



## NATIONAL ARCHIVES OF IRELAND

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6800

*Thomas Brisbane Alexander.*

REPORTED ON BY COMMITTEE

(18 JAN. 1917)

*British Dominions General  
Insurance Co. Ltd. as per claim  
returned*

*Jan 21/17*



PROPERTY LOSSES (IRELAND) COMMITTEE, 1916.

Inspector's Report.

Claim No. 6800.

Name of Claimant Thos Erskine Alexander Occupation Solicitor.

Situation of Property Vicinity Dundalk Hartshillingham, Co. Louth.

Description	Claim	Insurance (if any)	Valuation of Buildings (Commissioner of Valuation)	Inspector's Valuation of full Damage	Loss Payable on basis of Insurance	Excess of Loss over and above amount payable under the Policies of Insurance
Motor Car	30.0.6	Motor Risk & Clause		25.10.6	-	25.10.6
Consequential:- Hire of Taxi &c.	10.0.0	-		-	-	-
Law Costs	46.14.0	-		-	-	-
Do	30.0.0			-	-	-
TOTALS, £	116.14.6	Motor		25.10.6	-	25.10.6

Interests in the buildings

Remarks

I have made all the necessary investigations into this claim, and consider £25.10.6 reasonable compensation.

As will be observed from the relative Correspondence, and the pleadings as between the claimant and the Co-insuring office i.e. the British Dominion General Insurance Co. Ltd., the claim, as originally instituted

Signature

Date

Award of Committee: Contents

Do.

Buildings

went forward for Trial, and the Insurance Company succeeded with costs on the Risk &c. Clause, as embodied in their Policy.

B. Hyndley  
12<sup>th</sup> Janry. 1917.

£25.10.6

W.P.

REPORTED ON BY COMMITTEE

18 JAN. 1917



Confidential

District Inspector's Office

R. I. Constabulary  
Dundalk

12 January 1916

Mr. T. Erskine Alexander's Claim.  
Sir,

I beg to report that  
Mr. T. Erskine Alexander's  
motor car was commandeered  
by the rebels at Lurganore  
between Dundalk and  
Castleblennyham on 24<sup>th</sup>  
April 1916 and taken by them  
into Co Meath where it was  
subsequently released. The police  
cannot give any particulars  
as to the amount of damage  
done to the car but there is no  
doubt about its being taken  
by the rebels.

I am

Sir,

R. Ingoldsby Esq.

19 Sandford Terrace  
Sandford Road  
Dublin

Your obedient servant

W. Morris  
D. McC

Received  
13/1/16  
Br.



T. ERSKINE ALEXANDER.  
SOLICITOR.

Telephone No 1501.



29, DONEGALL STREET,  
BELFAST.

4th. January, 1917.

Dear Sir,.

Motor Car Claim.

No. 6800.

I am in receipt of yours  
of 3rd. inst., and as requested I enclose you my  
Motor Car Policy with the British Dominions Company,  
Number, C 3170.. It is my first Policy as you will  
see and recited the payment of the premium. I also  
enclose you Messrs. Denbys' estimate and their receipt  
for repairs. I also enclose you receipt from Messrs.  
McIlldowie for the Costs in the Action by me against  
the British Dominions amounting to £46. 14. 0.

Any further information  
you may require I shall be happy to let you have on  
hearing from you.

Yours faithfully,.

R. Ingowstz. Esq.  
Property Losses Committee.  
19. Sandford Terrace.  
Sandford Road.  
DUBLIN.

*Received*  
*5-17*  
*B.S.*



TELEGRAMS:—"DENBY,

TELEPHONE NO 858.



CLIFTONVILLE,  
BELFAST"



# WILLIAM DENBY & SONS,

Motor Carriage Builders,

ANTRIM ROAD,

*Belfast,* July 7th, 1916.

T.E. Alexander Esq.,

29 Donegall St.

BELFAST.

Dear Sir,

Yours received enclosing cheque value  
£25.10.6. in settlement of a/c, for which please  
accept our best thanks. Enclosed please find  
receipt.

We are very pleased indeed that the Car  
has turned out to your satisfaction.

Yours faithfully,

*Wm Denby & Sons*  
CB





TELEGRAMS: "DENBY, CLIFTONVILLE, BELFAST."  
TELEPHONE No. 858.

Cliftonville Motor Carriage Works,  
Antrim Road,



Belfast, June 30th, 1916.

