

MARY S. JONES
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Attorney for Plaintiff

JOHN SCOTT
Plaintiff,

v.

THE MARKET TRANSITION FACILITY
Defendant,

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: ESSEX COUNTY
DOCKET NO.

Plaintiff John Scott, now residing at _____, _____ County, New Jersey, by way of Complaint against the defendant, says:

1. At all times herein relevant, the defendant Market Transition Facility was an entity authorized by the State of New Jersey to write policies of automobile insurance.
2. On or about _____, 20__, while driving his father's private passenger automobile, plaintiff John Scott was involved in an automobile accident in which he sustained personal injuries.
3. Prior to the date of the accident, defendant Market Transition Facility had issued a policy of automobile insurance to John Scott's father, Kenneth Scott, with whom he resided, under policy number XX12345678, issued by the Market Transition Facility's servicing carrier, ABC Insurance Services.
4. At the time of the accident, plaintiff John Scott did not own his own vehicle, and therefore was qualified to receive benefits under his father's policy, both as a resident relative and as a permissive user of his vehicle.
5. Following his accident, the plaintiff John Scott applied for personal injury protection benefits to the defendant by submitting a timely application for personal injury protection benefits and a notarized affidavit of no insurance as well as copies of the medical bills incurred for treatment of injuries sustained in the accident.
6. The defendant Market Transition Facility, by its servicing carrier, ABC Insurance Services, has wrongfully failed and refused to make prompt payment of plaintiff's medical bills, in violation of New Jersey No Fault Law and in breach of the defendant's policy of insurance with the plaintiff's father.
7. As a result of the actions of the defendant as herein set forth, the plaintiff has suffered damages.

WHEREFORE, the plaintiff John Scott demands judgment against the defendant for damages including payment of all medical bills, statutory penalties including interest and counsel fees, and such other relief as this Court may deem fair and proper.

CERTIFICATION

I hereby certify that the matter in controversy is not the subject of any other action pending in any Court, nor of a pending arbitration proceeding. I further certify that no other action or arbitration proceeding is presently contemplated. There was a third-party action filed in Essex County against the tortfeasor under docket number L-12345-92, which has been settled and dismissed.

DATED:

Attorney for Plaintiff