**Injuries Caused in Negligent Driving**

**(Title)**

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 southward along chowringhee, in the city of Calcutta, at about 3 O' Clock in the afternoon. He was obliged to cross Middleman Street, which is a street running in to Chowringhee at right angles. While he was crossing this street, and just before he could reach the foot-payment 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 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 lift 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.

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