

STATE OF ALABAMA,
BALDWIN COUNTY.

IN THE CIRCUIT COURT-LAW SIDE.

TO ANY SHERIFF OF THE STATE OF ALABAMA--GREETING:--

You are hereby commanded to summon Louisville & Nashville Railroad Company, a Corporation, to appear before the Circuit Court of Baldwin County, Alabama, to be held for said County, at the place of holding same, then and there to answer the complaint of C. S. Woodson.

Witness my hand this 19 day of January, 1935.

Robert J. Duck
Clerk.

COMPLAINT.

C. S. WOODSON,
Plaintiff,

-vs-

LOUISVILLE & NASHVILLE
RAILROAD COMPANY, a
Corporation,
Defendant.

IN THE CIRCUIT COURT-LAW SIDE
STATE OF ALABAMA
BALDWIN COUNTY.

COUNT 1: The Plaintiff claims of the Defendant One Hundred Thirty Dollars (\$130.00) damages, for in this:- For that on, to-wit, January 23rd, 1934, he delivered to said Defendant at National Stock Yards, Illinois, twenty-six mules to be transported and delivered to him at Bay Minette, Alabama, by said Defendant for a reward, and that said Defendant received said mules as a common carrier to be delivered to the Plaintiff at Bay Minette, Alabama, for a reward, and Plaintiff further avers that said Defendant only delivered twenty-five mules to Plaintiff, and by reason thereof Plaintiff was damaged in the sum aforementioned.

COUNT 2: The Plaintiff claims of the Defendant One Hundred Thirty Dollars (\$130.00) damages, for in this:- That on, to-wit, the 23rd day of January, 1934, he delivered to

Defendant, a common carrier, twenty-six head of mules to be transported from National Stock Yards, Illinois, to Bay Minette, Alabama, for a reward, and Plaintiff further avers that in the transportation of said mules that Defendant, through its Agents, negligently injured one of the mules so delivered to it to such an extent that it was caused to die, to the damage of Plaintiff in the sum aforementioned.

COUNT 3: The Plaintiff claims of the Defendant the

further sum of Twenty-five Dollars (\$25.00) damages, for in this:- That on, to-wit, the 23rd day of January, 1934, the Plaintiff

delivered to the Defendant as a common carrier, to be delivered to the Plaintiff at Bay Minette, Alabama, for a reward, twenty-

six head of mules, and Plaintiff avers that due to the negligence of the agents or servants of said Defendant that when said mules

reached Bay Minette, Alabama, and were delivered to him, that one of said mules was, as a proximate cause of said negligence,

badly skinned, to the damage of Plaintiff in the sum aforementioned. COUNT 4: The Plaintiff claims of the Defendant the

further sum of Fifty Dollars (\$50.00) damages, for in this:- That on, to-wit, the 23rd day of January, 1934, the Plaintiff

delivered to the Defendant as a common carrier, to be delivered to the Plaintiff at Bay Minette, Alabama, for a reward, twenty-

six head of mules, and Plaintiff avers that due to the negligence of the agents or servants of said Defendant that when said mules

reached Bay Minette, Alabama, and were delivered to him, that one of said mules was, as a proximate cause of said negligence,

internally injured, to the damage of Plaintiff in the sum aforementioned.

COUNT 5: The Plaintiff claims of the Defendant the

further sum of Twenty-five Dollars (\$25.00) damages, for in this:- That on, to-wit, the 23rd day of January, 1934, the Plaintiff

delivered to the Defendant as a common carrier, to be delivered to the Plaintiff at Bay Minette, Alabama, for a reward, twenty-

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six head of mules, and Plaintiff avers that due to the negligence of the agents or servants of said Defendant that when said mules reached Bay Minette, Alabama, and were delivered to him, that one of said mules was, as a proximate cause of said negligence, made lame and sore, to the damage of Plaintiff in the sum aforementioned.

COUNT 6: Plaintiff claims of the Defendant the further sum of Six & 25/100 Dollars (\$6.25), for in this:- That on, to-wit, January 23rd, 1934, Plaintiff delivered to the Defendant twenty-six head of mules at National Stock Yards, Illinois, to be delivered to him at Bay Minette, Alabama. Said mules were received by the Defendant as a common carrier, and were to be delivered to the Plaintiff for a reward, and Plaintiff avers that when said mules reached Bay Minette, Alabama, due to the negligent handling of the same, several of them were injured so badly that it was necessary that they be treated by a veterinarian, and Plaintiff further avers that the Defendant directed Plaintiff to secure the services of a veterinarian and it would pay for the same, which the Plaintiff did, and paid for the use and benefit of said Defendant to said veterinarian the sum aforementioned, which said Defendant is now due Plaintiff.

COUNT 7: Plaintiff further claims of the Defendant the sum of Five Dollars (\$5.00) damages, in this:- That on, to-wit, the 23rd day of January, 1934, Plaintiff delivered to Defendant twenty-six head of mules at National Stock Yard, Illinois, to be delivered to him at Bay Minette, Alabama, and Defendant accepted said shipment as a common carrier, for a reward, and Plaintiff avers that on, to-wit, the 26th day of January, 1934, Defendant presented its freight bill for the transportation of said mules, which the Plaintiff paid, and Plaintiff further avers that in presenting said bill for transportation, or freight bill, that he

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was overcharged the sum of Five Dollars (\$5.00)--hence this suit.

COUNT 8: The Plaintiff claims of the Defendant Ninety-Two & 50/100 Dollars (\$92.50) damages, for in this:- That on, to-wit, the 23rd day of January, 1934, the Plaintiff delivered to the Defendant, a common carrier, at National Stock Yards, Illinois, twenty-six head of mules to be transported to Plaintiff at Bay Minette, Alabama, for a reward, and Plaintiff further avers that in the transportation of said mules Plaintiff so negligently handled said shipment of mules, by and through its Agents or servants, that as a proximate cause thereof one of the mules was so badly injured on its delivery at Bay Minette that it had died from the effects of said injuries, to the damage of Plaintiff in the sum aforementioned.

Hybart, Heard & Shason
Attorneys for Plaintiff.

Plaintiff demands a trial of
this cause by Jury.

Hybart, Heard & Shason
Attorneys for Plaintiff.

~~Excluded~~

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RECORDED
INDEXED

SUMMONS & COMPLAINT.

C. S. WOODSON,

Plaintiff,

VS.

LOUISVILLE & NASHVILLE
RAILROAD COMPANY, a corporation,

Defendant.

IN THE CIRCUIT COURT-LAW SIDE

STATE OF ALABAMA

BALDWIN COUNTY.

Filed January 19, 1935

Robert A. Heard
Clerk.

LAW OFFICES
HYBART, HEARD
& CHASON
BAY MINETTE, ALABAMA

Exhibited this 19th day of January-
1935. by serving a copy of the
with an summons & complaint
on R. E. Lookey as agent of the
Louisville & Nashville Rail Road
company

M. H. Wilkins
Sheriff