

SAMPLE CIVIL FORM 16.

IN THE _____ COURT OF _____ COUNTY

A.B., Plaintiff)
v.)
C.D., Defendant)

CIVIL ACTION NO. _____

COMPLAINT FOR NEGLIGENCE OR WANTONNESS

1. On or about the _____ day of _____, upon a public highway [state the name of the street] in [City], _____ County, Alabama, the defendant negligently [or wantonly] caused or allowed a motor vehicle to collide with a motor vehicle occupied by the plaintiff.

2. As a proximate consequence of the defendant's said negligence [or wantonness], the plaintiff was caused to suffer the following injuries and damages:

[enumerate injuries and damages].

Wherefore plaintiff demands judgment against defendant in the sum of _____ dollars and costs.

[Signed]: _____

Attorney for Plaintiff

Address:

Committee Comments

Since contributory negligence is an affirmative defense, the complaint need contain no allegation of due care of plaintiff.