

Plaintiff,

versus

HORACE G. BRIDGES,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

Plaintiff claims of the defendant the sum of Twenty-five Thousand Dollars (\$25,000.00) as damages, for that heretofore on, to-wit, the 5th day of September, 1937, the defendant so operated an automobile on U. S. Highway No. 31, a public highway in Baldwin County, Alabama, approximately eight miles South of Stapleton, Alabama, as to wilfully or wantonly injure the plaintiff who was then and there occupying said automobile being operated by the defendant as a guest of the defendant, by wilfully or wantonly allowing the same to collide with another automobile being then and there operated over and along said highway at said point, thereby causing the said automobile in which plaintiff was riding to be thrown or to skid off of said highway, and as a proximate result of said wantonness plaintiff suffered the following injuries:- A compound fracture of the skull, a severe laceration of the forehead, extending the entire width thereof, a severe laceration of the chin, extending into the oral cavity, lacerations of the left leg, compound dislocation of the right ankle, bi-lateral dislocation of the hips, twelve fractured ribs, fracture of the left shoulder, and she was otherwise bruised and cut over and about her body, and will be confined to her bed for a long period of time, and will be required to expend a large sum of money for doctors' treatment and nurses' care and for medical expenses. She will be caused to lose considerable time from her work. Plaintiff also avers that she has been caused to suffer great physical pain and mental anguish, and has been made severely sick, sore,

and permanently lame therefrom, and that the injuries suffered by her are of a permanent nature; WHEREFORE, she brings this suit.

Smith & Johnston
Attorneys for Plaintiff

Plaintiff demands a trial by jury of the above entitled cause.

Smith & Johnston
Attorneys for Plaintiff

THE STATE OF ALABAMA,
Baldwin County.

No. _____

CIRCUIT COURT

Sept. 23

1937

To Any Sheriff of the State of Alabama :

You are hereby commanded to summon HORACE G. BRIDGES.

to appear and plead, answer or demur, within thirty day from the service hereof, to the Complaint filed in
the Circuit Court of Baldwin County, State of Alabama at Bay Minette, Ala., against

Horace Bridges, Defendant by Mrs Zelna Brittain.

Plaintiff

Witness my hand this 23 day of Sept. 1937Reid Clerk.

COMPLAINT

Mrs Zelna Brittain. Plaintiff versus Horace G Bridges.

The Plaintiff claims of the Defendant Opelika. Lee County Ala.

Dollars, due by

Smith & Johnston.

Plaintiff's Attorney.

Lee Co.

No. _____

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

Mrs Zelna Brittain.

PLAINTIFF

VS.

Horace G Bridges.

DEFENDANT

Summons and Complaint

Filed, Sept 23, 1937

_____, Clerk.

Defendant Lives at

Opelika, Ala.

Smith & Johnston,
Plaintiff's Attorney.

Defendant's Attorney

MOORE PRINTING CO., BAY MINETTE, ALA.

RECORDED

Deed
8-140

RECEIVED IN OFFICE

_____, 1937

W.E. _____, Sheriff

I have executed this Writ

this Sept. 24, 1937

by leaving a copy of the within Summons and Complaint with

Horace G. Bridges

W.E. Hall

_____, Sheriff.

E.L. Forester, Deputy Sheriff.

MRS. ZELNA BRITTAIN,

Plaintiff,

versus

HORACE G. BRIDGES,

Defendant.

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

INTERROGATORIES PROPOUNDED TO THE DEFENDANT BY THE PLAINTIFF
UNDER SECTION 7764 OF THE CODE OF 1923

1. (a) Please give your full name, age, and address. (b) What is your business or occupation? (c) How long have you been so engaged? (d) Please state whether or not on the night of September 5, 1937, an automobile driven by you was involved in an accident with another car on U. S. Highway No. 31, in Baldwin County, Alabama. (e) If so, please state where said accident occurred and the time of the accident. (f) Did said accident occur approximately eight miles South of Stapleton, in Baldwin County, Alabama? (g) Where were you going at the time of said accident? (h) Where were you coming from prior to said accident? (i) On whose business were you engaged at the time of said trip? (j) What was the nature of your trip? (k) Was your trip one of business or pleasure?

2. (a) Are you an employee of Western Auto Supply Company? (b) If your answer be in the affirmative, please state the nature of your employment. (c) Do you travel for said Western Auto Supply Company? (d) At the time of said accident, were you engaged in any business for said Western Auto Supply Company? (e) Who was traveling with you at the time of said accident? (f) Was Mrs. Zelna Brittain, the plaintiff in this suit, a passenger in your car on said occasion? (g) How did the plaintiff come to be a passenger

in your car on said occasion? (h) Was she a guest of yours while riding in said automobile? (i) How long had she been in said car prior to the accident?

3. (a) Please describe in detail how said accident occurred? (b) What was the condition of the weather on the night of said accident? (c) What was the nature of the highway on which you were traveling? (d) Was it a concrete or black asphalt highway? (e) How fast were you traveling when said accident occurred? (f) How fast were you traveling immediately prior to said accident? (g) How far did your car travel after coming into collision with the other car? (h) Where did your automobile finally come to rest after said collision?

4. (a) Please give the make, year model, license number, and motor number of the automobile which you were operating at the time of said accident. (b) Is said automobile registered in your name? (c) To whom does said automobile belong? (d) Was the license borne by said automobile issued to you for the automobile involved in the accident, or for some other automobile.

Smith & Johnston
Attorneys for Plaintiff

STATE OF ALABAMA)
)
COUNTY OF MOBILE)

Before me, the undersigned authority in and for said state and county, personally appeared Dan T. McCall, Jr., who, upon being first duly sworn, on oath deposes and says that he is one of the attorneys for the plaintiff in the above entitled cause, and that the answers to the above and foregoing interrogatories, if truthfully made, will be material evidence for the plaintiff in this cause.

Dan T. McCall Jr.

Subscribed and sworn to before
me this 22nd day of September,
1937.

Gouverneur G. Greenwood
Notary Public, Mobile County, Alabama

have executed the within writ
by leaving copy of same with

Harace G. Bridges

this the 24 day of Sept. 1937

W.E. Hall

Sheriff

E.E. Lawrence

Filed Sept 23 1937

R. Duck

Clint