Alfred Roy vs. United Electric Railways, 1928–1932

A family-history write-up of the Roy family's trolley-crossing lawsuits in Kent County, Rhode Island

Compiled September 17, 2026 by Claude AI, edited by Patty Roy

The accident

On Tuesday, April 3, 1928, at 8:30 a.m., a truck carrying Alfred Roy of Lincoln Park, Warwick, and his sons was struck by a Providence–East Greenwich trolley car of the United Electric Railways Company at Post Road and Hospital-East Way in Hillsgrove. His sons Leo, Napoleon, Louis, and Eugene were in the truck. They were traveling south along Post Road toward Apponaug, on their way to the family farm.

The truck was being driven on the right side of the road close to or upon the railway track in this same position for some little way. The truck had passed the electric car and was traveling about 500 or 600 feet ahead of the electric trolley car. The truck was following a horse-drawn vehicle. Coming toward the truck from the opposite direction was a truck loaded with sand followed by aa automobile with Mr. and Mrs. Brown. The truck could not pass the horse-drawn vehicle and had to slow down.

Napoleon Roy saw the electric car coming towards the truck. It was travelling about thirty to thirty-five miles an hour. Napoleon, who was riding facing backwards, stood up and waved his hands to attract the attention of the motorman. The motorman was looking toward some workmen removing some trees where the “Elks Diner” has been built since the accident.

Napoleon could not attract the attention of the motorman and the electric car struck the right rear of the truck, driving the truck across the road and into the woods passing just in front of the Brown car. Napoleon was thrown out of the truck. The section of the road is described as straight and the motorman should have seen the truck. The motorman, a man with twenty-three years on the job, claimed the truck swerved onto the car track in front of the electric car and the motorman was looking straight ahead but did not have time to stop.

The newspaper describing the 1930 verdict calls it "his truck" and puts the collision at a grade crossing — the point where the trolley line crossed the highway at street level, with no bridge or gates. The Superior Court's own 1929 decision in Napoleon Roy's case describes the vehicle as "a truck partially owned by the plaintiff," so ownership within the family may have been shared.

The farm they were driving to was about fifty acres, worked with tools, tractors and the truck itself, and run as a partnership between Alfred and his three grown sons. It supplied a roadside stand as well. Each partner's share of the 1927 profits was put at $2,200, and Louis testified his share fell to $150 the following year. That collapse in income is what Alfred tried to put before the jury in 1930, and it is what the Supreme Court refused to let him recover.

He sued for $20,000 and the jury gave him $10,000. For scale, $10,000 in 1930 is very roughly $200,000 in present-day money using standard consumer-price conversions.

The family's lawsuits

The Roys did not bring one case — they brought a cluster of them, each tried separately, and by October 1930 four Kent County juries had already found for a member of the family.

Plaintiff	Born (age on Apr 3, 1928)	Kent County docket	Jury Verdict	On appeal	What the records show
Napoleon C. Roy	May 8, 1902 (25)	Law 2068	$4,415	Affirmed in full	Tried April 1929; new-trial motion denied May 1929; affirmed by the Supreme Court No. 6739, Jan 29, 1930
Eugene Roy	Jun 27, 1909 (18)	Law 2063	$6,500	No Appeal found	Docketed "p. a." in 1930 — he sued through a next friend because he was still under twenty-one. Next friend means an adult represented Eugene.
Louis A. Roy	Aug 14, 1904 (23)	Law 2064	$3,000	Cut to $1,500 or a new trial	Testified he could not work at all in 1928 because of a knee injury; Supreme Court No. 6901, Feb. 4, 1931, his case was back on the calendar Apr 5, 1932

Plaintiff	Born (age on Apr 3, 1928)	Kent County docket	Jury Verdict	On appeal	What the records show
Leo Roy	Jun 16, 1900 (27)	Law 2066	$5,000	Cut to $2,000 or a new trial	Tried March 1930, Supreme Court No. 7002, Dec. 9, 1931
Alfred Roy	father	Law 2065	$10,000	New trial ordered	Verdict set aside Apr 1, 1932, Supreme Court no. 6933
Alfred Roy	father	Law 2407	not shown		Set for jury trial Feb 25, 1932
Alfred Roy et als.	father	Law 2420	not shown		Set for trial Feb 25, 1932 and again Apr 5, 1932

