

HOME GARDENS LAND COMPANY,
a Corporation,
Plaintiff,

-VS-

WALKER D. HINES, DIRECTOR
GENERAL OF RAILROADS, operat-
ing the LOUISVILLE & NASHVILLE
RAILROAD,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALA.

The plaintiff claims of the defendant the sum of One Hundred Fifty (\$150.00) Dollars, as damages, for that on or about the 17th day of December, 1918, the defendant was operating a line of trains, propelled by means of steam, through Baldwin County, Alabama; and that on or about the above said date, the defendant, who was then and there operating said line of railroad trains by and through its agents or employees, so negligently operated one of its said trains that it ran upon and against one of plaintiff's mules at or near Mile Post No. 636 and at or near a crossing at Dyas, in Baldwin County, Alabama, and as a proximate result of said negligence, said train killed the said mule, all to the damage of the plaintiff in the above said amount; hence, this suit.

Chas. Hallix
Gordon Edington
ATTORNEYS FOR PLAINTIFF

Plaintiff demands a trial by Jury.

Chas. Hallix
Gordon Edington
ATTORNEYS FOR PLAINTIFF.

The State of Alabama, }
BALDWIN COUNTY.

Circuit Court

No.

Spring Term 191 9

To Any Sheriff of the State of Alabama :

You are hereby commanded to summon Walker D Hines, Director General of Railroads
operating the Louisville and Nashville Railroad.

to appear and plead, answer or demur, within thirty days from the service hereof, to the Complaint filed in the Circuit
Court of Baldwin County, State of Alabama, at Bay Minette, against him, Defendant.

by Home Gardens Land Company, a Corporation
Plaintiff

Witness my hand this 7th day of April 191 9

J. W. Richardson Clerk

COMPLAINT

Plaintiff Versus

The Plaintiff claims of the Defendant

Dollars due by

Plaintiff's Attorney.

1st Original

State of Alabama,

BALDWIN COUNTY.

Circuit Court

Home Gardens Land Company,

a Corporation.

vs.

Plaintiffs

Walker D Hines, Director

General of Railroads, operating

the Louisville and Nashville

Railroad

Defendants

SUMMONS AND COMPLAINT

Filed April 7th 1919

W. H. Hines Clerk

Defendant lives at

Chas Hall Gordon and

Eddington.

Plaintiff's Attorney

Defendant's Attorney

Times Print, Bay Minette.

Received in office

April 7th 1919

A. B. Richerson Sheriff

I have executed this Writ

this April 10 1919

by leaving a copy of the within summons and complaint with

E. E. Cooley
Agent for Walker
D Hines, Director
General of Railroads
and Agent for the
Louisville and Nashville
Railroad

A. B. Richerson Sheriff

Deputy Sheriff.

Home Gardens Land Company,
A Corporation.

vs

Louisville & Nashville Railroad
Company .

In Circuit Court of Baldwin
County, Alabama.

Comes the defendant and demurs to each count of the complaint separately upon each of the following grounds :

1. The allegations are too vague, indefinite, and uncertain to sufficiently advise the defendant of the cause of action against which it is called upon to defend.
2. The general allegation that a certain mule or animal was killed because of the negligence, or want of skill on the part of the defendant's agents in the management and running of its train or trains is not a sufficient statement of a cause of action against the defendant.

J. M. Hines + S. Jenkins
Attys for the Defendant.

Defendant demands trial by jury.