

185

IDA M. TURNBULL,
Plaintiff,
vs.
C. W. LYNN,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

And now comes the plaintiff and demurs to Pleas 2 and 3 filed by the defendant, separately and severally, and for grounds thereof says:

FIRST: That said plea alleges no facts which constitute a defense to the plaintiff's cause of action.

SECOND: That said plea does not set out how or in what manner the plaintiff was guilty of any negligence.

THIRD: That said plea neither traverses nor confesses and avoids the claim of the plaintiff.

FOURTH: That said plea does not allege how or in what manner the defendant was damaged.

FIFTH: That said plea presents no facts germane to the issue.

SIXTH: For aught that appears in said plea the negligence of the defendant was the proximate cause of the injuries complained of.

Beeler & Hall

Attorneys for Plaintiff.

185 RECORDED
Duck

IDA M. TURNBULL,
Plaintiff,

vs.

C. W. LYNN,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

DEMURRER.

Filed January 23, 1936.

Robert L. Duck
Clerk.

IDA M. TURNBULL,
Plaintiff,
-vs-
C. W. LYNN,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

AFFIDAVIT AND MOTION

STATE OF ALABAMA
BALDWIN COUNTY

Lloyd A. Magney, being first duly sworn, on his oath deposes and says:

That he is attorney of record for the defendant in the above entitled cause; that C. W. Lynn, the said defendant, Mrs. Fern Kenyon Lynn and Miss Margaret Samms are each and all material witnesses for the defendant in said cause; that each of said witnesses is a non-resident of the State of Alabama, residing in Orlando in the State of Florida, and that it is necessary to take the testimony of such witnesses by deposition.

That Honorable Joe Akerman, whose address is Orlando, Florida, is a suitable and qualified person to act as commissioner for the purpose of taking the depositions of such witnesses and affiant suggests the name of said Honorable Joe Akerman as such commissioner.

WHEREFORE, defendant moves that the Clerk of this Court will issue commission to the said Honorable Joe Akerman to take the depositions of said witnesses on the interrogatories filed herewith.

Lloyd A. Magney

Subscribed in my presence and sworn to before me this 5 day of March, 1936.

Robert S. Dush
Notary Public *Chief*

185 RECORDED

7-431

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

Motion
57

IDA M. TURNBULL ,
Plaintiff,

-vs-

C. W. LYNN,
Defendant.

AFFIDAVIT AND MOTION

Filed this 5 day Mar 36
Robert S. DeLoach
Clerk of Court

LLOYD A. MAGNEY
Attorney
Foley, Alabama

Lombard
2
Lynn

STATE OF ALABAMA.

BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon C. W. LYNN to appear within thirty (30) days from the service of this writ in the Circuit Court, to be held for said County at the place of holding the same, then and there to answer the complaint of IDA M. TURNBULL.

Witness my hand this the 10th day of August, 1935.

Robert S. Duck
Clerk.

IDA M. TURNBULL,
Plaintiff,
vs.
C. W. LYNN,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

1. The plaintiff claims of the defendant ONE THOUSAND DOLLARS (\$1,000.00) for that on, to-wit, August 9, 1935, the defendant negligently drove his automobile into or against the automobile of the plaintiff, which was then and there being operated along the Bay-Minette-Foley Highway, in Baldwin County, Alabama, at a point approximately five miles North of the town of Foley, and as a proximate result of the negligence on the part of the defendant, the plaintiff's automobile was damaged as follows: Radiator damaged; axle bent; two wheels broken; frame bent; hood damaged; windshield broken and left head-light broken and car otherwise damaged, all to the damage of the plaintiff; hence this suit.

2. The plaintiff claims of the defendant ONE THOUSAND DOLLARS (\$1,000.00) for that on, to-wit, August 9, 1935, the defendant, acting by and through his agent, whose name is not known to the plaintiff and who was acting in the line and scope of his em-

ployment, negligently ran an automobile of the defendant into or against the automobile of the plaintiff, which was then and there being operated along the Bay Minette-Foley Highway, in Baldwin County, Alabama, at a point approximately five miles North of Foley, and as a proximate result of such negligence, the automobile of the plaintiff was damaged as follows: Radiator damaged; axle bent; two wheels broken; frame bent; hood damaged; windshield broken and left head-light broken and car otherwise damaged, all to the damage of the plaintiff; hence this suit.

Beebe & Haege
Attorneys for Plaintiff.

We the Jury find for the Defendant
P. M. Robin
Toman

184
RECORDED
Shirk

IDA M. TURNBULL,
Plaintiff,

vs.

C. W. LYNN,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

SUMMONS AND COMPLAINT.

Filed August 10, 1935.

Robert S. Duck
Clerk. 0134

RECORDED
Shirk

Executed Aug 12 1935
by serving copy of within Summons and
Complaint on

C. W. Lynn

M. H. Wilkins Sheriff

By C. N. Anderson Deputy Sheriff

We the Jury find for the Defendant
P. M. Roban
Tolson

184
RECORDED
Hick

IDA M. TURNBULL,
Plaintiff,

vs.

C. W. LYNN,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

SUMMONS AND COMPLAINT.

Filed August 10, 1935.

Robert S. Duck
Clerk. 1134

RECORDED
Hick

Executed Aug. 12 1935
by serving copy of within Summons and
Complaint on

C. W. Lynn

M. H. Wilkins Sher
By C. N. Anderson Deputy Sher

IDA M. TURNBULL,)	
Plaintiff,)	IN THE CIRCUIT COURT OF
vs.)	BALDWIN COUNTY, ALABAMA.
C. W. LYNN,)	
Defendant.)	

Now comes the plaintiff and amends her original bill in this cause by adding the following Counts 3 and 4:

3. The plaintiff claims of the defendant ONE THOUSAND DOLLARS (\$1,000.00) for that on, to-wit, August 9, 1935, the defendant negligently drove his automobile into or against the automobile of the plaintiff, which was then and there being operated along the Bay-Minette-Foley Highway, in Baldwin County, Alabama, at a point approximately five miles North of the town of Foley, and as a proximate result of the negligence on the part of the defendant, the plaintiff's automobile was damaged as follows: Radiator damaged; axle bent; two wheels broken; frame bent; hood damaged; windshield broken and left head-light broken and car otherwise damaged; that the said automobile of the plaintiff was used for the purpose of transporting passengers for hire; that the said automobile was so damaged that it was necessary for the plaintiff to hire another automobile; all to the damage of the plaintiff; hence this suit.