M

T.E. Alexander Esq.,

29 Donegall St.

TO WILLIAM DENBY & SONS, DR.

MOTOR BODY BUILDERS.

Motor Bodies designed and Built to suit any Chassis.

June.	24.	To amount per invoice	£17. 14. 6.
"	"	" " " "	7. 16. 0.
			£25. 10. 6.

July 7th By Cheque  
Wm Denby & Sons.  
E. No.

£25. 10. 6.

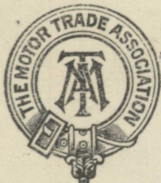
With thanks.



TELEGRAMS:—"DENBY,

CLIFTONVILLE,  
BELFAST"

TELEPHONE NO 858.



*No. 2*

# WILLIAM DENBY & SONS,

Motor Carriage Builders,

ANTRIM ROAD,

*Belfast,* May 4th, 1916.

T. E. Alexander Esq.,

Minerva Limousine.

Taking spout moulding of roof filling up cracks & covering with mole & whitelead, replacing mouldings etc.	£3. 0. 0.
Repairing bottom half of wind screen & tightening glass in same.	12. 0. ✓
Straightening one hind mudguard.	3. 6. ✓
Repairing front seat cushion & restuffing & new buttons & repairing trimming inside where required.	1. 5. 0.
Taking brass angle plate of edge of footboards planing off same & replacing.	4. 0. ✓
Pumicing down painting & varnishing remainder of Car.	10. 0. 0. ✓

£15. 4. 6.

7. 16. 0

23. 0. 6



Bentley's Estimates

Summer Session 1916  
C. of the City of Belfast

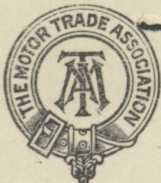
Thos E. Alexander } Entered for  
The Bishop's Dominions } Ref.  
for L. Ins. & C. P. }  
W. Skinning  
Repr.  
1 Aug. 1916



TELEGRAMS:—"DENBY,

CLIFTONVILLE,  
BELFAST"

TELEPHONE NO 858.



*No 1*

# WILLIAM DENBY & SONS,



Motor Carriage Builders,

ANTRIM ROAD,

*Belfast,* May 4th, 1916.

T.E.Alexander Esq.,

Minerva Limousine.

Repairing top back panel, where damaged, opening  
& replacing upholstery.

15.0.

Adjusting near side door setting hinges & new  
lace check strap.

6.0.

• Taking dents out of back of petrol tank.

10.0.

• Straightening 2 front mudguards.

5.0.

Paint top back panel & quarters, 2 front & one  
hind mudguards, two front doors, scuttle dash,  
petrol tank, valances. Polishing glass frame &  
tool box.

6. 0.0.  
£7. 16.0.



Summer Session 1915  
Co. of the City of Belfast

Mr S. Alexander

The British Dominions  
Genl, des Col. Lt.

Robert L.  
P. S.

W. S. S. S.

Rep.

1 Aug 1915



G. M<sup>rs</sup> ILDOWIE & SONS,  
SOLICITORS.

*Arthur Square & Corn Market,*

*Belfast, 30th Decr, 1916.*

T. E. Alexander Esq.,  
Solicitor,  
Donegall Street,  
Belfast.

You -V- British Dominions.

Dear Sir:-

We beg to acknowledge receipt of your letter of the  
29th inst. and cheque for £46 - 14 - 0 being in full settle-  
ment of Defendant's costs in this Action as arranged.

Wishing you the Compliments of the Season,

We are,

Yours faithfully,

*Geo M Ildowie & Sons.*  
30/2/16. *mm.*







29, DONEGALL STREET,  
BELFAST.

6800

19th. December, 1916.

Dear Sir,.

Re Damage to Motor Car.

I am in receipt of yours of  
18th. inst., sending me two forms of Claim which I have  
completed in accordance with the instructions and made  
Declaration before Justice and now return same.

I also enclose you a copy of  
the evidence of my Chauffeur, William Donnelly, for your  
information,.

Yours faithfully,.

A handwritten signature in dark ink, appearing to be "J. J. Healy", with a long horizontal flourish underneath.

