaintiff, XXXXXXXXXX, and as such, said Plaintiff, XXXXXXXXX, was entitled to the society, services and consortium of the said Plaintiff XXXXXXXXXX.
- 16. By reason of the aforementioned negligence of the Defendant, the Plaintiff XXXXXXXXX was deprived of the society, services and consortium of the Plaintiff XXXXXXXXXX, and shall forever be deprived of said society, services and consortium.
- 17. Additionally, by reason of the aforementioned negligence of the Defendant, the Plaintiff XXXXXXXXX has been deprived of certain public retirement benefits which would have been available to her had it not been for the negligence of the Defendant.
- 18. That by reason of the foregoing negligence on the part of the Defendant, the Plaintiff XXXXXXXXXX has been damaged in the amount of FIVE HUNDRED THOUSAND (\$ 500,000) DOLLARS.

WHEREFORE, Plaintiff XXXXXXXXXX demands judgment against Defendant in the sum of TWO MILLION (\$2,000,000) DOLLARS on the first cause of action; Plaintiff XXXXXXXXXX, demands judgment against the Defendant in the sum of FIVE HUNDRED THOUSAND (\$500,000) DOLLARS on the second cause of action together with interest, costs and disbursements of these actions

Dated: XXXXXXX, New York XXXXXXXX X, 2008

Yours, etc.,

Jeena R. Belil, Esq. The Law Office of Jeena R. Belil, P.C. Attorney for Plaintiffs



http://www.jdsupra.com/post/documentViewer.aspx?fid=536455d1-ea9f-4fda-a8ac-2923405d48f0

VERIFICATION

STATE OF NEW YORK) ss:	
COUNTY OF SUFFOLK)	
XXXXXXXXXX and XXXX	XXXXXX being duly sworn, deposes and say	ys under penalties of perjury:
foregoing complaint and that the	action and as such, we are fully familiar value allegations contained therein are true to make a segon on information and belief and as to those	y own knowledge, except as to
	XXXXXXXXX	
	XXXXXXXXX	
Sworn to before me this day of		
Notary Public		