4. The plaintiff claims of the defendant ONE THOUSAND DOLLARS (\$1,000.00) for that on, to-wit, August 9, 1935, the defendant, acting by and through his agent, whose name is not known to the plaintiff and who was acting in the line and scope of his employment, negligently ran an automobile of the defendant into or against the automobile of the plaintiff, which was then and there being operated along the Bay Minette-Foley Highway, in Baldwin County, Alabama, at a point approximately five miles North of Foley, and as a proximate result of such negligence, the automo-

bile of the plaintiff was damaged as follows: Radiator damaged; axle bent; two wheels broken; frame bent; hood damaged; windshield broken and left head-light broken and car otherwise damaged; that the said automobile of the plaintiff was used for the purpose of transporting passengers for hire; that the said automobile was so damaged that it was necessary for the plaintiff to hire another automobile; all to the damage of the plaintiff; hence this suit.

Beber, Hall & Beebe
Attorneys for Plaintiff.

TURNBULL,
Plaintiff,

vs.

C. W. LYNN,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AMENDED BILL OF COMPLAINT.

Filed Aug. 20, 1936
Robert S. Duck,
Clerk.

BEEBE, HALL & BEEBE
LAWYERS
BAY MINETTE, ALABAMA

IDA M. TURNBULL,)	
)	IN THE CIRCUIT COURT OF
Plaintiff,)	
)	BALDWIN COUNTY, ALABAMA.
vs.)	
)	
C. W. LYNN,)	
)	
Defendant.)	

Now comes the plaintiff and amends her original bill in this cause by adding the following Counts 3 and 4:

3. The plaintiff claims of the defendant ONE THOUSAND DOLLARS (\$1,000.00) for that on, to-wit, August 9, 1935, the defendant negligently drove his automobile into or against the automobile of the plaintiff, which was then and there being operated along the Bay-Minette-Foley Highway, in Baldwin County, Alabama, at a point approximately five miles North of the town of Foley, and as a proximate result of the negligence on the part of the defendant, the plaintiff's automobile was damaged as follows: Radiator damaged; axle bent; two wheels broken; frame bent; hood damaged; windshield broken and left head-light broken and car otherwise damaged; that the said automobile of the plaintiff was used for the purpose of transporting passengers for hire; that the said automobile was so damaged that it was necessary for the plaintiff to hire another automobile; all to the damage of the plaintiff; hence this suit.

4. The plaintiff claims of the defendant ONE THOUSAND DOLLARS (\$1,000.00) for that on, to-wit, August 9, 1935, the defendant, acting by and through his agent, whose name is not known to the plaintiff and who was acting in the line and scope of his employment, negligently ran an automobile of the defendant into or against the automobile of the plaintiff, which was then and there being operated along the Bay Minette-Foley Highway, in Baldwin County, Alabama, at a point approximately five miles North of Foley, and as a proximate result of such negligence, the automo-

bile of the plaintiff was damaged as follows: Radiator damaged; axle bent; two wheels broken; frame bent; hood damaged; windshield broken and left head-light broken and car otherwise damaged; that the said automobile of the plaintiff was used for the purpose of transporting passengers for hire; that the said automobile was so damaged that it was necessary for the plaintiff to hire another automobile; all to the damage of the plaintiff; hence this suit.

Beck & Co.
Attorneys for Plaintiff.

file of the plaintiff was damaged as follows: Radiator damaged;
axle bent; two wheels broken; frame bent; hood damaged; windshield
broken and left head-light broken and car otherwise damaged; that
the said automobile of the plaintiff was used for the purpose of
transporting passengers for hire; that the said automobile was
so damaged that it was necessary for the plaintiff to hire another
automobile; all to the damage of the plaintiff; hence this writ.

Robert H. Duck
Attorney for Plaintiff.

Filed Aug. 20, 1936
Robert H. Duck,
Clerk.

IDA M. TURNBULL,

Plaintiff,

-VS-

C. W. LYNN,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

PLEAS

Comes now the above named defendant and for answer to the
and to each count thereof separately & severally,
complaint of the plaintiff pleads:

1. ~~The general issue.~~

*That he is not guilty of the matters
and things set out in the complaint.*

2. The defendant avers that on, to-wit, August 9th, 1935,
he was driving his automobile along the public highway from Foley
to Bay Minette, in Baldwin County, Alabama, at a point approximate-
ly five (5) miles north of the Town of Foley and at the same time
and place the automobile of the plaintiff, which was in the possess-
ion and control of the agent of the plaintiff, one Charles Turnbull,
who, in the scope of his employment, was driving the automobile
of the plaintiff north along said highway towards Robertsedale;
that the said Charles Turnbull was intoxicated and while so intoxi-
cated carelessly and negligently drove the said automobile of the
plaintiff into and against the automobile of the defendant and as
the proximate result of the negligence of the said agent of the
plaintiff, the defendant's automobile was broken and damaged.

as a defense to the action of the Plaintiff and to recover his own damages
3. Defendant claims of the plaintiff the sum of FIFTY & 00/100
One hundred

(\$50.00) damages for that, on to-wit, August 9th, 1935, the plain-
tiff, acting by and through her agent, one Charles Turnbull, who
was acting in the line and scope of his employment, negligently
ran the automobile of the plaintiff into and against the automobile
of the defendant, which was then and there being operated along
the Bay Minette - Foley highway in Baldwin County, Alabama, at a
point approximately five (5) miles north of Foley, and as a proxi-
mate result of such negligence the automobile of the defendant was
damaged as follows: The radiator was damaged, the left head lamp
was broken, the left front fenders and the left running board were
broken and bent and the car of the defendant otherwise damaged, all

to the damage of the defendant as aforesaid, which defendant
offers to set off against Plaintiff's claim and prays judgment
for the excess.

Stacy R. Ramsey

Attorney for Defendant.

Defendant demands a trial by jury.

183 - **RECORDED**
Buckley
7-327

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IDA M. TURNBULL,

Plaintiff,

-VS-

C. W. LYNN,

Defendant.