J. J. Healy Esq.  
Secretary.  
Property Losses Committee.  
51. Stephen's Green.  
DUBLIN.



6800

# Property Losses (Ireland) Committee, 1916.

51 ST. STEPHEN'S GREEN, EAST, DUBLIN.

## Claim for Damages caused during the Disturbances on the 24th April, 1916, and following days.

Ad Rd  
20/12/16

I Thomas Eustine Alexander now residing  
at 29 Donegall Street in the City of Belfast  
do hereby solemnly and sincerely declare that on or about the 24<sup>th</sup> day of April  
1916, damage was done to the undermentioned Property, namely:—\*

\* State  
situation of  
property  
damaged.

a motor car

and such damage was occasioned to the best of <sup>my</sup>~~our~~ belief by\*\* an armed  
body of Sinn Feiners

\*\* Here state  
cause of  
damage.

And I further declare that the Property and Articles specified on the other side were  
so destroyed or damaged; that the Cost Price of same was as shown in each case;  
that at the time of the destruction or damage they were respectively of the Values  
specified under the head "Value of Property at time of Destruction or Damage";  
and that, in consequence of such destruction or damage, claim is hereby made for the  
sums specified under the head "Amount Claimed"; that the Claim is made by <sup>me</sup>~~us~~  
as† Owner; and that no person is interested in  
the said property except‡ myself

† Insert  
"Owner,"  
"Lessee,"  
or  
"Mortgagee,"  
as the case  
may be.

‡ Insert  
"myself," or  
"ourselves,"  
and the names  
of Mortgagees,  
Mortgagees,  
Lessors,  
Lessees, or  
joint owners  
(if any).

and that it is not insured by <sup>me</sup>~~us~~ or any other person, § except as follows, namely:—  
British Dominions  
General Insurance Company, Ltd, Policy No. C3140, Amount £ 450—

§ Strike out  
the words  
following if  
the property is  
not insured.

\_\_\_\_\_, " \_\_\_\_\_, " \_\_\_\_\_, " £ \_\_\_\_\_  
\_\_\_\_\_, " \_\_\_\_\_, " \_\_\_\_\_, " £ \_\_\_\_\_

And I make this solemn Declaration conscientiously believing the same to be true, and by  
virtue of the provisions of the Statutory Declarations Act, 1835.

Made and subscribed the 19<sup>th</sup> day of  
December 1916, at Donegall  
Street in the said City,  
County,

before me, a Justice of the Peace for the said  
City SARONACK J.P.  
County.

Signature  
of Claimant  
of Claimants

Thomas Eustine Alexander

NOTE—This Claim is to be furnished in duplicate, and should be accompanied by the Policies of Fire Insurance  
and the last receipt, in each case, or certified copies of same. When completed it is to be forwarded to the  
Secretary of the Committee, 51 St. Stephen's Green, East, Dublin.



## PARTICULARS OF THE CLAIM.

(TO BE GIVEN IN DETAIL.)



WILLIAM DONNELLY. I am Chaffeur to Mr Alexander. I recollect Easter Monday 24th April. / We left Fairy House about 5 o'clock on that day. When we came to Drumiskin the Car was stopped. Mr Alexander and its occupants got out of the Car. He directed me to drive the men wherever they required me to drive them. One of the men told me to turn the car and I did so. / One Chap got in beside me and said I was not to get out of the Car. / Six more men got into the Car. / The one beside me told me to start and to keep about 100 yards behind the Car in front. / I obeyed. The front Car pulled up at Castlebellingham and I pulled up to. All the cars behind me also pulled up. / When I pulled up the Man beside me got out and five of the men inside got out leaving one man inside the Car. They went into the Shops for bread and goods. I heard shots. Afterwards the men re-entered the Car. Then we started off and we went on till we arrived at a cross roads where we branched off the main road. / We went up that road until it was becoming dark and we met a bread cart. / The Motors all stopped and took the bread. / We started again and continued on the same road till Midnight when we came to another cross roads. The first car crossed and finding that it was on the wrong road suddenly pulled up. / I did the same. And the Car behind me bumped into my Car. The Car in front turned and I followed. They told the Car behind me to back a bit. / I backed a little bit too. My Car and the front one turned. / The front Car took a different road and I followed and the others followed. Before we came into the Village of Slaine a Car in passing me passed too close and scraped the side of my Car. / We stopped before we came to the Village of Slaine. They filled all the cars with water and told the Drivers to put all the petrol they had in the cars. That was done. We