Juries awarded the family $28,915 in all. After the appeals the sums that stood were Napoleon's $4,415 and Eugene's $6,500 in full, Louis at $1,500 and Leo at $2,000 if they accepted the reductions, and nothing yet settled for Alfred — about $14,415 of the original $28,915, plus whatever his retried case eventually produced. The trolley company won something on every appeal it took except the first.

Two loose ends remain in that table. First, the Supreme Court and the newspapers consistently say Alfred had **three** sons injured, but the dockets name four other Roy plaintiffs — Napoleon, Eugene, Louis and Leo. The 1930 decision in Napoleon's case states that "plaintiff, his three brothers, and their father, were en route southerly on their auto truck to a farm jointly operated by them" — five Roys aboard, four of them sons. The "three sons" of the 1932 opinion counts something narrower: the farm was "operated as a partnership by him and his three sons," and Eugene, eighteen and a minor, was not one of the partners. The newspaper's reference to three sons whose suits had been disposed of matches the three appeals the Supreme Court had decided by then, Napoleon's, Louis's and Leo's. Second, the higher docket numbers, 2407 and 2420, belong to cases filed later than the 1928 batch, so Alfred was pursuing at least two more claims against the company in 1932 beyond the one that went up on appeal. What those claims were — damage to the truck, or claims brought on behalf of others, which is what "et als." implies — the newspapers do not say.

What happened to Leo's case

Leo's case did come to trial, and he won the second-largest verdict in the family: $5,000.

He was tried in Kent County before Judge Carpenter, like his father and Napoleon, and the verdict came after October 1930 — which is why the newspaper counting Alfred's award as the family's fourth did not mention him. The company appealed, and on December 9, 1931 the Supreme Court cut the award hard. The decision is unusually candid about why.

- **His visible injuries were slight.** The medical testimony described "a small swelling about half the size of an English walnut on the back of his head" and a cut finger on his left hand, both of which healed with treatment.
- **His larger claims went unsupported.** He said the finger was permanently damaged and that he suffered nervous disorders from the crash; no doctor backed either. Leo wept on the witness stand, and Judge Carpenter wrote that he was "suffering from a shattered nervous system." The Supreme Court answered that weeping in the witness box was not enough to justify that finding.
- **His lost farm income was disallowed.** The same partnership-profits reasoning that would later sink his father's verdict was applied to him, so the trial judge was "not supported" in saying the jury could find Leo lost about $3,000.
- **The result was a remittitur.** The court gave him until December 19, 1931 to file a paper accepting $2,000 instead of $5,000. If he refused, he got a new trial.

Two smaller points from the same decision. Judge Carpenter had told Leo's jury, "this is his last day in court" — language the Supreme Court called erroneous on its own, though cured by what he said next. And Leo appeared again as a witness in his father's trial, where the judge's remarks during his testimony became another of the company's exceptions. What is still unknown is whether Leo signed for the $2,000 or took his chances on a new trial, and that is in the Kent County docket book for Law 2066.

What Eugene's age meant for the cases

Eugene was the only minor among them, and under the law of the time that single fact turned his injury into two separate lawsuits rather than one — his own, and his father's.

On the day of the crash Leo was 27, Napoleon 25, Louis 23 and Eugene 18. Eugene came of age on June 27, 1930, a few months before his father's trial. Three consequences follow, and they tie several loose threads together.

It confirms the reading of the docket. A minor could not sue in his own name; he sued through a next friend, normally his father. That is what the "p. a." beside Eugene's name on the 1930 docket means. A parent would bring a separate action of their own.