PLEAS

Filed this 17 day Sept 1921
Arthur Duck
Clerk-Register

LLOYD A. MAGNEY
ATTORNEY AT LAW
FOLEY, ALABAMA

Executed Sept 19 1921
by serving copy of within ~~Summons~~
~~Complaint~~ *unit on*

Ida M. Turnbull

M. H. Wilkins Sheriff
By *C. N. Anderson* Deputy Sheriff

IDA M. TURNBULL,
Plaintiff,
-vs-
C. W. LYNN,
Defendant.

NO. 185
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

PLEAS OF DEFENDANT

Comes now the above named defendant and for further answer to the complaint of the plaintiff, and to each Count thereof separately and severally, says:

PLEA 4

That on, to-wit, August 9th, 1935, the defendant was driving his automobile along the public highway in Baldwin County, Alabama, between Robertsdale and Foley at a point approximately five miles north of the Town of Foley, and was proceeding thereon in a general southeasterly direction. That the automobile of the Plaintiff is a half-ton Chevrolet truck with Station wagon body used as a passenger bus along said highway between Bay Minette and Foley, and that on said August 9th, 1935, said automobile of the plaintiff was in the charge, custody and control of and being driven by the husband and agent of the plaintiff, Charles Turnbull.

That in the line and scope of his employment, as the agent of the plaintiff the said Charles Turnbull was driving the automobile of the plaintiff along said highway in the opposite direction to that of the defendant.

That said Charles Turnbull was under the influence of intoxicating liquor and while in such intoxicated condition negligently and carelessly drove the automobile of the plaintiff into and against that of the defendant, and defendant avers that such carelessness and negligence of the said Charles Turnbull, in driving plaintiff's automobile while intoxicated, was the proximate cause of the damage to plaintiff's automobile, of which she complains.

WHEREFORE, defendant says that plaintiff ought not to recover anything in this action.

PLEA 5

That on, to-wit, August 9th, 1935, the defendant was driving his automobile along the public highway in Baldwin County, Alabama, between Robertsdale and Foley, at a point approximately five miles north of the Town of Foley and was proceeding thereon in a general southeasterly direction. That the automobile of the plaintiff is a half ton Chevrolet truck with Station wagon body used as a passenger bus along said highway between Bay Minette and Foley and that on said August 9th, 1935, said automobile of the plaintiff was in the charge, custody and control of and being driven by the husband and agent of the plaintiff, Charles Turnbull.

That in the line and scope of his employment, as the agent of the plaintiff the said Charles Turnbull was driving the automobile of the plaintiff along said highway in the opposite direction to that of the defendant.

That at the point in said highway where said automobiles of the plaintiff and defendant met and should have passed, the automobile of the defendant was upon the extreme southerly or righthand edge of said highway, and the agent of the plaintiff, the said Charles Turnbull, carelessly and negligently drove the said automobile of the plaintiff, in the line and scope of his employment, upon the lefthand side of said highway where the automobile of the defendant was and had a right to be, and carelessly and negligently drove the automobile of the plaintiff into and against that of the defendant, on the wrong or left hand side of said highway and, thereby, caused the damage to the automobile of the plaintiff, of which she complains.

That the aforesaid carelessness and negligence on the part of the agent of the plaintiff, the said Charles Turnbull, in driving plaintiff's said automobile on the wrong side of the highway and into and against the automobile of the defendant was the proximate cause of the damage to plaintiff's automobile, of which she complains and such carelessness and negligence on the part of plaintiff's agent, the said Charles Turnbull, proximately contributed to the

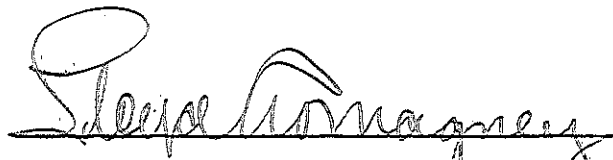
to the damage to plaintiff's automobile.

WHEREFORE, defendant says that plaintiff ought not to recover anything in this suit.

PLEA 6

Defendant avers that plaintiff's loss and damage, if any, was proximately caused by the contributory negligence of the plaintiff in this: That the automobile of the plaintiff was in the charge, custody and control of the husband and agent of the plaintiff Charles Turnbull, who, while in the line and scope of his employment, carelessly and negligently drove said automobile while intoxicated and who, carelessly and negligently, drove said automobile on the wrong side of the highway and into and against the automobile of the defendant, and that such carelessness and negligence on the part of the said Turnbull, the agent of the plaintiff, in driving plaintiff's automobile while he was intoxicated and on the wrong side of the highway and into and against the automobile of the defendant was the proximate cause of the loss and damage to the plaintiff.

WHEREFORE, defendant says plaintiff ought not to recover anything in this case.


Attorney for Defendant.

RECORDED
NO. 185
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
Duck
7. 44

IDA M. TURNBULL,

Plaintiff,

-VS-

C. W. LYNN,

Defendant.

PLEAS OF DEFENDANT

Filed March 30, 1936
Ruby Duck

LLOYD A. MAGNEY
Attorney
Foley, Alabama.

Term, 193.

Clerk.

[illegible]

RECORDED
No. 185
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
Duck
7. 44x

IDA M. TURNBULL,

Plaintiff,

-vs-

C. W. LYNN,

Defendant.

PLEAS OF DEFENDANT

Filed March 30, 1936
Ruth Duck

LLOYD A. MAGNEY
Attorney
Foley, Alabama.

The State of Alabama, {
Baldwin County

CIRCUIT COURT

To HON. JOE AKERMAN, ORLANDO, FLORIDA.

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, at such time and place as you may appoint, to call before you and examine C. W. LYNN, MRS. FERN KENYON LYNN and MISS MARGARET SAMMS

as witnesses in behalf of DEFENDANT in a cause pending in our Circuit Court of Baldwin County, of said State, wherein

IDA M. TURNBULL Complainant
and

C. W. LYNN Defendant,

on oath to be by you administered, upon them
to take and certify the depositions of the witnesses and return the same to our Court, with all convenient speed, under your hand.

Witness 27th day of March 1936

COMMISSIONER'S FEE, \$

WITNESS' FEES, \$

Robert L. Deek
REGISTERED
Clerk.

IDA TURNBULL,

Plaintiff

-vs-

C. W. LYNN,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

DEPOSITIONS OF SUNDRY WITNESSES ON BEHALF OF THE DEFENDANT
taken before me Joe Akerman, commissioner, at my office in Orlando,
Florida, this _____ day of March, 1936.

