**Defence In Suits For Injuries Caused By Negligent Driving**

In the Court of ......................................  
  
A.B. (add description and residence) ...................... Plaintiff

against

C.D. (add description and residence) .................... Defendant

 Respectfully

1. The defendant denies that the carriage mentioned in the plaint was the defendant's carriage, and that it was under the charge or control of the defendant's servants. The carriage belonged to... .of..........Street, Calcutta, livery stable keepers employed by the defendant to supply him with carriages and horses; and the person under whose charge and control the said carriage was, was the servant of the said.

2. The defendant does not admit that the said carriage was turned out of Middleton Street either negligently, suddenly or without warning, or at a rapid or dangerous pace.

3. The defendant says the plaintiff might and could, by the exercise of reasonable care and diligence, have seen the said carriage approaching him, and avoided any collision with it.

4. The defendant does not admit the statements contained in the third paragraph of the plaint.

 Dated :

                                                                           Plaintiff / Defendant

                                                                          Through, Advocate

 Verification:

            I, \_\_\_\_\_\_, do hereby verify that the contents from paras 1 to \_\_\_\_\_\_ are correct and true to the best of my knowledge and personal belief and no part of it is false and nothing material has been concealed therein.

           Affirmed at Shimla this \_\_\_\_\_\_.

                                                            Plaintiff / Defendant