It gave Alfred a claim of his own arising out of Eugene's injury. At common law a father was entitled to the labor and earnings of a minor child living at home, and was responsible for the child's doctors' bills. So when a minor was hurt, the child recovered for his own pain, permanent injury and lost earning power after twenty-one, while the father separately recovered the medical expenses and the value of the son's lost services during the remainder of his minority. The Rhode Island Supreme Court had put the rule plainly decades earlier: "at the common law the father is entitled to the benefit of his minor children's labor while they live with him and are supported by him."

That may be the answer to a question raised earlier in this document. Two later Alfred Roy cases sit on the 1932 calendars at Law 2407 and Law 2420, the second captioned "et als." Both carry docket numbers well above the 1928 batch, meaning they were filed afterward. A father's action for a minor

son's medical bills and lost services is exactly the sort of claim that would be brought separately and later.

It explains who was in the farm partnership. The 1932 opinion states that the farm was "operated as a partnership by him and his three sons," that "all four of them were more or less injured," and that each of the four sued for the same lost profits. Four sons were in the truck, so the partner who is missing from that list is Eugene — and his absence is exactly what the law would predict. A father was entitled to a minor son's labor, so there was nothing to pay Eugene a partner's share for. It also sharpens the court's reasoning: when it said farm profits depend on the work of more than one person, the Roy farm was an unusually clean illustration, since the drop in takings reflected five men's missing labor and four of them were separately suing over it.

Eugene, the youngest and the only minor, drew the largest verdict of any of the sons at $6,500, and no appeal of it has turned up — while every one of his adult brothers' awards was appealed and two were cut roughly in half. He is very likely the only Roy who kept what a jury gave him in full, apart from Napoleon. Two things may explain it: his injuries were probably the most serious, and as a minor and a non-partner his claim carried none of the farm-profits evidence that sank the others.

The 1930 trial and the $10,000 verdict

Alfred's case was tried in Kent County Superior Court at East Greenwich before Judge Herbert L. Carpenter, and on the evening of Friday, October 3, 1930 the jury came back for him.

The court-record column and the news story differ slightly on one detail. The record column says the jury deliberated "three hours and 50 minutes"; the news story rounds it to "four hours." Both report the same $10,000 verdict against a $20,000 claim.

The lawyers were:

- **For Alfred Roy:** Patrick H. Quinn and Michael De Ciantis, of Quinn, Kernan & Quinn. Quinn was addressed in the press as "Col. Patrick H. Quinn."
- **For United Electric Railways:** Earl A. Sweeney, who tried the case, with Clifford Whipple appearing with him on the appeal.

The company immediately moved for a new trial. That motion was heard before Judge Carpenter on Wednesday, November 5, 1930, and he reserved decision rather than ruling from the bench. He denied a new trial afterward, and that denial became one of the grounds the company carried to the Supreme Court.

Why the verdict was thrown out

On Friday, April 1, 1932 the Rhode Island Supreme Court set the $10,000 verdict aside on two separate grounds, either of which would have been enough on its own. The decision is reported as *Roy v. United Electric Railways Co.*, 52 R.I. 173, 159 A. 637.

Ground one: the farm profits were not recoverable. Alfred had been allowed to show the jury how much less the farm and roadside stand earned after the accident. The court held that was the wrong measure. A personal injury plaintiff can recover what he could have earned by his own labor, but not the

profits of a business, because farm profits swing with weather, prices and the work of other people, and none of that is traceable to one man's injury. Admitting that evidence was error.

The rule did not arrive out of nowhere. It was built up across the family's own cases. In Napoleon's appeal the court let the verdict stand because the farm-profit evidence plainly had not inflated it. In Louis's appeal it said the shrinkage in profits did not follow from the accident, since "decreased profits from farming may be due to many causes, such as unfavorable weather conditions and glutted markets," and since hired labor could have replaced his. In Leo's appeal it repeated the disapproval. By the time Alfred's case arrived, the court had run out of patience: it noted that Judge Carpenter had "at different times in the course of the trial made assertions to the contrary" about what the earlier decision held, and spelled out the distinction between earnings, which are recoverable, and profits, which are not. Its clinching point was that all four partners had been hurt and each was suing for the same lost profits, so "it would be impossible to determine how much the personal efforts of each contributed to the profits or how much the loss of the services of any one contributed to the loss."