DEPOSITION OF C. W. LYNN

C. W. Lynn, being first duly sworn, on oath deposes as follows:

TO THE FIRST INTERROGATORY, he says: (Answer)

TO THE SECOND INTERROGATORY, he says: (Continue through
all of the interrogatories)

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(At the end of the complete deposition have the witness sign
his name.)

IDA M. TURNBULL,

Plaintiff,

-vs-

C. W. LYNN,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

INTERROGATORIES TO C. W. LYNN, MRS. FERN KENYON LYNN and
MISS MARGARET SAMMS.

INTERROGATORIES TO C. W. LYNN

INTERROGATORY NO. ONE: State your name, your place of residence and your business. Are you the defendant in this suit?

INTERROGATORY NO. TWO: Where were you on the 9th day of August, 1935?

INTERROGATORY NO. THREE: How long had you been in Baldwin County, Alabama, prior to the 9th day of August, 1935, and for what purpose were you there?

INTERROGATORY NO. FOUR: While you were in Baldwin County, Alabama, did you have with you an automobile? If so, please state what kind of a car it was.

INTERROGATORY NO. FIVE: Did anything happen to you or your car on the 9th day of August, 1935?

INTERROGATORY NO. SIX: Just where, in Baldwin County, and at what hour of the day or night did this accident occur?

INTERROGATORY NO. SEVEN: Who was with you in your car at the time of the accident?

INTERROGATORY NO. EIGHT: Where had you been just before the accident?

INTERROGATORY NO. NINE: Had you had any trouble with your car shortly before the accident?

INTERROGATORY NO. TEN: Please state what you did about that trouble as to having it corrected or repaired.

INTERROGATORY NO. ELEVEN: After you had your lights repaired, please state whether or not they operated as they should, whether or not, after the repairs, you believed them to be in good operating condition.

INTERROGATORY NO. TWELVE: After you had your lights repaired as you have told, what did you do then?

INTERROGATORY NO. THIRTEEN: How far is it, approximately, from Griffin Garage, where you had your lights repaired, to the point where the accident occurred?

INTERROGATORY NO. FOURTEEN: State whether or not your head lights on your car were burning at the time of the accident. If not, how long before had they been burning?

INTERROGATORY NO. FIFTEEN: When your lights failed, where were you, that is, how far were you from a repair shop or from your destination?

INTERROGATORY NO. SIXTEEN: After your lights failed did you leave your car on the road without lights or did you try to go on?

INTERROGATORY NO. SEVENTEEN: Please state just what you did to enable you to travel in your car without lights.

INTERROGATORY NO. EIGHTEEN: Was it while you were driving alone behind this other car and using the light from its headlights and displaying your flashlight from your car, as you have stated, that the accident happened?

INTERROGATORY NO. NINETEEN: Tell us just what did happen, how it occurred and all about it.

INTERROGATORY NO. TWENTY: What kind of a car was it which you say ran into you?

INTERROGATORY NO. TWENTY-ONE: Did you learn who was the driver of that bus and who was the owner of that bus? If so, please state the name of the driver and the name of the owner.

INTERROGATORY NO. TWENTY-TWO: What, if anything, did you discover or learn as to the condition of this driver of the bus, Charles Turnbull?

INTERROGATORY NO. TWENTY-THREE: Did he have anyone with him in the bus? If so, who and what was his condition?

INTERROGATORY NO. TWENTY-FOUR: What did this accident do to your car?

INTERROGATORY NO. TWENTY-FIVE: If there is anything further about this matter which you have not yet stated, please state it in your own words.

INTERROGATORY NO. TWENTY-SIX: If you have not already done so, please state where your car was with reference to the center line of the travelled part of the road, at the time the collision occurred.

INTERROGATORY NO. TWENTY-SEVEN: State in detail what you did after your accident.

INTERROGATORIES TO MRS. FERN KENYON LYNN

INTERROGATORY NO. ONE: Please state your name, your place of residence and your occupation, if any. Are you related to the defendant, Doctor C. W. Lynn, and if so, in what way?

INTERROGATORY NO. TWO: Where were you on the 9th day of August, 1935? If you state that you were in Baldwin County, Alabama, how long had you been there and what was the purpose of your being there?

INTERROGATORY NO. THREE: Do you know whether or not Doctor Lynn had his automobile with him in Baldwin County, Alabama, on August 9th, 1935? If he did, please state what kind of a car it was.

INTERROGATORY NO. FOUR: Do you know whether or not anything happened to Doctor Lynn's car on that day? If so, please state what it was.

INTERROGATORY NO. FIVE: Where and when did this accident happen?

INTERROGATORY NO. SIX: Who was in Doctor Lynn's car with him at the time the accident happened?

INTERROGATORY NO. SEVEN: State where you had all been in the car just before the accident happened.

INTERROGATORY NO. EIGHT: Had there been any trouble with the car? If so, please state what the trouble was.

INTERROGATORY NO. NINE: What, if anything, did Doctor Lynn do about the trouble with the lights on his car? If you state that he had the lights repaired, please state where this was done, by whom and when with reference to the time of the accident.

INTERROGATORY NO. TEN: After Doctor Lynn had the lights repaired, did they burn properly and illuminate the road as they should? Did they appear to be in good working order?

INTERROGATORY NO. ELEVEN: After Doctor Lynn had the lights repaired, what did you do?

INTERROGATORY NO. TWELVE: How far is it from Griffin's Garage where the lights were repaired, to the place the accident occurred?

INTERROGATORY NO. THIRTEEN: Were the lights on Doctor Lynn's car burning at the time of the accident? If not, how long before had they failed?

INTERROGATORY NO. FOURTEEN: When the lights failed again where were you, that is, how far from your destination or how far from a place where the lights could be repaired again?

INTERROGATORY NO. FIFTEEN: Did you leave the car or try to go on with it?

INTERROGATORY NO. SIXTEEN: Please state just what was done to enable the car to travel without headlights.

INTERROGATORY NO. SEVENTEEN: Was it while you were driving behind this other car and using the light from its head lights and displaying the flash light from your car, as you have stated, that the accident happened?

INTERROGATORY NO. EIGHTEEN: Please tell just what did happen, how the accident occurred and all about it.

INTERROGATORY NO. NINETEEN: Where was Doctor Lynn's car at the time of the accident with reference to the center line of the travelled part of the road?

