

ALVIN SLAY, JR.,	℥	
Plaintiff,	℥	IN THE CIRCUIT COURT OF
vs.	℥	BALDWIN COUNTY, ALABAMA
LOUISVILLE & NASHVILLE RAILROAD	℥	AT LAW
COMPANY, a corporation, and		
JOHN DOE, RICHARD DOE, JOHN ROE	℥	
and RICHARD ROE, whose names are		
to your plaintiff otherwise un-	℥	
known, as members of an L & N		
train crew,	℥	
Defendants.	℥	

NO. 6450

DEMURRER

Comes the Defendant, Louisville & Nashville Railroad Company, a corporation, and demurs to the Complaint filed in the above styled cause and to each and every count thereof, separately and severally, and assigns the following separate and several grounds, viz:

1. That said Complaint fails to state a cause of action.
2. That said Complaint is vague and indefinite.
3. That said Complaint fails to sufficiently describe the lands of the Plaintiff which were damaged.
4. That said Complaint fails to allege that the Defendant's negligence was the proximate cause of the Plaintiff's injury.
5. That said Complaint fails to allege any duty owing by the Defendant, Louisville & Nashville Railroad Company, to the Plaintiff.
6. That Count 2 of the Complaint fails to allege which Defendant negligently allowed dry grass to accumulate on its right-of-way.
7. That said Complaint fails to allege which Defendant owned the railroad right-of-way.

8. That said Complaint fails to allege what train owned by one of the Defendants caused the damage.

9. That the claim for injuries is not set out with sufficient certainty to apprise the Louisville & Nashville Railroad Company of what it is called upon to defend.

10. That Count 3 of the Complaint fails to allege which Defendant is the principal and which Defendants are its agents.

11. That Count 3 of the Complaint is not sufficiently definite as to the time of day or night that the alleged negligence is supposed to have occurred.

12. That said Complaint attempts to set out the quo modo of the negligence without setting out sufficient facts to establish negligence as a matter of law under the laws of the State of Alabama.

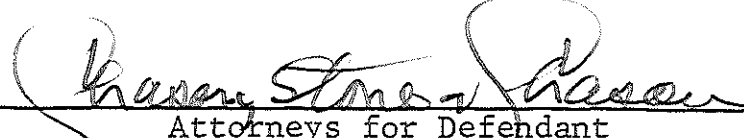
13. That Count 4 of the Complaint does not allege whose willful and wanton acts resulted in damage to the Plaintiff.

14. That Counts 4 and 5 of the Complaint fail to allege that the Defendants willfully injured the Plaintiff.

15. That Counts 4 and 5 of the Complaint fail to allege that the Defendant's willful and wanton negligence was the proximate cause of the Plaintiff's damages.

16. That the place where the negligence occurred is not sufficiently set out in the Complaint.

17. That the time when the negligence occurred is not sufficiently set out in the Complaint.


Attorneys for Defendant
Louisville & Nashville Railroad Company

FILED
APR 12 1965
ALICE J. DUCK, CLERK
REGISTER

4452

ALVIN SLAY, JR.,
Plaintiff,

-vs-

LOUISVILLE & NASHVILLE
RAILROAD COMPANY,
a corporation, ET AL.
Defendant.

DEMURRER

FILED
APR 12 1965
ALICE J. DUCK, CLERK
REGISTER

GREETINGS:

of Alvin Slay, Jr.,

Witness, this 25 day of March, 1965.

CLERK.

C O M P L A I N T

ALVIN SLAY, JR.,

PLAINTIFF.

VS.

LOUISVILLE & NASHVILLE
RAILROAD COMPANY, a
corporation and JOHN DOE,
RICHARD DOE, JOHN ROE and RICEARD
ROE, whose names are to your
plaintiff otherwise unknown, as
members of an L & N train crew,
DEFENDANTS.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW.

NO: 6450

COUNT ONE.