Judge Carpenter had stated during the direct examination of Leo Roy that the loss of profits on the farm constituted a part of the damages which the plaintiff Alfred Roy was entitled to recover. Later to be found that this remark could have influenced the jury.

A second, smaller evidence ruling went the same way. Alfred had put in testimony about a septic condition on his neck, diagnosed as a carbuncle, that appeared eight months after the crash. With no evidence connecting it to the accident, that too was held inadmissible.

Ground two: the trial judge's conduct. This is the part the newspaper led with, and it is unusual. While Earl A. Sweeney was cross-examining Louis Roy about testimony Louis had given in his own case, Judge Carpenter shut the questioning down — even though, as the Supreme Court said flatly, "this was a proper question to ask on cross-examination" — and then said this in front of the jury:

> *The Court has a right to talk. You are not the whole show in this case.*
>
> *Is there anything funny about it? You can see that your witnesses keep their faces smooth or I will excuse them. I have stood about all I can... Other members of this court as well as myself have stood your petulance shown in these cases as long as we can and I will not stand it any longer.*
>
> *I don't want to tell you again to go on and try your case if you are going to, and if I have to, the United Electric Railways Company will have another counsel to try their cases.*

The quarrel had a concrete cause, which the newspaper left out. Alfred had introduced the farm's account book. The company then showed that checks for sizeable amounts of green corn sold to one firm never appeared in it. Louis was called in rebuttal to explain, and said the book recorded only corn the family grew: some of each order had been bought in from other farmers at no profit, and — he added — he had driven the truck himself to collect it. That was the opening Sweeney went for, because in his own trial Louis had sworn that a knee injury left him unable to do any work at all in 1928. Hence the question, and hence the judge shutting it down.

The Supreme Court applied a settled rule: not every unguarded remark from the bench requires reversal, but it is reversible error for a judge to censure a lawyer for supposed misconduct in *other*

cases, to make remarks that disparage him in the jury's eyes without justification, or to take a visibly hostile attitude toward one side's counsel. A lawyer is an officer of the court and is entitled to treatment that does not damage his client.

The justices then went out of their way to say they could not work out what had provoked the judge. Sweeney, they found, was acting within his rights, doing his duty to his client, and "maintaining a very respectful demeanor toward the court"; and Alfred's own lawyers were "eminently capable of protecting his client's interests," so there had been no need for the judge to step in at all. Keeping order was the judge's duty, but so was letting the case be tried "without making unnecessary and prejudicial remarks and interruptions."

The court also said something the newspaper did not print, and it is not flattering to the family. Explaining why laughter in the courtroom was no reason to censure Sweeney, the justices wrote that the witness "was plainly embarrassed by the conflict between his attempted explanation and his testimony, given in his own case," and that Sweeney had been "attempting to discredit the witness and prevent what counsel evidently believed an attempt to perpetrate a fraud on the court and jury." That is as close as an appellate court comes to saying a witness had been caught out.

The conclusion was blunt: it was "highly probable that the jury was prejudiced by reason of the court's attitude toward defendant's counsel," and, quite apart from the evidence rulings, "the conduct of the trial justice was such that the defendant did not receive a fair trial." The case was remitted to the Superior Court for a new trial. The decision was *per curiam* — issued by the court as a whole, with no single justice signing it — from a panel of Chief Justice Stearns and Justices Rathbun, Sweeney, Murdock and Hahn.

Two pieces of context the newspaper did not carry. This was the fourth time the Supreme Court had dealt with this one collision, and the friction had been visible from the start: in Napoleon's appeal, two years earlier, the same court had written that "considerable feeling exists between the parties and that other litigation is in prospect," and had gone out of its way to disapprove of the way Alfred's own lawyers cross-examined the company's investigators, calling it close to "an attempt to create prejudice against defendant company." Judge Carpenter's complaint about "your petulance shown in these cases" was likewise about a run of cases rather than this one — he had by then presided over Napoleon's trial, Alfred's, and Leo's. None of that excused what he said, which is precisely the court's point: the rule he broke forbids censuring a lawyer for conduct in other cases.