INTERROGATORY NO. TWENTY: What kind of car was it that you say ran into Doctor Lynn's car?

INTERROGATORY NO. TWENTY-ONE: Did you learn who was driving the bus when it ran into Doctor Lynn's car, and did you learn who was the owner of the car? If you did so learn please state who was driving the car and who the owner was.

INTERROGATORY NO. TWENTY-TWO: What, if anything, did you see or discover or learn as to the condition of the driver of the car, which you say ran into you? Describe his condition and actions.

INTERROGATORY NO. TWENTY-THREE: Was there anyone else in the car with him? If so, who was it, if you know, and what was his condition?

INTERROGATORY NO. TWENTY-FOUR: What did the accident or collision do to Doctor Lynn's car?

INTERROGATORY NO. TWENTY-FIVE: After the accident what did you do?

INTERROGATORY NO. TWENTY-SIX: Was there anything that Doctor Lynn could have done, other than he did, to avoid the collision?

INTERROGATORIES TO MISS MARGARET SAMMS

INTERROGATORY NO. ONE: Please state your name, your place of residence and your occupation, if any. Are you related to the defendant, Doctor C. W. Lynn, and if so, in what way?

INTERROGATORY NO. TWO: Where were you on the 9th day of August, 1935? If you state that you were in Baldwin County, Alabama, how long had you been there and what was the purpose of your being there?

INTERROGATORY NO. THREE: Do you know whether or not Doctor Lynn had his automobile with him in Baldwin County, Alabama, on August 9th, 1935? If he did, please state what kind of car it was.

INTERROGATORY NO. FOUR: Do you know whether or not anything happened to Doctor Lynn's car on that day? If so, please state what it was.

INTERROGATORY NO. FIVE: Where and when did this accident happen?

INTERROGATORY NO. SIX: Who was in Doctor Lynn's car with him at the time the accident happened?

INTERROGATORY NO. SEVEN: State where you had all been in the car just before the accident happened?

INTERROGATORY NO. EIGHT: Had there been any trouble with the car? If so, please state what the trouble was.

INTERROGATORY NO. NINE: What, if anything, did Doctor Lynn do about the trouble with the lights on his car? If you state that he had the lights repaired, please state where this was done, by whom and when with reference to the time of the accident.

INTERROGATORY NO. TEN: After Doctor Lynn had the lights repaired, did they burn properly and illuminate the road as they should? Did they appear to be in good working order?

INTERROGATORY NO. ELEVEN: After Doctor Lynn had the lights repaired, what did you do?

INTERROGATORY NO. TWELVE: How far is it from Griffin's Garage where the lights were repaired, to the place the accident occurred?

INTERROGATORY NO. THIRTEEN: Were the lights on Doctor Lynn's car burning at the time of the accident? If not, how long before had they failed?

INTERROGATORY NO. FOURTEEN: When the lights failed/where again were you, that is, how far from your destination or how far from a place where the lights could be repaired again?

INTERROGATORY NO. FIFTEEN: Did you leave the car or try to go on with it?

INTERROGATORY NO. SIXTEEN: Please state just what was done to enable the car to travel without headlights.

INTERROGATORY NO. SEVENTEEN: Was it while you were driving behind this other car and using the light from its head lights and displaying the flash light from your car, as you have stated, that the accident happened?

INTERROGATORY NO. EIGHTEEN: Please tell just what did happen, how the accident occurred and all about it.

INTERROGATORY NO. NINETEEN: Where was Doctor Lynn's car at the time of the accident with reference to the center line of the travelled part of the road?

INTERROGATORY NO. TWENTY: What kind of car was it that you say ran into Doctor Lynn's car?

INTERROGATORY NO. TWENTY-ONE: Did you learn who was driving the bus when it ran into Doctor Lynn's car, and did you learn who was the owner of the car? If you did so learn please state who was driving the car and who the owner was.

INTERROGATORY NO. TWENTY-TWO: What, if anything, did you see or discover or learn as to the condition of the driver of the car, which you say ran into you? Describe his condition and actions.

INTERROGATORY NO. TWENTY-THREE: Was there anyone else in the car with him? If so, who was it, if you know, and what was his condition?

INTERROGATORY NO. TWENTY-FOUR: What did the accident or collision do to Doctor Lynn's car?

INTERROGATORY NO. TWENTY-FIVE: After the accident what did you do?

INTERROGATORY NO. TWENTY-SIX: Was there anything that Doctor Lynn could have done, other than he did, to avoid the collision?

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

IDA M. TURNBULL,)
 Plaintiff, (
-vs-)
C. W. LYNN,)
 Defendant. (
)

INTERROGATORIES TO C. W. LYNN, MRS. FERN KENYON LYNN and
MISS MARGARET SAMMS.

INTERROGATORIES TO C. W. LYNN

DEPOSITION OF C. W. LYNN

C. W. Lynn, being first duly sworn, on oath deposes as follows:

TO THE FIRST INTERROGATORY, he says: Doctor C. W. Lynn, physician at the Florida Sanitarium, Orlando, Florida.

TO THE SECOND INTERROGATORY, he says: In Baldwin County, Alabama.

TO THE THIRD INTERROGATORY, he says: Just a short time as we were travelling through on our way to Orlando, Florida.

TO THE FOURTH INTERROGATORY, he says: Yes, a Chevrolet 1933 sedan.

TO THE FIFTH INTERROGATORY, he says: Yes, I had an accident with my automobile.

TO THE SIXTH INTERROGATORY, he says: It was between Summerdale and Foley and it occurred around eight o'clock.

TO THE SEVENTH INTERROGATORY, he says: My mother and father, wife, baby and nurse.

TO THE EIGHTH INTERROGATORY, he says: Mobile, Alabama.

TO THE NINTH INTERROGATORY, he says: Yes, I had trouble with the lights.

TO THE TENTH INTERROGATORY, he says: I stopped at Griffin's garage to have the lights repaired.

TO THE ELEVENTH INTERROGATORY, he says: They worked alright for a while and then they went out.

TO THE TWELVTH INTERROGATORY, he says: I continued on my trip.

TO THE THIRTEENTH INTERROGATORY, he says: Six miles.

TO THE FOURTEENTH INTERROGATORY, he says: I do not know, the parking lights were burning after the accident, but I do not know whether or not the headlights were burning at all or not.

