

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.