Plaintiff claims of the defendants the sum of Fourteen Hundred Fifty and No/100 (\$1450.00) Dollars, as damages for that heretofore on, to-wit, the 29th day of March, 1964, the defendants negligently set fire to and damaged and destroyed, to-wit, 20 acres of timber, young trees, pulpwood, and blueberry bushes, located on the ~~lands~~ of the plaintiff in Baldwin County, Alabama, of the value, to-wit, Fourteen Hundred Fifty and No/100 (\$1450.00) dollars, to plaintiff's great damage as aforesaid.

COUNT TWO.

Plaintiff claims of the defendants the sum of Fourteen
Hundred Fifty and No/100 (\$1450.00) dollars, as damages for

that heretofore on, to-wit, the 29th day of March, 1964, the timber, young trees, pulpwood, and blueberry bushes belonging to the Plaintiff on Plaintiff's 20 acres in Baldwin County, Alabama, was burned by reason of a fire communicated to it from the right of way of said defendants, and the plaintiff alleges that said fire was caught by negligence of the defendants, in that it negligently allowed dry grass and combustible matter to accumulate on its said right of way, to which fire was communicated from the engine of said defendants, and thence to plaintiff's property, destroying it, to the damage of plaintiff as aforesaid.

COUNT THREE.

The plaintiff claims of the defendants the sum of Fourteen Hundred Fifty and No/100 (\$1450.00) Dollars for that heretofore on, to-wit, the 29th day of March, 1964, the defendant by the negligence of his agents, servants or employees while acting within the line or scope of their employment, who were then and there engaged in the operation of a train of cars and an engine upon defendant's railway track in Baldwin County, Alabama, negligently set fire to grass, debris or other inflammable substance located and situate on the right of way of said defendant and negligently allowed said fire to burn and cross on to the lands of said plaintiff in Baldwin County, Alabama, burning over 20 acres of the said lands and burning, damaging and destroying timber, young trees, pulpwood, and blueberry bushes of said plaintiff of the value of, to-wit, Fourteen Hundred Fifty and No/100 (\$1450.00) Dollars.

COUNT FOUR.

The plaintiff claims of the defendants the further sum of Twenty-eight Hundred and No/100 (\$2800.00) Dollars, as damages for that heretofore on, to-wit, the 29th day of March, 1964, the defendant by the wilful or wanton actions of the said agents, servants or employees of said defendants while acting within the line or scope of their employment, who were then and there engaged in the operation of a train of cars and an

engine upon defendant's railway track in Baldwin County, Alabama, between the City of Bay Minette and the railroad station and Community of Perdido, Alabama, wilfully or wantonly threw from said train certain burning substances which were inflammable and which set fire to grass or debris situate on the right of way of said defendant and said defendant, its agents, servants or employees then and there operating said train, wilfully or wantonly allowed the fire so set to burn and proceed on to the lands of said plaintiff in Baldwin County, Alabama, and across said lands of said plaintiff damaging or destroying the timber, young trees, pulpwood, and blueberry bushes, of said plaintiff situate thereon the 20 acres of the plaintiff.

COUNT FIVE.

Plaintiff claims of the defendants the sum of Twenty-eight Hundred and No/100 (\$2800.00) Dollars, as damages for that heretofore, on, to-wit, the 29th day of March, 1964, the defendants wilfully or wantonly set fire to and damaged and destroyed, to-wit, 20 acres of timber, young trees, pulpwood, and blueberry bushes located on the lands of the plaintiff in Baldwin County, Alabama, of the value, to-wit, Twenty-eight Hundred and No/100 (\$2800.00) Dollars, to plaintiff's great damage as aforesaid.

TUCKER & HILDRETH

BY: 
ATTORNEYS FOR PLAINTIFF.

Plaintiff demands a trial by jury of the issues involved in this cause.

TUCKER & HILDRETH

BY: 
ATTORNEYS FOR PLAINTIFF.

