



IN THE CIRCUIT COURT OF DALLAS COUNTY, ALABAMA

RAIL CONNECTION, INC.,

Plaintiff,

v.

**WILLIAM H. HUFFMAN, III
SUSAN O'NEIL HUFFMAN, and
ALABAMA AG CREDIT, FLCA
Defendants.**

CIVIL ACTION NO. CV-2024-900137

**WILLIAM H. HUFFMAN, III,
individually and derivatively on
behalf of AMERICAN RAILWAY
SERVICES, LLC; WILLIAM H.
HUFFMAN, III, individually and
derivatively on behalf of WHEEL
WORX NORTH, LLC; WILLIAM H.
HUFFMAN, III, individually and
derivatively on behalf of RANGER
BEARINGS, LLC;**

Counterclaim Plaintiffs,

v.

**HAINES A. O'NEIL,
RAIL CONNECTION, INC
AMERICAN RAILWAY SERVICES,
LLC; WHEEL WORX NORTH, LLC;
RANGER BEARINGS, LLC;
FICTITIOUS DEFENDANTS A-J,**

Counterclaim Defendants.

**WILLIE A. PALMER JR
Intervenor Plaintiff**

ANSWER FOR DEFENDANT WILLIAM H. HUFFMAN

COMES NOW Defendant William H. Huffman, III (“Defendant” or “Huffman”), and files his answer to Intervenor Plaintiff Willie A. Palmer, Jr.’s Amended Complaint. In response thereto, Huffman states as follows:

Huffman denies all allegations contained in any and all paragraphs set forth in Palmers’ Complaint and supplements thereto (docs. 60, 70, 124, and 186) and demands strict proof thereof. Huffman claims ownership of the real property conveyed through deed Book 1607, Page Nos. 774-775 in the Probate Court of Dallas County dated September 8, 2020, and Deed Book 1609 Pages 538–39.

JURY DEMAND

Huffman hereby demands a trial by jury on all issues so triable.

AFFIRMATIVE DEFENSES

Huffman reserves the right to modify and/or expand these defenses and to take further positions and raise additional defenses as discovery proceeds in this case. Huffman, without assuming any burden of pleadings, proof, or persuasion resting on Palmer, asserts the following affirmative defenses:

1. To the extent not expressly admitted, Huffman denies the material allegations of Palmer’s Complaint and supplements thereto and demands strict proof thereof.
2. Palmer fails to state a claim upon which relief may be granted.
3. The allegations contained Palmer’s Complaint are untrue.
4. Palmer’s claims are barred by the statute of limitations, doctrine of repose, consent, and/or ratification.
5. Palmer has not met the statutory requirements for quiet title action.

6. Palmer's Complaint is barred in whole or in part by the doctrine of estoppel.
7. Palmer's Complaint is barred in whole or in part by the doctrine of laches.
8. Palmer's Complaint is barred in whole or in part by the doctrine of waiver.
9. Huffman denies that Palmer has suffered any damages. To the extent that Palmer has suffered damages, such damages were caused by acts, events, or omissions outside of Huffman's control and for which Huffman is not legally liable.
10. Huffman denies that Palmer is entitled to the recovery of the nature, type and/or amount he seeks.
11. Palmer failed to mitigate his damages, if any.
12. Palmer's Amended Complaint, and supplements thereto, is barred by the doctrine of unclean hands.
13. Palmer's Amended Complaint, and supplements thereto, is barred by the statute of frauds and/or the parol evidence rule.
14. Huffman contests the nature of damages claimed by Palmer.
15. Huffman adopts and incorporates all available affirmative defenses listed in Ala. R. Civ. P. 8.
16. Any claim for punitive damages by Palmer is limited in whole or in part pursuant to the United States Constitution, the Constitution of Alabama, and applicable case and common law.
17. At the time of filing this Answer, Huffman has not completed discovery in this case. If the information obtained during discovery warrants the assertions of any additional defense in this action, Huffman reserves the right to amend this Answer to assert additional affirmative defenses.

Respectfully submitted,

/s/ Yawanna N. McDonald

Andrew P. Campbell (CAM006)

Yawanna M. McDonald (MCD074)

Attorneys for Defendant William Huffman

OF COUNSEL:

CAMPBELL PARTNERS, LLC

505 N. 20th Street

Suite 1600

Birmingham, Alabama 35203

Telephone: (205) 224-0750

E-Mail: andy@campbellpartnerslaw.com
yawanna@campbellpartnerslaw.com

/s/ J. Mark White

J. Mark White (WHI001)

Attorneys for Defendant William Huffman

OF COUNSEL:

WHITE ARNOLD & DOWD P.C.

2001 Park Place, Suite 1400

Birmingham, AL 35203

Telephone (205) 323-1888

Facsimile: (205) 323-8907

Email: mwhite@whitearnolddowd.com

/s/ William J. Gamble

William J. Gamble

Attorney for Defendant William Huffman

OF COUNSEL:

GAMBLE, GAMBLE, CALAME & JONES, LLC

Post Office Box 345

Selma, Alabama 36702-0345

Telephone: (334) 875-7810

Email: wjg@gamblelaw.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served this day the 1st December 2025, via Alafile, which will electronically serve all counsel of record and a copy to *pro se* parties will be mailed.

/s/ Yawanna N. McDonald

OF COUNSEL