

2514

PAGE HOLLAND COMPANY,

PLAINTIFF,

VS

MISS LILLIAN WARREN and
MR. CLAIR LOCKE, individually
and doing business as WARREN
AND LOCKE,

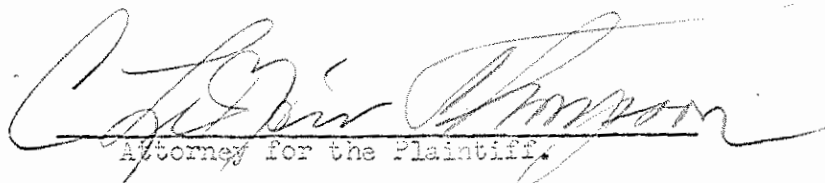
DEFENDANTS.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Comes the Plaintiff by its attorney of record and moves to dismiss
without prejudice said cause.


Attorney for the Plaintiff.

HUBERT M. HALL,
Plaintiff,

vs.

RAILWAY EXPRESS AGENCY,
A Corporation,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. _____

Comes the Defendant in the above styled cause and demurs to the Complaint filed in said cause and each and every Count thereof separately and severally and assigns the following separate and several grounds, viz:

1. That said Count does not state a cause of action.
2. That Count One of said Complaint does not allege who failed to deliver the goods described therein.
3. That Count One of said Complaint does not allege that the Defendant failed to deliver the goods described therein.
4. That Count One of the said Complaint does not allege that the Defendant is a common carrier.
5. That Count One of said Complaint claims damages for the failure to deliver certain goods and not for the injury complained of and said Count fails to allege that the hog described therein was not delivered.
6. That Count One of said Complaint fails to allege that the Defendant negligently injured the hog.
7. That Count Two of said Complaint affirmatively shows that the amount claimed thereunder was paid by the Plaintiff to the Defendant for delivery of the hog described therein and fails to allege that such hog was not delivered as complained upon.
8. That Count Two of said Complaint fails to allege any facts which would entitle the Plaintiff to recover the amount sued for in said Count.

Ramon Stone
Attorneys for Defendant

Defendant demands a trial of this cause by a jury.

Ramon Stone
Attorneys for Defendant.

FILED
Feb. 14, 1955
ALICE J. BUSH, Clerk

Minette, Alabama, which said gilt received injuries during transit, and while in the Defendant's possession, and as a proximate result of which she died, which sum of money, with the interest thereon, is still due and unpaid.

T H R E E:

The Plaintiff claims of the defendant SEVENTY AND 45/100 (\$70.45) DOLLARS for money paid by the Plaintiff for the Defendant on, to-wit: August 8, 1954, at its request, which sum of money, with the interest thereon, is still due and unpaid.

F O U R:

The Plaintiff claims of the Defendant SEVENTY AND 45/100 (\$70.45) DOLLARS for money, on to-wit: the 8th day of August, 1954, received by the Defendant to the use of the Plaintiff, which sum of money, with the interest thereon, is still due and unpaid.

FILED

Jan 2, 1955
ALICE J. BUCK, Clerk

J. T. Blackburn
Attorney for the Plaintiff

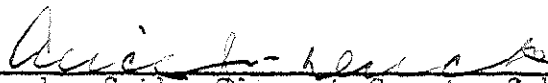
STATE OF ALABAMA)
*
BALDWIN COUNTY)

BOOK 003 PAGE 309

TO ANY LAWFUL OFFICER OF SAID COUNTY:

You are hereby commanded to summons Railway Express Agency, a Corporation, to appear before the next term of the Circuit Court of said County, at the place of holding the same, then and there to answer the complaint of Hubert M. Hall.

Witness my hand this 21 day of January, 1955.


Clerk of the Circuit Court of Baldwin
County, Alabama.

HUBERT M. HALL,

Plaintiff,

VS.

RAILWAY EXPRESS AGENCY, a
Corporation,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW NO. _____

O N E:

The Plaintiff claims of the Defendant FIVE HUNDRED TWENTY FIVE AND 00/100 (\$525.00) DOLLARS, damages for the failure to deliver certain goods, viz: One Registered Duroc Bred Gilt, received by it as a common carrier, at Topeka, Kansas, on to-wit: August 1, 1954, to be delivered to the Plaintiff at Bay Minette, Alabama, for a reward, which said gilt, while in said carrier's possession, and during transit, was injured, and as a proximate consequence of said injury died, which sum of money, with the interest thereon, is still due and unpaid.

T W O:

The Plaintiff claims of the Defendant SEVENTY AND 45/100 (\$70.45) DOLLARS due from it, on to-wit: August 8, 1954, as money paid by the Plaintiff to the Defendant as charges for the delivery of one Registered Duroc Bred Gilt, from Topeka, Kansas, to Bay

Received 21 day of May 1955
and on 25 day of May 1955
I served a copy of the within BCC

By service on Railway Express
Agency, a corp.
Zonnie Forte
Agent
TAYLOR WILKINS, Sheriff
By J. B. Blackburn D. S.

NO 2514
SUMMONS and COMPLAINT

HUBERT M. HALL,
Plaintiff,
VS.
RAILWAY EXPRESS AGENCY, a
Corporation,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO.

FILED
J. B. BLACKBURN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA
27 1955
May 27, 1955