went through the Village to another cross roads where we all stopped. / The front Car and my Car and two others took the road to the right. / We continued about 2 or 3 miles along that road and then stopped. / The men got out. Some of them went away and some remained. / We stopped there till daylight. I got out too and spent the time moving about. One of the men slept in the Car. Some of them told me to turn back to the cross roads. I turned back a bit. / I then went alone to the corss roads - about a quarter of a mile from where I was. / They asked me to see if there were any of the Cars there. I turned at the cross roads and went back. At the cross roads I found a parcel. I put it in the Car thinking it was a Motorists outfit. I came back to the same place. / When the men saw me they went on before me. They were examining a Car. I stopped when I got up to them. They didn't get in. / I stopped and looked at the Car on the road. I knew it was a Belfast Car. I took the number and I took the rugs and Umbrellas out of it into my Car. I arrived at the place I had left for the cross roads. / The men arrived at the same time. We started again and passed Tarra Hill and we passed through another Village. / When we stopped again I noticed a sign post "Dublin 12 miles". I don't know the name of the place. The men got out. One of the men said he had done with me and shook hands and thanked me. / I asked him if it would be safe to go into Dublin for petrol. He said it would but to keep away from the Phoenix Park. The men went off through the fields. Then we went to Dublin arriving there about 6 o'clock. The three Cars went to Thompson's Garage and got a tin a piece of petrol. Then we had a walk through the City. / About 10 o'clock on Tuesday morning we



went back to the Garage and took the Cars out and started for home. When we arrived at Julianstown near Drogheda my tyre burst and I put on a new wheel. When doing that the Sergeant came down and looked into the Car and asked me where I had been. I told him. He didn't believe me. He said the Car was very suspicious. He examined the Car. He found the parcel and a cartridge. The parcel contained Daggers. He said these things were suspicious and he would have to detain me pending further enquiries. He took me to the Barrack Yard. He brought me in and questioned me. I was kept there all Tuesday night and about 110'clock on Wednesday he told me the report he had received was that my character was good. He sent me with a Policeman and two Guns and ammunition to Laytown to the Military people there and from there I lifted a Policeman and Military Officer and brought the Police to Julianstown and the Officer with the Sergeant to Gortonstown. After I left the Officer there I brought the Sergeant to another Barracks. I brought him back to Julianstown. He said I was free and he gave me a letter of character. I then came home.



Re Damage to  
M<sup>r</sup>. T. E. Alexanders  
Motor Car

"Copy"

EVIDENCE,  
of  
William Donnelly.



T. ERSKINE ALEXANDER.  
SOLICITOR.

Telephone No 1501.



29, DONEGALL STREET,  
BELFAST.

15th. December, 1916.

Dear Sir,.

*Rego send  
form for insurance  
9/12/16  
Dunlop  
18/12/16*

I beg to bring under your Notice the following facts in connection with Damage to my Motor Car on the 24th. day of April last. I was returning with Mrs. Alexander and some friends from the Fairyhouse Races on the afternoon of last Easter Monday when a party of Sinn Fein Rebels commandeered my Car and took it away and damaged it very considerably.

I was insured and I applied to the Insurance Company for Compensation but they refused and I Instituted proceedings to recover damages. I enclose you copy of my Affidavit for Substitution of service on Defendants and also copy of the Pleadings which will enable you to see the extent of the Damage done. The Actual Damage done to the Car amounted to £23. 0. 6. and the burst tyre cost £7. and I was put to £10. of expense in getting a Taxi from Belfast to come to Dundalk for us the following morning having to stay there in the Hotel over night with my Wife and four friends. Of course, I was out very considerably for Law Expenses and I have had to pay the Defendants' Costs as well but



1. ERSKINE ALEXANDER.  
SOLICITOR.  
Telephone No 1501.

29, DONEGALL STREET,  
BELFAST.

15th. December, 1916.

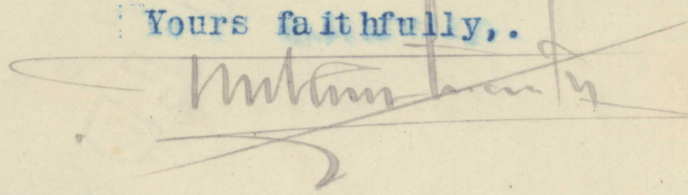
(2)

I do not expect that the Government could be asked for these.

I may mention that after the Rebels had done with the Car it was used on the Tuesday and part of the following day (Wednesday) by the Police and the Military. I think, under the circumstances I am entitled to be paid by the Government, at least, the three sums I have mentioned. I will feel greatly obliged if you will give the matter your consideration. Any further information you may require I shall be happy to let you have on hearing from you, or if you wish I will go up to Dublin myself and see you about the matter.

