

JOYCE CAROLINE LLOYD, a
minor, suing by and through
WILLIE V. LLOYD, as Father
and next friend,

Plaintiff,

vs.

LOUISVILLE & NASHVILLE
RAILROAD COMPANY, a corpora-
tion,

Defendant.

X

X

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

9172

The Plaintiff claims of the Defendant the sum of Five Hundred Dollars (\$500.00) as damages for that heretofore on, to-wit: the 14th day of October, 1969, at a point on the Defendant's railroad line near Loxley in Baldwin County, Alabama, at its intersection with a public dirt road known as the Huggins Crossing, the Defendant, acting by and through its agents, servants or employees, who were then and there acting within the line and scope of their authority as such agents, servants or employees, did so negligently operate a freight train as to cause or allow the same to run into, upon or against a motor vehicle in which the Plaintiff was riding and as a direct and proximate result of such negligence of the Defendant, the Plaintiff was personally injured in that she received various lacerations, bruises and abrasions and was temporarily made sick, sore and lame, all to the damage to the Plaintiff in the sum above mentioned, hence this suit.


Attorney for Plaintiff

FILED

MAR 20 1970

ALICE J. DUCK CLERK
REGISTER

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PLEAS:

Comes now the Defendant in the above styled cause, by
and through its attorneys of record, and for answer to the Com-
plaint heretofore filed against it says, separately and severally,
as follows:

1. Not guilty.

CHASON, STONE & CHASON

By:

John S. Chason
Attorneys for Defendant

FILED

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ALICE J. DUCK

CLERK
REGISTER