

No. 111

CIRCUIT COURT

Term, 193

You are hereby commanded, That of the goods and chattels, lands and tenements of
A. M. Lane Plaintiff in the suit,
 you cause to be made the sum of _____ Dollars,
 costs of suit, created by said Plaintiff _____, for that, whereas, on the 15 day of
April 1936, the said Plaintiff recovered by the Judgment of the said Circuit Court
 of said County, against *W. J. Phillips* Defendant
 to the suit, the sum of _____ Dollars,
 besides _____ Dollars, cost of suit;
 upon which Judgment an Execution has been issued and returned by the Sheriff, "No Property Found."

Clerk of said Court, and make return of this Writ and the execution thereof, according to law.

Witness my hand, this _____ day of _____ 193_____

..Clerk.

[illegible]

Term, 1935

Clerk.

[illegible]

STATE OF ALABAMA }
BALDWIN COUNTY. }

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons W. V. PHILLIPS to appear within thirty (30) days from the service of this writ in the Circuit Court, to be held in said County at the place of holding same, then and there to answer the Complaint of N. W. DEAN.

Witness my hand this the 15 day of December, 1934.

M. G. Stone
Clerk.

N. W. DEAN,
Plaintiff,
VS.
W. V. PHILLIPS,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW.

ONE:

The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS, as damages, for that on, to-wit, the 28th day of November, 1934, the Plaintiff, while being carried as a passenger along the Bay Minette-Stockton-Tensaw public road, at a point about one-half mile North of the Stockton Post Office, in Baldwin County, Alabama, in an automobile owned by the Defendant, and which was then and there being operated or driven by Jack Phillips, an agent or employee of the Defendant, who was then and there acting within the line and scope of his employment, was injured by said automobile as follows, to-wit:

His right arm broken in two places, his right hand broken, mangled and crushed, his hip crushed, his rib broken, and his body otherwise mangled and/or bruised; that he was caused to suffer great physical pain and mental anguish, and to doctor and hospital bills, and other expenses.

Plaintiff avers that his injuries were proximately caused by the negligence of the said Jack Phillips, the Agent or employee of the Defendant while acting in the line and scope of his employment in and about the management and operation of said automobile.

TWO:

The Plaintiff claims of the Defendant the further sum of TEN THOUSAND (\$10,000.00) DOLLARS damages, for that on, to-wit, November 28th, 1934, the Defendant, acting by and through Jack Phillips, his agent or employee, who was then and there acting within the line and scope of his employment, so negligently operated an automobile which belonged to the Defendant, and which he was then and there driving or running along the public road leading from Bay Minette to Tensaw, in Baldwin County, Alabama, at a point about one-half mile North of the Stockton Post Office, and in which automobile the Plaintiff was riding as a passenger, that he caused or allowed the said automobile which he was then and there driving as aforesaid to collide with another automobile driven by one T. J. Aplin and as a proximate result the Plaintiff was injured as follows:

His right arm broken in two places, his right hand broken, mangled and crushed, his hip crushed, his rib broken, and his body otherwise mangled and/or bruised; that he was caused to suffer great physical pain and mental anguish, and to incur doctor and hospital bills, and other expenses.

Plaintiff avers that the said injuries received by him were proximately caused by the negligence of the said Jack Phillips, who was then and there the agent or employee of the Defendant and acting within the line and scope of his employment in and about the management and operation of said automobile.

THREE:

Plaintiff claims of the Defendant the further and additional sum of TEN THOUSAND (\$10,000.00) DOLLARS, for that on, to-wit, November 28th, 1934, the Defendant acting by and through

Jack Phillips, his agent or employee acting within the line and scope of his employment, was operating an automobile along the Stockton-Tensaw public road, in Baldwin County, Alabama, at a place about one-half mile North of the Stockton Post Office, and in which automobile the Plaintiff was riding as a guest of the Defendant; that the said automobile at said time and place was so negligently operated that it was caused or allowed by the said Jack Phillips to collide with an automobile driven by one T. J. Aplin, and the Plaintiff was injured as follows:

His right arm broken in two places, his right hand broken, mangled and crushed, his hip crushed, his rib broken, and his body otherwise mangled, and/or bruised; that he was caused to suffer great physical pain and mental anguish, and to incur doctor and hospital bills, and other expenses.

Plaintiff avers that the said injuries received by him were proximately caused by the negligence of the said Jack Phillips, who was then and there acting in the line and scope of his employment in and about the management of said automobile which he was driving or operating.

FOUR:

The Plaintiff claims of the Defendant the further and additional sum of TEN THOUSAND (\$10,000.00) DOLLARS, for that on, to-wit, November 28th, 1954, the Defendant acting by and through Jack Phillips, his agent or employee who was then and there acting within the line and scope of his employment so negligently operated an automobile which he was then and there driving or running along the public road leading from Bay Minette to Tensaw, in Baldwin County, Alabama, at a point of said road about one-half mile North of the Stockton Post Office and in which automobile the Plaintiff was riding as a passenger, that he caused or allowed the said automobile which he was then driving or running to run into or collide with an automobile driven by one T. J.

Aplin, and the Plaintiff was injure as follows:

His right arm broken in two places, his right hand broken, mangled and crushed, his hip crushed, his rib broken, and his body otherwise mangled and/or bruised; that he was caused to suffer great physical pain and mental anguish, and to incur doctor and hospital bills, and other expenses.

Plaintiff avers that the said injuries received by him were proximately caused by the negligence of the Defendant, acting by and through his agent, Jack Phillips, who was then and there acting within the line and scope of his employment in and about the management and operation of said automobile.

Beebe & Stace
Attorneys for Plaintiff.

Plaintiff demands a trial by Jury.

Beebe & Stace
Attorneys for Plaintiff.

Dec 10
~~RECORDED~~ 129293
no 111

Executed Jan 5 1935
by serving copy of within Summons and
Complaint on

W O Phillips

W R Hunt Sheriff
By F V Harrell Deputy Sheriff

N. W. DEAN,
Plaintiff,

VS.

W. V. PHILLIPS,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW.

SUMMONS AND COMPLAINT.

Filed this the 15 day of
Jan, 1934.

My A. Stone
Clerk.