**Injuries Caused By Negligent Driving**

In the Court of ......................................

A.B. (add description and residence) ...................... Plaintiff

against

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

A. B., the above-named plaintiff, states as follows:-

1.         The plaintiff is a shoemaker, carrying on business at...... . The defendant is a merchant of.................

2.         On the...... day of...... 19... , the plaintiff was walking south ward along Chowringhee, in the City of Calcutta, at about 3 o'clock in the afternoon. He was obliged to cross Middleton Street, which is a street running into Chowringhee at right angles. While he was crossing this street, and just before he could reach the foot pavement on the further side thereof, a carriage of the defendant's, drawn by two horses under the charge and control of the defendant's servants, was negligently, suddenly and without any warning turned at a rapid and dangerous pace out of Middleton Street into Chowringhee. The pole of the carriage struck the plaintiff and knocked him down, and he was much trampled by the horses.

3.         By the blow and fall and trampling the plaintiff's left arm was broken and he was bruised and injured on the side and back, as well as internally, and in consequence thereof the plaintiff was for four months ill and in suffering and unable to attend to his business, and incurred heavy medical and other expenses, and sustained great loss of business and profits.

[i. Facts showing when the cause of action arose and that the Court has jurisdiction. ]  
  
ii. The value of the subject-matter of the suit for the purpose of jurisdiction is ................rupees and for the purpose of court-fees is ................rupees., and Relief claimed.]

Dated :

                                                                           Plaintiff

                                                                          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