STATE OF ALABAMA I
BALDWIN COUNTY I

TO ANY SHERIFF OF THE STATE OF ALABAMA,
GREETINGS:

You are hereby commanded to summon Louisville & Nashville Railroad Company, a corporation and John Doe, Richard Doe, John Roe and Richard Roe, whose names are to your plaintiff otherwise unknown to appear before the Circuit Court of Baldwin County, Alabama, at the place of holding the same and plead, answer or demur within thirty (30) days from service hereof to the complaint of Alvin Slay, Jr.,

Witness, this 25 day of March, 1965.

Alice X. Duck
CLERK.

C O M P L A I N T

ALVIN SLAY, JR.,
PLAINTIFF.

vs.

LOUISVILLE & NASHVILLE
RAILROAD COMPANY, a
corporation and JOHN DOE,
RICHARD DOE, JOHN ROE and RICHARD
ROE, whose names are to your
plaintiff otherwise unknown, as
members of an L & N train crew.
DEFENDANTS.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW.

NO: 6457.

COUNT ONE.

Plaintiff claims of the defendants the sum of Fourteen Hundred Fifty and No/100 (\$1450.00) Dollars, as damages for that heretofore on, to-wit, the 29th day of March, 1964, the defendants negligently set fire to and damaged and destroyed, to-wit, 20 acres of timber, young trees, pulpwood, and blueberry bushes, located on the lands of the plaintiff in Baldwin County, Alabama, of the value, to-wit, Fourteen Hundred Fifty and No/100 (\$1450.00) dollars, to plaintiff's great damage as aforesaid.

COUNT TWO.

Plaintiff claims of the defendants the sum of Fourteen Hundred Fifty and No/100 (\$1450.00) dollars, as damages for

that heretofore on, to-wit, the 29th day of March, 1964 the timber, young trees, pulpwood, and blueberry bushes belonging to the Plaintiff on Plaintiff's 20 acres in Baldwin County, Alabama, was burned by reason of a fire communicated to it from the right of way of said defendants, and the plaintiff alleges that said fire was caught by negligence of the defendants in that it negligently allowed dry grass and combustible matter to accumulate on its said right of way, to which fire was communicated from the engine of said defendants, and thence to plaintiff's property, destroying it, to the damage of plaintiff as aforesaid.

COUNT THREE.

The plaintiff claims of the defendants the sum of Fourteen Hundred Fifty and No/100 (\$1450.00) Dollars for that heretofore on, to-wit, the 29th day of March, 1964, the defendant by the negligence of his agents, servants or employees while acting within the line or scope of their employment, who were then and there engaged in the operation of a train of cars and an engine upon defendant's railway track in Baldwin County, Alabama, negligently set fire to grass, debris or other inflammable substance located and situate on the right of way of said defendant and negligently allowed said fire to burn and cross on to the lands of said plaintiff in Baldwin County, Alabama, burning over 20 acres of the said lands and burning, damaging and destroying timber, young trees, pulpwood, and blueberry bushes of said plaintiff of the value of, to-wit, Fourteen Hundred Fifty and No/100 (\$1450.00) Dollars.

COUNT FOUR.

The plaintiff claims of the defendants the further sum of Twenty-eight Hundred and No/100 (\$2800.00) Dollars, as damages for that heretofore on, to-wit, the 29th day of March, 1964, the defendant by the wilful or wanton actions of the said agents, servants or employees of said defendants while acting within the line or scope of their employment, who were then and there engaged in the operation of a train of cars and an

STATE OF ALABAMA Y
BALDWIN COUNTY Y

TO ANY SHERIFF OF THE STATE OF ALABAMA,
GREETINGS:

You are hereby commanded to summon Louisville & Nashville Railroad Company, a corporation and John Doe, Richard Doe, John Roe and Richard Roe, whose names are to your plaintiff otherwise unknown to appear before the Circuit Court of Baldwin County, Alabama, at the place of holding the same and plead, answer or demur within thirty (30) days from service hereof to the complaint of Alvin Slay, Jr.,

Witness, this 25 day of March, 1965.

Alice J. Luck
(CLERK.)

C O M P L A I N T

ALVIN SLAY, JR.,
PLAINTIFF.

vs.

