

Floyd Circuit Court.

Roberty Laferty Plaintiff

vs. Petition;

Cliff Coal Company Defendants.

The plaintiff states that the defendant, The Cliff Coal Company, is a corporation, incorporated by the laws of the State of Kentucky, and as such has the authority to contract and be contracted with, sue and be sued in its corporate name, and to mine, operate, sell and dispose of coal from its mine, and to do any and all kinds of business as a corporation under its corporate name, The Cliff Coal Company.

The defendant, Roberty Laferty, further says that heretofore he has been employed by and worked for the said plaintiff in mining and delivering coal from the banks in the mine on to the main line or entrance in the said coal company's mine where it is operating and has been operating near Cliff, Kentucky, and on the 16th day of November, 1913, that by the carelessness and negligence of the said coal company, its servants, agents and employees that his right hand, arm and fingers were caught by one of the mining cars as he and other employees were pushing a car out from one of the rooms or entrances where he was operating in the coal mine for the said plaintiff; that his said hand, arm and especially his ring finger on his right hand was out, mingled and bruised to such an extent by the carelessness and negligence of the said plaintiff that he suffered many days and weeks with anguish and pain from the said injury, and that he still suffers to considerable extent with pain and anguish in his right hand, finger, arm and right side; that he was bringing out a car from his room where he was operating and that the plaintiff by its agents, servants and employees were bring-