**Carrying on a Noxious Manufacture**

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

KK…………………………….. resi………………………….. ...................... Plaintiff

against

GM……………….. ……….. resi……………………………… .................... Defendant

KK., the above-named plaintiff, states as follows:-

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

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

3. 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.

4. 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 therefore, and has been prevented from having so beneficial and healthy a use and occupation of the lands as he otherwise would have had.

[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 KALYAN this \_\_\_\_\_\_.

Plaintiff