

Appeal Memo.

1. The judgment of the Court below is opposed to evidence and probabilities.
2. The burden of proof was improperly thrown upon the Plaintiff.
3. Finding of the lower court that the Plaintiff was bound to relay the damaged portion is contrary to law.
4. The lower court bases its judgment mainly on irrelevant opinions recorded months after the floods on work washed away by such floods.
5. The lower court has failed to consider the effects of the documents filed in the suit.

The lower is wrong in assuming anything from the Bill signed by the Plaintiff.

Very respectfully,
J. V. E.

Superintendent
of Fire

H. A.

5TH CIRCLE, MADRAS,

No. 1778

THE SUPERINTENDING ENGINEER,

5TH CIRCLE,

To

THE

THE Chief Engineer
P. W. D.

SIR,

Enclosures. /

SIR,
With reference to Col^l Burton's
letter No. 1256 of the 26th June 1885, I
have the honor to forward a copy
of the Appeal Plaint, filed by
Contractor Munesawmy Mudali
in the District Court at Chinnai
2nd District. The Government Pleader
has informed the Executive Engineer
that there is no need to have the Answer
to the Appeal previously drawn up, as
the Government Pleader has simply
to comment upon the grounds of
appeal at the time of hearing.

I have the honor to be

Fri
 Your Chas & Co. & Son
 London & West
 Coll. R. E.

Reprints & Engrs
to Birck

To

THE

Chief Engineer
P. W. D.

Recorded, with
reference to G.P.

N=1577W of 7-7-85

Dated 24th

Recd. 27

July

1885.

ENCLOSURES. 1

No 1782 W of 30th July 1885

No. 1778

Appeal plaint - Forwarded

copy of the - filed in the

District Court Chingleput

by Contractor Moorusawmy Naidu.

As

28.7.85.

W.

28.7.85

S. E. V. C. Wick