You may wonder at the great delay in making this Claim to you but I was anxious, if possible, to hold the Insurance Company liable. The Jury disagreed but the Judge directed a Verdict for the Defendants.

Yours faithfully,.



J. J. Healy Esq.  
Property Loss Committee.  
51, Stephen's Green East.  
DUBLIN.



In the Matter of the Supreme  
Court of Judicature Act (Ireland)  
1877 and in the Matter of an  
Intended Action.

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BETWEEN:-

Thomas Erskine Alexander.

PLAINTIFF.

AND

The British Dominions General  
Insurance Company Limited.

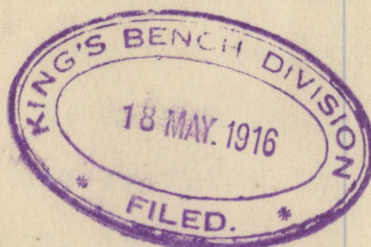
DEFENDANTS.

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Copy.

A F F I D A V I T.

*th*  
*Filed 18 May 1916*  
*10 Folios @ 1<sup>st</sup> 10<sup>d</sup>*



William Alexander.  
Solicitor.  
5. Lombard Street, Belfast. &  
15. Wicklow Street.  
DUBLIN.





In the Matter of the Supreme Court of  
Judicature Act (Ireland) 1877 and in  
the Matter of an Intended Action.

BETWEEN:-

Thomas Erskine Alexander.

PLAINTIFF.

AND

The British Dominions General  
Insurance Company Limited.

DEFENDANTS.

---

I, Thomas Erskine Alexander, of 29.  
Donegall Street, in the County of the City of Belfast,  
Solicitor, make Oath and say as follows:-

1. I am the Plaintiff in this intended Action.
2. The intended Defendants have their Head Office  
at No.1. Royal Exchange Avenue, London, E.C.
3. The intended Defendants are an Insurance  
Company and I am informed and believe that the Share-  
holders therein are all British subjects.
4. By a Policy of Insurance dated the 14th. day  
of March, 1916, subject to the annual premium of  
£14. 15. 0., it was witnessed that the said intended  
Defendants thereby undertook subject to the conditions  
therein contained to pay or make good to me all damage  
to or loss to my Minerva Limousine 24.8 H.P. Car and



have a good cause of Action against the Defendants under said Policy. I say that my Car was stolen from me and that it has been maliciously damaged and one of its tryes destroyed by third parties. A correspondence has taken place between Messrs Reid the Defendant's Agents and me concerning the damage and Messrs Reid wrote me to say that the Defendants stated that any damage which might have been done to the Car through being taken possession of by Rioters was not covered by the terms of the Policy which specially excluded such occurrences. I beg to refer to true copies of my letters to Messrs Reid and to Messrs Reid's letters to me upon which pinned together and marked with the letter " C " I have written my name at the time of swearing this Affidavit.

8. Having regard to the comparative cost and convience of proceedings in Ireland and England I believe that a Trial of said intended Action could very much more conviently and very much more cheaply be had in Ireland.

The facts herein deposed to are within my own knowledge or derived from the Documents herein mentioned save were otherwise stated.

Sworn at Belfast in the County of the City of Belfast, this 14<sup>th</sup> day of May, 1916, before me a Commissioner to administer Oaths for the High Court of Justice in Ireland in and for said County and I know deponent)

*T. Brooke Alexander*

*Sam. Campbell Comr.*

This Affidavit is filed on behalf

*Conrad*  
*14/10/16*



of the Plaintiff by William Alexander, Solicitor,  
15. Wicklow Street, Dublin, and 5. Lombard  
Street, Dublin.



**Writ of Summons.**

1916.

No. 4746.

**In the High Court of Justice in Ireland.**

KING'S BENCH

DIVISION.

**Between**

(Stamp 2/-)

Thomas Erskine Alexander,

*Plaintiff*

AND

The British Dominions General  
Insurance Company Limited.

*Defendants*

~~GEORGE the FIFTH~~  
~~EDWARD VII.~~, by the Grace of God of the United Kingdom of  
Great Britain and Ireland, and of the British Dominions beyond the seas, King,  
Defender of the Faith: To ~~The British Dominions General Insurance~~  
~~Company Limited~~ having their Registered office at No. 1 Royal  
Exchange Avenue in the County of the City of London E.C.

