

IN THE CIRCUIT COURT FOR RUTHERFORD COUNTY, TENNESSEE

JOYCE STEVENS and )  
JOHN STEVENS, )  
 )  
Plaintiffs, )  
 )  
vs. ) No. \_\_\_\_\_  
 )  
JOHN DOE, )  
 )  
Defendant. )

COMPLAINT

Joyce and John Stevens, for their cause of action against the defendant, state to the Court as follows:

1. Joyce and John Stevens, a married couple, are citizens and residents of Rutherford County, Tennessee.
2. John Doe is the unknown operator of a motor vehicle that caused a wreck with Joyce Stevens in Rutherford County, Tennessee, on October 6, 2002.
3. On October 6, 2002, Ms. Stevens was driving her 1995 Toyota Camry north on Highway 21 in Rutherford County, Tennessee.
4. At that time, the vehicle driven by John Doe entered into the northbound lane of Highway 21 and struck the vehicle driven by Ms. Stevens. After the collision, Ms. Stevens's vehicle made contact with another vehicle and turned over.
5. John Doe acted negligently by, *inter alia*, failing to yield the right-of-way to the Stevens vehicle; failing to ensure that he could safely enter onto the northbound lane on Highway 21; failing to exercise due care when operating his vehicle; and failing to avoid the wreck.
6. The negligence of John Doe was a proximate cause of all the injuries and damages sustained by the plaintiffs.
7. As a result of John Doe's negligence, Ms. Stevens has sustained and will continue to sustain personal injuries, pain and suffering, medical expenses, lost capacity to enjoy life, disfigurement, and loss of earning capacity. Ms. Stevens also sues the defendant for the property damage to her vehicle as a result of the wreck.
8. As a result of John Doe's negligence, John Stevens, individually, seeks damages for property damage to the Stevens vehicle, as well as the loss of the society, affection, companionship, and consortium of his wife.

9. The plaintiffs have satisfied the requirements of Tenn. Code Ann. § 56-7-1201(e).

WHEREFORE, the plaintiffs respectfully request:

1. A jury to try this cause;
2. An award of compensatory damages for Joyce Stevens, individually, in a fair and reasonable amount to be determined by the jury;
3. An award of compensatory damages for John Stevens, individually, in a fair and reasonable amount to be determined by the jury;
4. Court costs and discretionary costs;
5. Pre-judgment interest; and
6. Such further relief as the Court may deem proper.

Respectfully submitted,

---

John D. Wood, No. 16957  
BRANHAM & DAY, P.C.  
5300 Maryland Way, Suite 300  
Brentwood, TN 37027  
(615) 742-4880

Attorneys for Joyce and John Stevens

We are surety for costs  
not to exceed \$1,000.00

BRANHAM & DAY, P.C.

---

John D. Wood