**SUIT FOR DAMAGES FOR INJURIES CAUSED BY NEGLIGENT DRIVING**

IN THE COURT OF THE....................

Suit No..................... of 19....................

C. D.................................................................... Plaintiff

*versus*

C. F................................................................. Defendant

The abovenamed plaintiff most respectfully submits as under: —

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 southward along....................,. in the City of..................... at about 3 o’clock in the afternoon. He was obliged to cross.................... which is a street running into .................... at right angles. While he was crossing this street, and just before he could reach the foot pavement on the farther 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.................... into.................... The pole of the carriage struck the plaintiff and knocked him down, and he was 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 is suffering and unable to attend to his business, and incurred heavy medical and other expenses, and sustained great loss of business and profits, which are assessed to be of Rs. .................... as detailed in the Schedule annexed hereto.

4. The plaintiff demanded damages through registered notice but the defendant has denied his liability in his reply.

5. The cause of action arose on.................... 19.................... when the plaintiff got injuries at the hands of the defendant’s wrongful driving of the horse carriage, within the jurisdiction of this court.

6. The suit is valued at Rs..................... the amount of damages claimed.

RELIEF CLAIMED:

The plaintiff claims Rs.................... from the defendant by way of damages and costs of the suit.

Plaintiff

Through Advocate

**VERIFICATION**

I, abovenamed plaintiff, do hereby verify that the contents of paras .................... to.................... of the plaint are true to my personal knowledge and those of paras.................... and.................... thereof are based on legal advice which I believe to be true.

Verified on this................. day of.................... 19.................... at....................

Plaintiff