TO THE FIFTEENTH INTERROGATORY, he says: A block and a half.

TO THE SIXTEENTH INTERROGATORY, he says: We went on with the aid of another automobile which lead the way. I had a flashlight which we also used.

TO THE SEVENTEENTH INTERROGATORY, he says: We proceeded as I have just stated.

TO THE EIGHTEENTH INTERROGATORY, he says: Yes it was.

TO THE NINETEENTH INTERROGATORY, he says: The nurse was driving at the time and we were going along moderately slow behind the car that was leading us. We were both well to the right side of the road. We proceeded for a short way in this manner and then we notice an automobile approaching us from the opposite direction coming at a fast speed. As this approaching car arrived at the point of the leading automobile it nearly hit the automobile and the driver only avoided being hit by swerving off to the side. We were directly behind him and did not have time to get out of the way and the car crashed into us.

TO THE TWENTIETH INTERROGATORY, he says: It was a wooden frame structure that looked like a small bus.

TO THE TWENTY-FIRST INTERROGATORY, he says: The driver was a Sheriff whose name was Turnbull.

TO THE TWENTY-SECOND INTERROGATORY, he says: He was under the influence of alcohol.

TO THE TWENTY-THIRD INTERROGATORY, he says: Yes, he had another man with him who was very drunk.

TO THE TWENTY-FOURTH INTERROGATORY, he says: It demolished the left side of the car, the fenders, front wheel, tire cover, running board and broke the axle and driving rod.

TO THE TWENTY-FIFTH INTERROGATORY, he says: I spent twenty-five Dollars to have the car partly repaired in Alabama and one hundred Dollars more when I arrived home. I don't know of anyway that the accident could have been avoided under the circumstances. The driver of the car that ran into us was not a fit person to be

driving an automobile in his condition at the time.

TO THE TWENTY-SIXTH INTERROGATORY, he says: My car was well on the right side of the road.

TO THE TWENTY-SEVENTH INTERROGATORY, he says: We had the car taken to the Summerdale Garage where we had it repaired so that we could proceed to Orlando. We stayed in Summerdale for two days while this was being done and then we continued our journey to Orlando. The car was repaired further after arriving home.

C. W. Lynn

DEPOSITION OF MRS. FERN KENYON LYNN

Mrs. Fern Kenyon Lynn, being first duly sworn, on oath deposes as follows:

TO THE FIRST INTERROGATORY, she says: I am the wife of the defendant, Dr. C. W. Lynn, I have no occupation and I live in Orlando, Orange County, Florida.

TO THE SECOND INTERROGATORY, she says: In Baldwin County, Alabama, we were going through from Mobile to Pensacola and we were there only a short time. We were on our way home to Orlando, Florida.

TO THE THIRD INTERROGATORY, she says: Yes, he had his car it was a Chevrolet 1933 Master sedan.

TO THE FOURTH INTERROGATORY, she says: Yes, something did happen to the car a man driving a small bus type automobile ran into him while we were travelling.

TO THE FIFTH INTERROGATORY, she says: It happened near Summerdale, Alabama, between Summerdale and Foley. It happened on the 9th day of August, 1935 about eight o'clock in the evening.

TO THE SIXTH INTERROGATORY, she says: His Mother and father, the nurse and baby and myself were with him.

TO THE SEVENTH INTERROGATORY, she says: We were just driving on the road.

TO THE EIGHTH INTERROGATORY, she says: There was some trouble with the lights on the car. They kept coming off and on something went wrong with the wiring.

TO THE NINTH INTERROGATORY, she says: Dr. Lynn stopped at Griffin's Garage and had them fixed and attended to about six miles from where the accident occurred. It was just a place in the road with a store and garage and a few little buildings. That was about an hour prior to the accident around 7 o'clock I would say. It wasn't quite dark.

TO THE TENTH INTERROGATORY, she says: Yes, they appeared to be in good working order.

TO THE ELEVENTH INTERROGATORY, she says: I just continued along with the rest of them on our journey.

TO THE TWELVTH INTERROGATORY, she says: About six miles from where the accident occured.

TO THE THIRTEENTH INTERROGATORY, she says: I don't think they were burning and if they were it was only a few minutes before the accident that they went out.

TO THE FOURTEENTH INTERROGATORY, she says: We didn't know at the time we found out later that it was about a block and a half from our destination.

TO THE FIFTEENTH INTERROGATORY, she says: We stayed with the car for about an hour and then went to a tourist camp for the night.

TO THE SIXTEENTH INTERROGATORY, she says: We were lead by another car and a flashlight which belonged to the Doctor. We were going slowly and the other car with lights lead the way.

TO THE SEVENTEENTH INTERROGATORY, she says: Yes it was.

TO THE EIGHTEENTH INTERROGATORY, she says: We were driving on a perfectly straight dirt road which was smooth, the car to the front of us was driving well to the right and we were driving directly behind it. We saw another car coming ahead and the driver was driving fast and when he reached the point of the car in front of us it was so close to the car that the man in front of us had to dodge it to keep from being hit. We were right behind the car that dodged and we didn't have time to do anything the car just came right into us and sideswept us. We weren't able to get the perspective the other car did and get out of the way.

TO THE NINETEENTH INTERROGATORY, she says: It was in the grass driving well to the right of the road.

TO THE TWENTIETH INTERROGATORY, she says: it was a wooden bodied automobile a ford, I believe.

TO THE TWENTY FIRST INTERROGATORY, she says: The owner was driving the car and he was a Sheriff named Turnbull. He seemed to be either under the influence of liquor or just drunk. He was in a high tension and very nervous at the time. He was in an intoxicated condition.

TO THE^TWENTY-THIRD INTERROGATORY, she says: There was another man with him and I do not know his name, but he was so drunk he couldn't stand up.

TO THE TWENTY-FOURTH INTERROGATORY, she says: It smashed the front wheel and took off the front and back fender, bent the axle and twisted the body. It also ruined the radiator and tire case on the side..

TO THE TWENTY-FIFTH INTERROGATORY, she says: We stayed about an hour with the car and then went to an auto camp.

TO THE TWENTY-SIXTH INTERROGATORY, she says: No, there was nothing he could have done to avoid it.

Mrs. Fern Kenyon Lynn

DEPOSITION OF MISS MARGARET SAMMS

Miss Samms, being first duly sworn, on oath deposes as follows:

TO THE FIRST INTERROGATORY, she says: Margaret Hart Samms, Orlando, Florida. I am a graduate nurse. I am not related to Dr. Lynn in any way.