(SEAL)

of  
in the County of ~~The British Dominions General Insurance Co. Ltd.~~  
We command you, That within ~~14~~ Days after the service of this Writ on you,  
exclusive of the day of such Service, you do cause an Appearance to be entered  
for you in an Action at the Suit of

(SEAL)

Thomas Erskine Alexander

(SEAL)

And Take Notice that in default of your so doing, the Plaintiff may proceed  
therein, and Judgment may be given in your absence.

~~Witness~~—THE RIGHT HONORABLE ~~SIR SAMUEL WALKER, BART.~~, Lord  
High Chancellor of Ireland, at Dublin, this ~~25~~—day of ~~May~~ —  
in the Year of our Lord One Thousand Nine Hundred and ~~sixteen~~. —

Wm. Alexander,

Solicitor for the Plaintiff.

N.B.—This Writ is to be served within TWELVE Calendar Months from the date  
thereof, or, if renewed, within SIX Calendar months from the date of the  
last renewal, including the day of such date, and not afterwards.

The Defendants may appear hereto by entering an Appearance, either personally  
or by Solicitor, at the Record and Pleadings Office of the above Division,  
Four Courts, Dublin

Issued pursuant to Order 23 May 1916.



~~STATEMENT OF CLAIM~~

THE PLAINTIFF'S CLAIM IS for damages for breach of a Contract  
of Insurance made in writing between the Plaintiff and  
the Defendants and dated the 14 day of March 1916.

T.W. BROWN.

Col.

Signed, \_\_\_\_\_



and £ : : for costs; and upon payment of  
£ : : and £ : : for Costs  
within four days after Service hereof, further proceedings will be stayed.

THIS WRIT WAS ISSUED BY WILLIAM ALEXANDER, of No. 5 Lombard Street, Belfast, whose registered place of business is No. 15 Wicklow Street, in the City of Dublin, Solicitor for the said Plaintiff, who resides at 29 Donegall Street in the County of the City of Belfast and is a Solr.

N.B. - This Writ is to be used where the Defendant or all the Defendants or one or more Defendant or Defendants is or are out of the Jurisdiction.

When the Defendant to be served is not a British subject, and is not in British dominion, notice of the Writ, and not the Writ itself, is to be served upon him.

THIS WRIT WAS SERVED BY ME on the Defendants by posting a true copy thereof to them in a prepaid registered envelope addressed to the Defendants at their registered office No. 1 Royal Exchange Avenue London E.C. at the General Post Office Belfast on the Defendant

on Fri day, the 26th day of May 1916.

INDORSED the 26th day of May 1916.

(Signed),

W. H. M. Brownlee,

Address, 5 Lombard St. Belfast.

(Seal)



1916.

No. 4746.

In the High Court of Justice in Ireland.

KING'S BENCH DIVISION.

THOMAS ERSKINE ALEXANDER

V.

THE BRITISH DOMINIONS GENERAL  
INSURANCE COMPANY LIMITED.

---

## WRIT OF SUMMONS.

for  
SERVICE OUT OF JURISDICTION.

---

WILLIAM ALEXANDER,

Plaintiff's Solicitor,

5 LOMBARD STREET,

BELFAST.



1916. No. 4746.

In the High Court of Justice in Ireland,  
King's Bench Division.

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Between,

Thomas Erskine Alexander,

Plaintiff,

and

The British Dominions General  
Insurance Co.

Defendants.

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ENTER AN APPEARANCE FOR the Defendants in this  
action without prejudice to Motion to remit.

Dated this 2nd day of June 1916.

George McIlldowie & Sons,

Solicitors for the Defendants.

The Registered place of business of the Defendant's Solicitor  
is at Number 22 Bachelors Walk in the City of Dublin.



1916. No. 4746.

In the High Court of Justice in Ireland,  
King's Bench Division.

-----

Between,

Thomas Erskine Alexander,

Plaintiff,

and

The British Dominions General  
Insurance Co.

Defendants.

-----

TAKE NOTICE that I have this day entered an  
appearance at the Record and Pleadings Office of the  
above Division, Four Courts, Dublin, for Defts to the  
Writ of Summons in this action without prejudice to  
Motion to remit.

Dated 2nd day of June 1916.

(Signed) George McIlldowie & Sons

of 22 Bachelors Walk

Solicitors for the Defendants.