LOUISVILLE & NASHVILLE
RAILROAD COMPANY, a
corporation and JOHN DOE,
RICHARD DOE, JOHN ROE and RICHARD
ROE, whose names are to your
plaintiff otherwise unknown, as
members of an L & N train crew,
DEFENDANTS.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW.

NO: 6450.

COUNT ONE.

Plaintiff claims of the defendants the sum of Fourteen Hundred Fifty and No/100 (\$1450.00) Dollars, as damages for that heretofore on, to-wit, the 29th day of March, 1964, the defendants negligently set fire to and damaged and destroyed, to-wit, 20 acres of timber, young trees, pulpwood, and blueberry bushes, located on the lands of the plaintiff in Baldwin County, Alabama, of the value, to-wit, Fourteen Hundred Fifty and No/100 (\$1450.00) dollars, to plaintiff's great damage as aforesaid.

COUNT TWO.

Plaintiff claims of the defendants the sum of Fourteen Hundred Fifty and No/100 (\$1450.00) dollars, as damages for

that heretofore on, to-wit, the 29th day of March, 1964, the timber, young trees, pulpwood, and blueberry bushes belonging to the Plaintiff on Plaintiff's 20 acres in Baldwin County, Alabama, was burned by reason of a fire communicated to it from the right of way of said defendants, and the plaintiff alleges that said fire was caught by negligence of the defendants, in that it negligently allowed dry grass and combustible matter to accumulate on its said right of way, to which fire was communicated from the engine of said defendants, and thence to plaintiff's property, destroying it, to the damage of plaintiff as aforesaid.

COUNT THREE.

The plaintiff claims of the defendants the sum of Fourteen Hundred Fifty and No/100 (\$1450.00) Dollars for that heretofore on, to-wit, the 29th day of March, 1964, the defendant by the negligence of his agents, servants or employees while acting within the line or scope of their employment, who were then and there engaged in the operation of a train of cars and an engine upon defendant's railway track in Baldwin County, Alabama, negligently set fire to grass, debris or other inflammable substance located and situate on the right of way of said defendant and negligently allowed said fire to burn and cross on to the lands of said plaintiff in Baldwin County, Alabama, burning over 20 acres of the said lands and burning, damaging and destroying timber, young trees, pulpwood, and blueberry bushes of said plaintiff of the value of, to-wit, Fourteen Hundred Fifty and No/100 (\$1450.00) Dollars.

COUNT FOUR.

The plaintiff claims of the defendants the further sum of Twenty-eight Hundred and No/100 (\$2800.00) Dollars, as damages for that heretofore on, to-wit, the 29th day of March, 1964, the defendant by the wilful or wanton actions of the said agents, servants or employees of said defendants while acting within the line or scope of their employment, who were then and there engaged in the operation of a train of cars and an

engine upon defendant's railway track in Baldwin County, Alabama, between the City of Bay Minette and the railroad station and Community of Perdido, Alabama, wilfully or wantonly threw from said train certain burning substances which were inflammable and which set fire to grass or debris situate on the right of way of said defendant and said defendant, its agents, servants or employees then and there operating said train, wilfully or wantonly allowed the fire so set to burn and proceed on to the lands of said plaintiff in Baldwin County, Alabama, and across said lands of said plaintiff damaging or destroying the timber, young trees, pulpwood, and blueberry bushes, of said plaintiff situate thereon the 20 acres of the plaintiff.

COUNT FIVE.

Plaintiff claims of the defendants the sum of Twenty-eight Hundred and No/100 (\$2800.00) Dollars, as damages for that heretofore, on, to-wit, the 29th day of March, 1964, the defendants wilfully or wantonly set fire to and damaged and destroyed, to-wit, 20 acres of timber, young trees, pulpwood, and blueberry bushes located on the lands of the plaintiff in Baldwin County, Alabama, of the value, to-wit, Twenty-eight Hundred and No/100 (\$2800.00) Dollars, to plaintiff's great damage as aforesaid.

TUCKER & HILDRETH

BY: 
ATTORNEYS FOR PLAINTIFF.

