

THOMPSON & WHITE

Attorneys-At-Law

BAY MINETTE, ALABAMA

June 22, 1962

C. LeNoir Thompson  
Mary Thompson White

937-3921  
Phones : 937-7487  
937-8355

Mrs. Alice J. Duck, Clerk  
Circuit Court  
Bay Minette, Alabama

Re: G. S. Sanks  
vs.

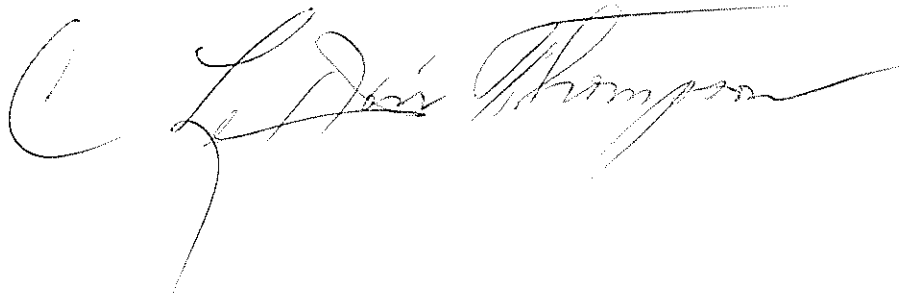
L. & N. Railroad

# 5074

Dear Mrs. Duck:

Please note the withdrawal of record of the firm of  
Thompson & White as attorneys for G. S. Sanks in the above  
styled case, set on your jury docket.

Sincerely,



CLT/hm

SULLIVAN SANKS,

Plaintiff,

vs.

LOUISVILLE & NASHVILLE  
RAILROAD COMPANY, A  
Corporation,


Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA


AT LAW

Comes the Defendant in the above styled cause and demurs to the complaint filed in said cause and assigns the following separate and several grounds, viz:

1. That said complaint does not state a cause of action.
2. That the allegation "the plaintiff says" is not an allegation of fact.
3. The complaint does not allege any duty owing by the Defendant to the Plaintiff.
4. The place where the accident occurred is not sufficiently set out.
5. The complaint does not sufficiently set out the time when the accident occurred.
6. It is not alleged whether the accident occurred at a public crossing.

  
Attorneys for Defendant

Defendant demands a trial of this  
cause by a jury.

  
Attorneys for Defendant

FILED

MAR 30 1962

ALICE J. DUCK, CLERK  
REGISTER

SULLIVAN SANKS,  
Plaintiff,

vs.

LOUISVILLE & NASHVILLE  
RAILROAD COMPANY, A Cor-  
poration,

Defendant

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IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

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DEMURRER

\*\*\*\*\*

FILED  
MAR 30 1962  
ALICE J. DUCK, CLERK  
REGISTER

SULLIVAN SANKS

Plaintiff

vs

LOUISVILLE & NASHVILLE RAILROAD  
COMPANY, A CORPORATION

Defendant

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

5074

Plaintiff claims of the defendant Two Hundred (\$200.00) Dollars damages for that heretofore on, to-wit, November 18, 1961, the defendant was engaged in the operation of a railroad in Baldwin County, Alabama, and the plaintiff says that on the date aforesaid at or near the community of Dyas about seven miles more or less from the Town of Bay Minette, in said county, the defendant's agents or servants, while acting within the line and scope of their employment, negligently ran one of its trains into, over or against a cow, the property of the plaintiff, and as a proximate consequence thereof the cow died; hence this suit.

THOMPSON & WHITE

BY:

*C. L. Thompson*  
Attorneys for Plaintiff

FILED

MAR 12 1962

ALICE J. DUCK,

CLERK  
REGISTER

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. ....

..... TERM, 19 .....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Louisville & Nashville Railroad Company,  
a corporation

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 \_\_\_\_\_

Louisville & Nashville Railroad Company, a corporation, Defendant....

by Sullivan Sanks

\_\_\_\_\_, Plaintiff....

Witness my hand this 13 day of March 1962

Exp-3-14-62

Alice J. Duck, Clerk

No. 35074

Page \_\_\_\_\_

**THE STATE OF ALABAMA**  
BALDWIN COUNTY

**CIRCUIT COURT**

Sullivan, Shanks

Plaintiffs

vs.

Louisville & Nashville  
Railroad Co - a corp

Defendants

**SUMMONS and COMPLAINT**

Filed

**FILED**

, 19

**MAR 12 1962**

, Clerk

ALICE J. DUCK, CLERK

Thompson & White

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

3/13

, 1962

, Sheriff

I have executed this summons

this

3-14

, 1962

by leaving a copy with

L & N Railroad

By Luning

R R Russell

Agent

Lyons Wilkins

Sheriff

D. A. Talbert

Deputy Sheriff