To

Wm. Alexander Esq.,

Plffs Solr.

15 Wicklow St.



1916. No. 4746.  
In the High Court of Justice in Ireland,  
King's Bench Division.

Between,

Thomas Erskine Alexander,

Plaintiff,

and

The British Dominions General  
Insurance Company Limited.

Defendants.

STATEMENT of CLAIM

Delivered the 4th day of July 1916 by William Alexander of  
No. 15 Wicklow Street, Dublin, Solicitor for the Plaintiff.

1. By a Contract in writing made the 14th day of March 1916 between the Plaintiff and the Defendants the Defendants in consideration of the sum of £14.15.0 paid by the Plaintiff to the Defendants undertook and agreed to pay or make good to the Plaintiff all damage to or loss of the Plaintiff's Motor Vehicle and its tyres lamps and accessories by any accidental cause or malicious damage by third parties for the period commencing at noon on the 12th day of March 1916 and ending at noon on the 12th day of March 1917.

2. On the 24th day of April 1916 the said Motor Vehicle was damaged by another Motor car colliding with the said vehicle and on the said date another Motor car in passing the said vehicle on the road collided with the said vehicle causing further damage to the same.

3. In breach of the aforesaid Contract the Defendants have refused and still refuse to pay or make good to the Plaintiff the said damage to the said Motor vehicle or any of it.

4. In consequence the Plaintiff has suffered loss and



damage.

Particulars of damage to said vehicle.

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Repairing top back panel where damaged, opening & replacing upholstery.

Adjusting near side door setting hinges & new lace check strap.

Taking dents out of back of petrol tank.

Straightening 2 front mudguards.

Paint top back panel & quarters, 2 front & one hind mudguards, two front doors, scuttle dash, petrol tank, valances. Polishing glass frame & tool box.

Taking spout moulding of roof filling up cracks & covering with mole & whitelead, replacing mouldings etc.

Repairing bottom half of wind screen & tightening glass in same.

Straightening one hind mudguard.

Repairing front seat cushion & restuffing & new buttons & repairing trimming inside where required.

Taking brass angle plate of edge of footboards planing off same & replacing.

Pumicing down painting & varnishing remainder of Car.

Tyre burst.

The Plaintiff claims £50 damages.

T.W. BROWN.

Place of Trial: County of the City of Belfast.



Thomas Erskine Alexander

and

The British Dominions General  
Insur. Coy. Ltd.

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Copy

PLEADINGS.

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*Notice of Trial served for  
Dubai City Amigos.*

William Alexander,  
Solicitor,  
5 Lombard Street,  
Belfast.



1916. No. 4746.  
In the High Court of Justice in Ireland,  
King's Bench Division.

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Between,

Thomas Erskine Alexander,  
Plaintiff,  
and

The British Dominions General Insurance  
Company Limited.

Defendants.

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D E F E N D E

Delivered the 7th day of July 1916 by Messrs George McIlldowie  
& Sons, 22 Bachelors Walk, Solicitors for the Defendants.

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1. The Defendants do not admit the averments contained in  
paragraphs 1,2,3 and 4 of the Statement. /

2. The Defendants are an Insurance Company and agreed with  
the Plaintiff to pay or make good damage to or loss of the  
Plaintiff's Motor Car subject to the conditions contained in  
the said Contract.

3. The said Contract contained a condition that no claim  
shall attach thereto when the said claim arose owing to  
(inter alia) any other than private or professional use or  
from Invasion, Foreign Enemy, Riot, Civil Commotion or  
Military or Usurper Power. //

4.. On the 24th day of April 1916 a state of Rebellion or  
Civil Commotion and Usurped Power existed in Ireland and the  
injuries to the said Motor Vehicle and its tyres lamps and  
accessories were due to the said Rebellion Civil Commotion  
or Usurped Power.

5. In the alternative the injuries complained of did not



occur during the private or professional use of the said  
Motor Vehicle.

(Sgd) James Reid.



1916. No. 4746.

In the High Court of Justice in Ireland,  
King's Bench Division.

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Between,

Thomas Erskine Alexander,

Plaintiff,

and

The British Dominions General  
Insurance Company Limited.

Defendants.

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R E P L Y

Delivered the 11th day of July 1916, by William Alexander of  
No. 15 Wicklow Street, Dublin, Solicitor for the Plaintiff.

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The Plaintiff joins issue with the Defendants  
upon their Defence.

T.W. BROWN.