

Floyd Circuit Court

Wilson Crisp

Plff

against

S. P. Jennings,

J. E. Ellis,

Helton, &

Samuel Bramham,

Deft

Petition

The Plaintiff Wilson Crisp says that the defendants Jennings and Ellis are contractors with the Big Sandy Railway Co. to build a section of a Railway in Floyd County Kentucky just above the mouth of Beaver Creek and they had employed to help build this Railway, Helton and Bramham Co. defendants herein. Helton was the Walking Boss and Bramham was the Crew Boss. The two bosses was employed and engaged by their Co deft Jennings & Ellis as bosses for them in working on said road and that they a great many hands working them, and the said bosses Helton and Bramham and among the number of hands engaged in working for deft on said Road was the Plff. he says that on or about the 11th day of November 1902, while engaged in laboring on said road for deft as a hand engaged by deft to work and labor on the Railway at work at which he never had any experiance never having done such work a fact well known to defendants agents and while so engaged at work he was ordered and directed by deft agents to work on said road at a particular point which he did and