Plaintiff demands a trial by jury of the issues involved in this cause.

TUCKER & HILDRETH

BY: 
ATTORNEYS FOR PLAINTIFF.

STATE OF ALABAMA X
BALDWIN COUNTY X

TO ANY SHERIFF OF THE STATE OF ALABAMA,
GREETINGS:

You are hereby commanded to summon Louisville & Nashville Railroad Company, a corporation and John Doe, Richard Doe, John Roe and Richard Roe, whose names are to your plaintiff otherwise unknown to appear before the Circuit Court of Baldwin County, Alabama, at the place of holding the same and plead, answer or demur within thirty (30) days from service hereof to the complaint of Alvin Slay, Jr.,

Witness, this 25 day of March, 1965.

Alice J. Luck
CLERK.

C O M P L A I N T

ALVIN SLAY, JR.,
PLAINTIFF.

vs.

LOUISVILLE & NASHVILLE
RAILROAD COMPANY, a
corporation and JOHN DOE,
RICHARD DOE, JOHN ROE and RICHARD
ROE, whose names are to your
plaintiff otherwise unknown, as
members of an L & N train crew.
DEFENDANTS.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW.
NO: 64-57.

COUNT ONE.

Plaintiff claims of the defendants the sum of Fourteen Hundred Fifty and No/100 (\$1450.00) Dollars, as damages for that heretofore on, to-wit, the 29th day of March, 1964, the defendants negligently set fire to and damaged and destroyed, to-wit, 20 acres of timber, young trees, pulpwood, and blueberry bushes, located on the lands of the plaintiff in Baldwin County, Alabama, of the value, to-wit, Fourteen Hundred Fifty and No/100 (\$1450.00) dollars, to plaintiff's great damage as aforesaid.

COUNT TWO.

Plaintiff claims of the defendants the sum of Fourteen Hundred Fifty and No/100 (\$1450.00) dollars, as damages for

that heretofore on, to-wit, the 29th day of March, 1964, the timber, young trees, pulpwood, and blueberry bushes belonging to the Plaintiff on Plaintiff's 20 acres in Baldwin County, Alabama, was burned by reason of a fire communicated to it from the right of way of said defendants, and the plaintiff alleges that said fire was caught by negligence of the defendants, in that it negligently allowed dry grass and combustible matter to accumulate on its said right of way, to which fire was communicated from the engine of said defendants, and thence to plaintiff's property, destroying it, to the damage of plaintiff as aforesaid.

COUNT THREE.

The plaintiff claims of the defendants the sum of Fourteen Hundred Fifty and No/100 (\$1450.00) Dollars for that heretofore on, to-wit, the 29th day of March, 1964, the defendant by the negligence of his agents, servants or employees while acting within the line or scope of their employment, who were then and there engaged in the operation of a train of cars and an engine upon defendant's railway track in Baldwin County, Alabama, negligently set fire to grass, debris or other inflammable substance located and situate on the right of way of said defendant and negligently allowed said fire to burn and cross on to the lands of said plaintiff in Baldwin County, Alabama, burning over 20 acres of the said lands and burning, damaging and destroying timber, young trees, pulpwood, and blueberry bushes of said plaintiff of the value of, to-wit, Fourteen Hundred Fifty and No/100 (\$1450.00) Dollars.

COUNT FOUR.

The plaintiff claims of the defendants the further sum of Twenty-eight Hundred and No/100 (\$2800.00) Dollars, as damages for that heretofore on, to-wit, the 29th day of March, 1964, the defendant by the wilful or wanton actions of the said agents, servants or employees of said defendants while acting within the line or scope of their employment, who were then and there engaged in the operation of a train of cars and an

engine upon defendant's railway track in Baldwin County, Alabama, between the City of Bay Minette and the railroad station and Community of Perdido, Alabama, wilfully or wantonly threw from said train certain burning substances which were inflammable and which set fire to grass or debris situate on the right of way of said defendant and said defendant, its agents, servants or employees then and there operating said train, wilfully or wantonly allowed the fire so set to burn and proceed on to the lands of said plaintiff in Baldwin County, Alabama, and across said lands of said plaintiff damaging or destroying the timber, young trees, pulpwood, and blueberry bushes, of said plaintiff situate thereon the 20 acres of the plaintiff.