What happened after the reversal

Four days after the Supreme Court ruled, Roy cases were back on the Kent County trial calendar — but not, on the face of it, the one that had just been reversed.

The calendar printed for April 5, 1932, before Judge Frost, lists Law 2420, *Alfred Roy et als. vs. United Electric Railways Company*, and Law 2064, *Louis A. Roy vs. United Electric Railways Company*. Law 2065, the number Alfred's personal injury case carried on the 1930 docket, does not appear. A remanded case keeps its original docket number, so this calendar shows the family's litigation still running in April 1932, but it does not show the retrial of the reversed case.

Louis's reappearance at Law 2064 is itself informative. His verdict had been cut to $1,500 in February 1931 on condition he filed a remittitur, and if he refused that reduction the alternative the court gave him was a new trial. A case back before a judge in April 1932, more than a year after the decision, fits a plaintiff who declined the money and took the retrial.

After that, the trail in the newspaper ends. Searching the published Rhode Island court reports, and the result is a clean negative:

- There is **no** later reported decision in Alfred Roy's case. The April 1, 1932 opinion at 52 R.I. 173 is the last one.
- Volume 54 R.I., covering late 1933 into 1934, contains no Roy case against the company at all.

What that means in practice: whatever happened to Alfred's case after April 1932, it never reached the Supreme Court again. A case is only published when it is appealed, so a second trial — or a settlement on the courthouse steps — would leave no trace in the law reports. One inference is worth drawing, though. In both Louis's and Leo's cases the Supreme Court offered a reduced figure as an alternative to retrial, because the only thing wrong was the size of the award. In Alfred's it did not: the judge's conduct had tainted the whole trial, so there was no number to offer and the case had to be tried over. Stripped of the farm profits and the carbuncle, a second jury would have been working with much less, and the company knew it. That is the shape of a case that settles.

Alfred Roy was *entitled* to a new trial, and the case was formally sent back to Kent County to get one — but no surviving newspaper articles or published court record shows that the retrial was ever held, and the paper trail goes quiet after April 5, 1932.

Three things to consider:

1. **The trial that was thrown out was held in October 1930.** The $10,000 verdict came on October 3, 1930. April 1, 1932 is the date the Rhode Island Supreme Court *reversed* it, a year and a half later. That gap is normal for an appeal of that era.
2. **The Supreme Court did order a new trial.** Its closing line was: "The case is remitted to the Superior Court for a new trial." So the case was legally alive and back on the Kent County docket as of April 1932.
3. **No further decision in Alfred's case was ever published.** Rhode Island's official reports carry the 1932 reversal at 52 R.I. 173, and nothing after it. Volumes covering 1932 through 1934 contain no follow-up appeal by either side.

That last point is the most useful clue, and it cuts two ways. The company appealed every substantial verdict in this family except Eugene's, so its silence after April 1932 is unlikely to mean it simply gave up Only *appealed* cases get published, so silence in the law reports means no one appealed again. The two ordinary explanations are that a second jury trial was held and both sides accepted the result, or that the trolley company settled rather than try it a third time. There is a practical reason to suspect settlement: the Supreme Court's ruling had also stripped out Alfred's biggest damages claim — his lost farm and roadside-stand profits — so a second verdict was almost certainly going to be much smaller than $10,000, and both sides knew it. The court had already cut Louis from $3,000 to $1,500 and Leo from $5,000 to $2,000 on the same reasoning.

The reversal was not a finding that Alfred had no case, and it says nothing bad about him. Five juries found the trolley company at fault and no appeal ever disturbed that. What the appeals took away was money, not blame — the court held twice over that a farm partnership's shrinking profits could not be laid at the motorman's door, and it set Alfred's verdict aside because of how the judge treated the other side's lawyer.

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