TO THE SECOND INTERROGATORY, she says: I was in Baldwin County, Alabama just driving through on our way home to Orlando, Florida. We were there just a short time.

TO THE THIRD INTERROGATORY, she says: Yes, it was a Chevrolet 1933 Master sedan.

TO THE FOURTH INTERROGATORY, she says: We had a head on collision and the car was badly wrecked.

TO THE FIFTH INTERROGATORY, she says: It happened in Baldwin County between Summerdale and Foley on August 9, 1935.

TO THE SIXTH INTERROGATORY, she says: His mother, father, wife, baby and myself.

TO THE SEVENTH INTERROGATORY, she says: We were just travelling along the road.

TO THE EIGHT^H INTERROGATORY, she says: We had trouble with the lights they came on and went off.

TO THE NINTH INTERROGATORY, she says: We stopped at Griffin's garage and had them fixed and oked by the mechanic. It was about an hour prior to the accident.

TO THE TENTH INTERROGATORY, she says: They worked alright for a time and then they went out and didn't come on again.

TO THE ELEVENTH INTERROGATORY, she says: We just continued on our way.

TO THE TWELVTH INTERROGATORY, she says: Six miles.

TO THE THIRTEENTH INTERROGATORY, she says: The parking lights were on after the accident, but we do not know whether the other lights had been on or not. If they had gone out just before the accident it was probably only a few minutes before.

TO THE FOURTEENTH INTERROGATORY, she says: About a block and a half.

TO THE FIFTEENTH INTERROGATORY, she says: No, we stayed with it.

TO THE SIXTEENTH INTERROGATORY, she says: We were driving due south and the lights went out and we stopped and a few minutes later a car came up behind us and saw that we were having trouble and they let us get in behind them and they lead the way down the road with the aid of a flashlight which the Doctor had.

TO THE SEVENTEENTH INTERROGATORY, she says: Yes it was.

TO THE EIGHTEENTH INTERROGATORY, she says: We were driving between twenty and twenty-five miles per hour and I was driving very carefully and endeavored to keep on my side of the road directly behind the car that was leading us. We notice a car coming from the opposite direction quite rapidly and as it came up beside the car in front of us it was so close to it that the driver had to swerve his car out of the way to avoid being hit by it. That left us in a position where we couldn't get out of the way in time to avoid being hit and this car sideswept us. He hit us on the left hand fender and hit us pretty square because the left wheel in the front collapsed.

TO THE NINETEENTH INTERROGATORY, she says: We were on the right side of the road, extremely to the right side.

TO THE TWENTIETH INTERROGATORY, she says: It was a wooden framed bus type automobile.

TO THE TWENTY-FIRST INTERROGATORY, she says: It was a Sheriff and his name was Turnbull.

TO THE TWENTY-SECOND INTERROGATORY, she says: He appeared to be very nervous more so than any of us, although/^{we}were all shaken up quite a bit and excited. He tried to write my name down and it took four attempts before he succeeded. He was either under the influence of intoxicating liquors or the liquor odor was in his clothing from contact with the other man who was exceedingly drunk.

TO THE TWENTY-THIRD INTERROGATORY, she says: There was another man who was thoroughly drunk.

TO THE TWENTY-FOURTH INTERROGATORY, she says: Collapsed the left front wheel, fender, running board and rear fender, broke the radiator, bent the axle and one driving rod and minor damage such as tearing the cover to the spare tire and there was a hole in the body.

TO THE TWENTY-FIFTH INTERROGATORY, she says: We remained with the car and then went to the tourist camp.

TO THE TWENTY-SIXTH INTERROGATORY, she says: NO, there was not.

Miss Margaret Samuel

CERTIFICATE OF COMMISSIONER:

STATE OF FLORIDA }
COUNTY OF ORANGE }

I, Joe Akerman, by virtue of the annexed commission, commissioner to take the testimony, in response to the foregoing interrogatories and cross interrogatories, of C. W. Lynn, Mrs. Fern Kenyon Lynn and Miss Margaret Samms, do hereby certify that on this day I caused the said witnesses to come before me in my office in Orlando, Florida; that each of said witnesses was by me first duly cautioned and solemnly sworn; that the answers of each of said witnesses was reduced to writing by me (or was taken in shorthand by Irene Malecky, an impartial person, in the language of the witness and later reduced to typewriting, as the case may be); that thereafter the said testimony was read over by the witnesses and by them signed; that I have personal knowledge of the identity of each of the witnesses and that I am not of counsel or or kin to any of the parties to the cause, or in any manner interested in the result thereof.

IN TESTIMONY WHEREOF: I have hereunto set my hand this

31 day of March, 1936.

Joe Akerman
Commissioner

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

IDA M. TURNBULL,

Plaintiff,

- VS -

C. W. LYNN,

Defendant.

DEPOSITION OF DEFENDANTS
AND WITNESSES

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Filed May 5 1936
Ruth L. Duck
Clk

Joe. A. Kuman
LAW OFFICES

ORLANDO, FLORIDA

CLERK'S FEES		at	AMOUNT	SHERIFF'S FEES		at	AMOUNT
Taking Affidavit.....	.50			Arrest.....	2.00		
Issuing..... Capias.....	.50			Bond.....	1.00		
-----				Guarding Prisoner.....	2.00		
Docketing.....	.10	10		Serving..... Subpoenas.....	.50		
Issuing..... Subpoenas.....	.25	175		Serving..... Notices.....	.50		
-----				Executing Search Warrant, Day.....	1.00		
Continuance by Defendant.....	.25	25		Executing Search Warrant, Night.....	2.00		
-----				Summoning Jury in Capital Case or Special Criminal Court.....	5.00		
Order of Removal and Incidents.....	1.00			Fees in County Court.....			
-----				Seizure.....	3.00		
Taking..... Recognizances.....	.50			Miles @ 10c.....			
Discharge of Bail.....	.50						
Entry of..... Forfeiture vs. De- fendant.....	.50			RECAPITULATION.			
Final Judgment of Forfeiture vs. Defendant.....	.50			Fine.....			
Entry of..... Forfeiture vs. Witness and Jurors.....	.25			Clerk's Fees.....			
Trial.....	.50	60		Sheriff's Fees.....			
Judgment.....	.25	25		Solicitor's Fees.....			
Final Judgment of Sentence.....	.25	25		Justice's Fees.....			
Issuing..... Execution.....	.50	50		Constable's Fees.....			
Issuing..... Sci. Fas and Copies.....	.70	70		Witness Fees in Circuit Court.....			
Transcrip and Certificate..... Folios.....	.15			Witness Fees in County Court.....			
Final Record..... Folios.....	.15	300		County Court Judge's Fees.....			
Record of Supreme Court..... Folios.....	.15			Removal Bill.....			
Certifying Same.....	.25			Stenographer.....	5.00		
Recording Indictment.....	.25			Trial Tax.....	3.00		
Clerk's Fees in County Court.....				Board..... Days at.....			
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Total Clerk's Fees.....		630		Total Fees and Fines.....			

