

SUMMONS AND COMPLAINT.

STATE OF ALABAMA.)
BALDWIN COUNTY.)

IN THE CIRCUIT COURT-AT LAW.

TO ANY SHERIFF OF THE STATE OF ALABAMA:-

You are hereby commanded to summon Mollie Bryars and Paul Bryars to appear at the Circuit Court to be held for said county and state, at the place of holding the same, within thirty days from the service hereof, then and there to answer the complaint of Ben Franklin, suing as the administrator of the estate of Mary Franklin, deceased.

Witness my hand, this the 22 day of May, A. D., 1919.

T. W. Riccison CLERK.

COMPLAINT.

BEN FRANKLIN, suing as the Ad-)	-v-	{	MOLLIE BRYARS AND PAUL
ministrator of the estate of)			BRYARS.
Mary Franklin, deceased.)			
Plaintiff.)			Defendants.

FIRST.

The Plaintiff, suing as the Administrator of the estate of Mary Franklin, deceased, claims of the defendants the sum of Ten Thousand Dollars (\$10,000.00) as damages, and avers that heretofore, to-wit; on the 20th day of July, 1918, his intestate, who was a minor under the age of seven years, was lawfully on the public road at or near Pine Log, Baldwin County, Alabama, and the defendant, Paul Bryars, was then and there operating an automobile upon and over the said public road and was then and there acting as the agent of the said defendant, Mollie Bryars, and acting within the line and scope of his authority, which said automobile was the property of and owned by the said Mollie Bryars, and the Plaintiff avers that the said Paul Bryars so negligently conducted himself in and about the operation of the said automobile on the said date that the said automobile was caused to run against said plaintiffs intestate and kill her, to the damage of the plaintiff aforesaid, hence this suit.

Stones Stone
Page & Moore
Attorneys for Plaintiff.

Plaintiff demands a trial by jury of this cause.

Stones Stone
Page & Moore
Attorneys for Plaintiff.

SUMMONS AND COMPLAINT

Ben Franklin, suing as the
administrator of the estate
of Mary Franklin, deceased.
Plaintiff.

~~VS.~~
Mollie Bryers and Paul Bry-
ers,
Defendants.

CIRCUIT COURT-LAW SIDE,
STATE OF ALABAMA,
HALEWEN COUNTY.

Filed in this office this the
22 day of May, 1919.

McCurran
Clerk.

STONE & STONE
ATTORNEYS
BAY MINETTE, ALABAMA

*Leave copy on Mollie Bryers
and Paul Bryers*

*8th day of Aug 1919
by leaving a copy
of the within
with Paul Bryers
and one with
Mollie Bryers
W.R. Stewart
Sheriff*

LAW OFFICES
OF
STONE & STONE

BEN FRANKLIN, AS ADMINISTRATOR,

PLAINTIFF

V.

MOLLIE BRYARS, ET AL.,

DEFENDANTS.)

Now come the defendants and demurs to the complaint on each of the following grounds, viz:

1. It is not alleged that the injuries complained of were the proximate result of defendants said negligence.

2. There is a misjoinder of parties defendant.

The defendant Mollie Bryars further demurs to the complaint for that it is not shown wherein she is liable for Paul Bryars' negligent conduct of himself.

Ernest C. Cullen
Attorneys for defendants.

CIVIL SUBPOENA.

In case the witness shall wish to charge for attendance he will please produce to the clerk in term this copy of his Subpoena, or within five days after adjournment of court, else he will be barred.

The State of Alabama, }

BALDWIN COUNTY. }

TO ANY SHERIFF OF THE STATE OF ALABAMA—GREETING:

YOU ARE HEREBY COMMANDED TO SUMMON

Mrs Paul Bryars

Miss Lucie Mc Gowan

Mrs Guy Mc Gowan

if to be found in your county, at the instance of the

Deft

to appear before the honorable Circuit Court of Baldwin County at the Court House thereof, on the

18th

day of *Nov* 18*99*

, then and there to testify, and the truth to say, in a certain case pend-

ing, wherein

Ben Franklin

Plaintiff,

Mrs Paul Bryars

Defendant,

and there remain during said Court until discharged by due course of law.

Herein fail not, and have you then and there this Writ .

Witness my hand this *11* day of

Nov

A. D., 19*99*

ATTEST:

J. W. Shivers

Clerk.

CIVIL SUBPOENA.

In case the witness shall wish to charge for attendance he will please produce to the clerk in term this copy of his Subpoena, or within five days after adjournment of court, else he will be barred.

The State of Alabama, }
BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA—GREETING:

YOU ARE HEREBY COMMANDED TO SUMMON

Shaddie Hudson.

Minnie Bennett. Minnie Bennett.

Kizzie Franklin

if to be found in your county, at the instance of the

Reft

to appear before the honorable Circuit Court of Baldwin County at the Court House thereof, on the *18*

day of *Nov* 18....., then and there to testify, and the truth to say, in a certain case pend-

ing, wherein

Bur Franklin

Plaintiff,

Mollie & Paul Byars.

Defendant,

and there remain during said Court until discharged by due course of law.

Herein fail not, and have you then and there this Writ .

Witness my hand this *7* day of *Nov* A. D., 19*17*

ATTEST:

D. V. [Signature]

Clerk.

Executed Nov
13th 1919 by
leaving copy
of the within
summons with

Kizzie Franklin
Minnie Bennett
Primus Bennett

W. Street
Sheriff

By B. A. McGee B.

Original

No.

The State of Alabama,
BALDWIN COUNTY.

Ben Franklin

VS. | SUBPOENA FOR

Mollie & Mel Bryan

Circuit Court

WITNESSES

Shaddie Hudson
Minnie Bennett
Primus Bennett
Kizzie Franklin

Prison

SET FOR TRIAL

18th day of Nov 1919

Baldwin Times Print.

E

CIVIL SUBPOENA.

In case the witness shall wish to charge for attendance he will please produce to the clerk in term this copy of his Subpoena, or within five days after adjournment of court, else he will be barred.

The State of Alabama, }
BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA—GREETING:

YOU ARE HEREBY COMMANDED TO SUMMON

Shadellie Harrison

if to be found in your county, at the instance of the *Pepp*
to appear before the honorable Circuit Court of Baldwin County at the Court House thereof, on the *18th*
day of *Nov* *18/19*, then and there to testify, and the truth to say, in a certain case pending, wherein

Ben Franklin

Plaintiff,

Emilie & Paul Bugarn

Defendant,

and there remain during said Court until discharged by due course of law.

Herein fail not, and have you then and there this Writ .

Witness my hand this *7* day of *Nov* A. D., 19*19*.

ATTEST:

W. R. Rieun

Clerk.

Copy

No.

The State of Alabama,
BALDWIN COUNTY.

Ben Franklin

VS.

SUBPOENA FOR

Mollie & Paul Bryan

Circuit Court

WITNESSES

Maddie Hudson

SET FOR TRIAL

18 day of *Nov* 19*18*

Baldwin Times Print.