**Carrying on Noxious Manufacture**

**(Title)**

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

The plaintiff is, and at all the times hereinafter mentioned was, possessed of certain lands called............, situate in.........................

Ever since the........... day of.......... 19..........., the defendant has wrongfully caused to issue from certain smelting works carried on by the defendant large qualities of offensive and unwholesome smoke and other vapors and noxious matter, which spread themselves over and upon the said lands, and corrupted the air, and settled on the surface of the lands.

Thereby the trees, hedges, herbage and crops of the plaintiff growing on the lands were damaged and deteriorated in value, and the cattle and live-stock of the plaintiff on the lands became unhealthy, and, many of them were poisoned and died.

The plaintiff was unable to graze the lands with cattle and sheep as he otherwise might have done, and was obliged to remove his cattle sheep and farming-stock there from, and has been prevented from having so beneficial and healthy a use and occupation of the lands as he otherwise would have had.

[As in paras.4 and 5 of Form No.1, and Relief claimed.]