STATE OF ALABAMA, BALDWIN COUNTY.

To Any Sheriff of the State of Alabama—GREETING:

You are hereby commanded that of the goods and chattels, lands and tenements of

you cause to be made the sum of

Dollars and _____ Cents, which the State of Alabama, for the use of Baldwin County, hath recovered against _____

_____ on the 15 day of _____
 1922, by the judgment of our _____
 Court, held for the County
 of Baldwin, besides _____

cost of prosecution; and have the same to render to the said State for the use aforesaid; and make return of this writ, and the execution thereof, according to law.

Witness my hand, this 21 day of April 1960

Clerk.

STATE OF ALABAMA,)
BALDWIN COUNTY.)

KNOW ALL MEN BY THESE PRESENTS, That we, C. W. LYNN,
as principal, and the undersigned as sureties, are held and firmly
bound unto IDA M. TURNBULL in the sum of FIVE HUNDRED (\$500.00)
DOLLARS for the payment of which well and truly to be made, we
jointly and severally bind ourselves, our heirs, executors and
administrators.

Sealed with our seals and dated this the 12 day of
August, 1935.

The condition of the above obligation is such that, whereas
a writ of attachment issued by Robert S. Duck, Clerk of the Circuit
Court of Baldwin County, Alabama, at Law, in the instance of the
said IDA M. TURNBULL against the Estate of C. W. LYNN, returnable
to the Circuit Court of Baldwin County, Alabama, as required by
law, has been placed in the hands of M. H. Wilkins, Sheriff of
Baldwin County, Alabama, and by him levied upon the following prop-
erty:

*One Chevrolet Regular Sedan Automobile
1933 Model Motor No. 3101228*

And Whereas, the said property had been delivered to the
said C. W. LYNN upon his executing this bond.

NOW THEREFORE if the said C. W. LYNN, Defendant, shall
fail in said action, he, or his security, shall return the specified
property attached as aforesaid to the Sheriff of Baldwin County, Ala-
bama, within thirty (30) days after judgment in said suit, together
with all costs of this suit, and damages for the use of said car,
from the date of this bond, to the date of judgment, then this ob-

ligation to be void, otherwise to remain in full force and effect.

and we, and each of us, hereby waive all right of claim of exemption we, or either of us, have now or may hereinafter have under the Constitution and laws of the State of Alabama; and We hereby severally certify that we have property free from all encumbrances to the full amount of the above bond.

WITNESS our hands and seals this 12 day of August,
1935.

J. W. Lynn M. D. (SEAL)

F. J. Cheseman (SEAL)

E. H. Tietgen (SEAL)

(S-1)

Approved August 16th 1936.

Robert L. Vucelja

Chick

185

RECORDED
(11/1/35)

MRS. IDA M. TURNBULL

VS

C. W. LYNN

BOND OF DEFENDANT

Filed August 14th, 1935.

The State of Alabama, }
Baldwin County

TO ANY SHERIFF OF THE STATE OF ALABAMA;

WHEREAS, Mrs. Ida M. Turnbull

Robert S. Duck,
hath complained on oath to me, ~~XXXXXX~~ Clerk of Circuit Court of Baldwin County,
Ala., that C. W. Lynn

is justly indebted to the Plaintiff Mrs. Ida M. Turnbull

in the sum of One Thousand Dollars, and

~~having made affidavit and given bond~~
Plaintiff elects not to give bond. Deft. Being a non-resident
~~as required by law in such cases.~~ you are hereby commanded to attach so much of the estate of
C. W. Lynn

as will be of value sufficient to satisfy said debt and costs, according to the complaint; and such
estate, so attached unless replevied, so to secure, that the same may be liable to further pro-
ceedings thereon to be had by the Circuit Court of Baldwin County, Ala., at a term thereof, to be
held at the Court House of said County, on 3rd Monday of
August 1935 next; when and where you must make known to said Court how
you have executed this Writ,

WITNESS, my hand, this 10th day of August A. D. 1935

Robert S. Duck Clerk.
asst

Exempted Aug 12, 1935
by attaching one
Chevrolet Regular
Sedan Automobile
1933 Model Mfr.
No 3601228 as
the property of C. W.
Lynn, and storing
same at Tutzger Garage
Summersdale, Ala.

M. H. Wilkins Sheriff
C. N. Anderson D. S.

RECORDED

No. 185

ATTACHMENT

Mrs. Ida M. Turnbull

Vs. } Attachment

C. W. Lynn

Issued Aug 10, 1935

Moore Printing Co. Bay Minette, Ala.

STATE OF ALABAMA.

BALDWIN COUNTY.

Before me, ROBERT S. DUCK, Clerk of the Circuit Court of Baldwin County, Alabama, personally appeared IDA M. TURNBULL, who being duly sworn, on oath deposes and says that C. W. Lynn is justly indebted to her in the sum of ONE THOUSAND DOLLARS (\$1,000.00), after allowing all just offsets and discounts; that the said C. W. Lynn is a non-resident of the State of Alabama and that this attachment is not sued out by her for the purpose of vexing or harassing the said C. W. Lynn.

Ida M. Turnbull.

Subscribed and sworn to before
me, this the 10th day of August,
1935.

Robert S. Duck
Clerk of the Circuit Court of
Baldwin County, Alabama.

185
RECORDED

Duck

IDA M. TURNBULL,
Plaintiff,

vs.

C. W. LYNN,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

ATTACHMENT AFFIDAVIT.

Filed Aug 10, 1935
Robert F. Duck
Clerk