

STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon SOUTHERN KRAFT CORPORATION, a Corporation, to appear within thirty days from the service of this writ, in the Circuit Court to be held in said County, at the place of holding the same, then and there to answer the complaint of MRS. C. A. HENRY.

WITNESS my hand this 1st day of February, 1937.

R. S. Duck
Clerk.

MRS. C. A. HENRY,

Plaintiff,

VS.

SOUTHERN KRAFT CORPORATION,
a Corporation,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

FIRST:

The Plaintiff claims of the Defendant the sum of TWENTY-NINE HUNDRED NINETY-FIVE and 00/100 (\$2995.00) DOLLARS, that on to-wit, October 21st, 1936, the Defendant, acting by and through its agent, servant or employee, James Green, 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 along a highway in Baldwin County, Alabama, known as the "Old Spanish Trail" approximately one-half mile North of Loxley, as to cause it to run into or against, or collide with an automobile in which the Plaintiff was riding and as a proximate result thereof, the Plaintiff was seriously injured as follows, to-wit:

Her side was injured; her arm injured; her ankle and leg injured; that her ankle was broken; and that she was caused to suffer other injuries; that she was caused great physical pain and mental anguish and to incur doctor, hospital and drug bills and other expenses; that she was caused to lose time from her work and duties; that she was made sore and lame and suffered serious and permanent injuries.

Plaintiff avers that her injuries were proximately caused by the

negligence of the Defendant, acting by and through its agent, servant or employee, James Green, while acting within the line and scope of his employment in and about the management or operation of the said automobile which he was then and there driving.

SECOND:

Plaintiff claims of the Defendant the further sum of ~~TWENTY-NINE HUNDRED NINETY-FIVE and 00/100 (\$2995.00)~~ DOLLARS, for that on to-wit, October 21st, 1936, the Defendant's agent, servant or employee, James Green, who was then and there acting within the line and scope of his employment, negligently ran an automobile which he was then and there driving along the "Old Spanish Trail" a public highway in Baldwin County, Alabama, at a point approximately one-half mile North of Loxley, into or against an automobile in which the Plaintiff was then and there riding and as a proximate result thereof, the Plaintiff was seriously injured as follows, to-wit:

Her side was injured; her arm injured; her ankle and leg injured; that her ankle was broken; and that she was caused to suffer other injuries; that she was caused great physical pain and mental anguish and to incur doctor, hospital and drug bills and other expenses; that she was caused to lose time from her work and duties; that she was made sore and lame and suffered serious and permanent injuries.

Plaintiff avers that her injuries were proximately caused by the negligence of the said James Green, an agent, servant or employee of the Defendant, who was then and there acting within the line and scope of his employment in or about the management or operation of the automobile which he was then and there driving.

Richard Lee Beche
Attorneys for Plaintiff.

Plaintiff demands a trial by Jury.

Richard Lee Beche
Attorneys for Plaintiff.

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SUMMONS AND COMPLAINT

MRS. C. A. HENRY,

Plaintiff,

VS.
138 S. S. Highway Apt
SOUTHERN KRAFT CORPORATION,
a Corporation,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW.

Filed February 1, 1937.
R. S. Duck,
Clerk.

Received 4 Day of Feb 1937
and on 13 Day of Feb 1937
I served a Copy of the within
on Southern Kraft Corp., a
Corp.

by service on S. S. Hallaway
as Agent

R. L. HOLCOMBE, Sr., Sheriff
By G. H. Lutzman D. S.