COUNT FIVE.

Plaintiff claims of the defendants the sum of Twenty-eight Hundred and No/100 (\$2800.00) Dollars, as damages for that heretofore. on, to-wit, the 29th day of March, 1964, the defendants wilfully or wantonly set fire to and damaged and destroyed, to-wit, 20 acres of timber, young trees, pulpwood, and blueberry bushes located on the lands of the plaintiff in Baldwin County, Alabama, of the value, to-wit, Twenty-eight Hundred and No/100 (\$2800.00) Dollars, to plaintiff's great damage as aforesaid.

TUCKER & HILDRETH

BY: 
ATTORNEYS FOR PLAINTIFF.

Plaintiff demands a trial by jury of the issues involved in this cause.

TUCKER & HILDRETH

BY: 
ATTORNEYS FOR PLAINTIFF.

August 22, 1966

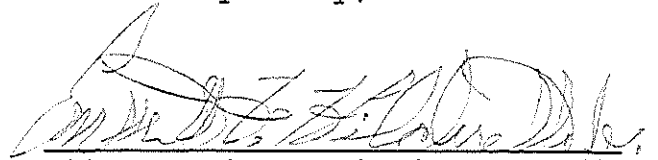
Judge of Circuit Court
Bay Minette, Alabama

Dear Sir:

Re: Alvin Slay, Jr., vs. L. & N.,
et al, No. 6450

The above case has been settled between the parties.
Will you please dismiss the above case at the cost of the
Defendant. Mr. Chason represents such Defendant and he will
present this letter to you in order to obtain such dismissal.

Yours very truly,


Attorney for Plaintiff

STATE OF ALABAMA X
BALDWIN COUNTY X

TO ANY SHERIFF OF THE STATE OF ALABAMA,
GREETINGS:

You are hereby commanded to summon Louisville & Nashville Railroad Company, a corporation and John Doe, Richard Doe, John Roe and Richard Roe, whose names are to your plaintiff otherwise unknown to appear before the Circuit Court of Baldwin County, Alabama, at the place of holding the same and plead, answer or demur within thirty (30) days from service hereof to the complaint of Alvin Slay, Jr.,

Witness, this 25 day of March, 1965.

Deane J. Alford
CLERK.

C O M P L A I N T

ALVIN SLAY, JR.,
PLAINTIFF.

vs.

LOUISVILLE & NASHVILLE
RAILROAD COMPANY, a
corporation and JOHN DOE,
RICHARD DOE, JOHN ROE and RICHARD
ROE, whose names are to your
plaintiff otherwise unknown, as
members of an L & N train crew,
DEFENDANTS.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

NO: 6450.

COUNT ONE.

Plaintiff claims of the defendants the sum of Fourteen Hundred Fifty and No/100 (\$1450.00) Dollars, as damages for that heretofore on, to-wit, the 29th day of March, 1964, the defendants negligently set fire to and damaged and destroyed, to-wit, 20 acres of timber, young trees, pulpwood, and blueberry bushes, located on the lands of the plaintiff in Baldwin County, Alabama, of the value, to-wit, Fourteen Hundred Fifty and No/100 (\$1450.00) dollars, to plaintiff's great damage as aforesaid.

COUNT TWO.

Plaintiff claims of the defendants the sum of Fourteen Hundred Fifty and No/100 (\$1450.00) dollars, as damages for

that heretofore on, to-wit, the 29th day of March, 1964, the timber, young trees, pulpwood, and blueberry bushes belonging to the Plaintiff on Plaintiff's 20 acres in Baldwin County, Alabama, was burned by reason of a fire communicated to it from the right of way of said defendants, and the plaintiff alleges that said fire was caught by negligence of the defendants, in that it negligently allowed dry grass and combustible matter to accumulate on its said right of way, to which fire was communicated from the engine of said defendants, and thence to plaintiff's property, destroying it, to the damage of plaintiff as aforesaid.

COUNT THREE.

The plaintiff claims of the defendants the sum of Fourteen Hundred Fifty and No/100 (\$1450.00) Dollars for that heretofore on, to-wit, the 29th day of March, 1964, the defendant by the negligence of his agents, servants or employees while acting within the line or scope of their employment, who were then and there engaged in the operation of a train of cars and an engine upon defendant's railway track in Baldwin County, Alabama, negligently set fire to grass, debris or other inflammable substance located and situate on the right of way of said defendant and negligently allowed said fire to burn and cross on to the lands of said plaintiff in Baldwin County, Alabama, burning over 20 acres of the said lands and burning, damaging and destroying timber, young trees, pulpwood, and blueberry bushes of said plaintiff of the value of, to-wit, Fourteen Hundred Fifty and No/100 (\$1450.00) Dollars.

COUNT FOUR.

The plaintiff claims of the defendants the further sum of Twenty-eight Hundred and No/100 (\$2800.00) Dollars, as damages for that heretofore on, to-wit, the 29th day of March, 1964, the defendant by the wilful or wanton actions of the said agents, servants or employees of said defendants while acting within the line or scope of their employment, who were then and there engaged in the operation of a train of cars and an

engine upon defendant's railway track in Baldwin County, Alabama, between the City of Bay Minette and the railroad station and Community of Perdido, Alabama, wilfully or wantonly threw from said train certain burning substances which were inflammable and which set fire to grass or debris situate on the right of way of said defendant and said defendant, its agents, servants or employees then and there operating said train, wilfully or wantonly allowed the fire so set to burn and proceed on to the lands of said plaintiff in Baldwin County, Alabama, and across said lands of said plaintiff damaging or destroying the timber, young trees, pulpwood, and blueberry bushes, of said plaintiff situate thereon the 20 acres of the plaintiff.

COUNT FIVE.

Plaintiff claims of the defendants the sum of Twenty-eight Hundred and No/100 (\$2800.00) Dollars, as damages for that heretofore, on, to-wit, the 29th day of March, 1964, the defendants wilfully or wantonly set fire to and damaged and destroyed, to-wit, 20 acres of timber, young trees, pulpwood, and blueberry bushes located on the lands of the plaintiff in Baldwin County, Alabama, of the value, to-wit, Twenty-eight Hundred and No/100 (\$2800.00) Dollars, to plaintiff's great damage as aforesaid.

TUCKER & HILDRETH

BY: *[Signature]*
ATTORNEYS FOR PLAINTIFF.

Plaintiff demands a trial by jury of the issues involved in this cause.

TUCKER & HILDRETH

BY: *[Signature]*
ATTORNEYS FOR PLAINTIFF.

CASE NO. 6450

ALVIN SLAY, JR.,

Plaintiff,

vs:

LOUISVILLE & NASHVILLE RAIDROAD
COMPANY, A Corp & JOHN DOE, RICHARD
DOE, JOHN ROE & RICHARD ROE, whose
names are to your plaintiff otherwise
unknown, as members of an L & N Train crew.

Defendants.

FILED

MAR 25 1965

NOT A CLERK
REGISTER

TUCKER & HILDRETH
Attorneys at Law

RECEIVED IN OFFICE

MAR 29 1965

M. S. BUTLER, Sheriff

EXECUTED BY SERVING A
COPY OF THE WITHIN

R.E. Stinner
as Statutory agent
for Louisville &
Nashville Railroad
Co.

This the 29 day of May 1965

M. S. BUTLER
Sheriff Montgomery County

By *White B. A.*
Deputy Sheriff

RECEIVED

MAR 25 1965

TAYLOR WILKINS
SHERIFF

The Sheriff claims 2
miles at 10¢ per mile for a total
of \$ 2.00
M. S. Butler, Sheriff
Montgomery County, Ala.