

581

STATE OF ALABAMA,)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon ROBERTS MOTOR COMPANY, a Corporation, to appear within thirty 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 M. BONNER.

WITNESS my hand this 19th day of April, 1940.

R. S. Duck
Clerk.

M. BONNER,

Plaintiff,

VS.

ROBERTS MOTOR COMPANY, a
Corporation,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

1. The Plaintiff claims of the Defendant Five Hundred (\$500.00) Dollars, as damages, for that heretofore, on to-wit, February 15th, 1940, the Defendant, acting by and through its agent, servant or employee, who was then and there acting within the line and scope of his employment, so negligently operated an automobile on the Bay Minette-Mobile Highway, in Baldwin County, Alabama, at a point approximately two miles South of Bay Minette, that it was run into or against an automobile in which the Plaintiff was riding, and as a proximate result thereof, the Plaintiff was injured as follows: Head cut; Head and knees cut and lacerated; chest and nose cut, bruised, and lacerated; that as a result thereof he necessarily incurred medical, drug and doctor bills; that he was caused to lose time from his employment; that he was permanently injured.

The Plaintiff alleges that said injuries were the proximate result of the negligence of the Defendant, acting by and through its agent, servant or employee, who was then and there acting within the line and scope of his employment.

2. The Plaintiff claims of the Defendant the further sum of Five

Hundred (\$500.00) Dollars damages, for that heretofore, unto-wit, February 15th, 1940, the Defendant, acting by and through its agent, servant or employee, who was then and there acting within the line and scope of his employment, so negligently operated an automobile on or along the Bay Minette-Mobile Highway, in Baldwin County, Alabama, at a point approximately two miles South of Bay Minette, that it was caused to run into or against the automobile of the Plaintiff, which was then and there upon said highway, and as a proximate result thereof, the automobile of the Plaintiff was damaged as follows: Radiator, radiator grill, lights, axle, left front fender, frame, hood, steering gear, water pump, right running board, windshield, and bumper were damaged, and his car otherwise damaged.

The Plaintiff alleges that said damages were the proximate result of the negligence of the Defendant, acting by and through its agent, servant or employee, who was then and there acting within the line and scope of his employment.

BEEBE & HALL,

By: [Signature]
Attorneys for Plaintiff.

Plaintiff demands a trial by Jury.

BEEBE & HALL,

By: [Signature]
Attorneys for Plaintiff.

RECORDED 581

Recieved in Sheriff Office
this the 19th Day of April 1940
W.R. Stuart Sheriff

SUMMON AND COMPLAINT

M. BONNER,

Plaintiff,

VS.

ROBERTS MOTOR COMPANY,
a Corporation,

Defendant.

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

Filed this 19 day April 1940

R.S. Duck

Clerk-Roberts

Executed 4/20 1940
by serving copy of within Summons and
Complaint on

W. N. Roberts as President
of Roberts Motor Company

W. R. Stuart Sheriff

By Deputy Sheriff

THE STATE OF ALABAMA

BALDWIN COUNTY

No. 577

CIRCUIT COURT

Judgment _____ Term, 193_____

VS.

Term, 193____, of the Circuit Court of said County,

DEAR SIRS: At the

recovered a judgment against _____
for the sum of _____ Dollars

besides _____ Dollars, cost of suit, and execution
was duly issued thereon, commanding any Sheriff of the State that he cause to be made of the goods and chattels, land and tene-
ments of said _____

the amount of the judgment and costs, and the Sheriff has returned said exception indorsed, "No Property Found," and the costs have never been paid. In order to save you the additional expense of an execution against you, I herewith inclose an itemized statement of the costs which have accrued in said cause, and respectfully request that you will, on receipt of this, remit the amount. If I do not hear from you in a few days I will forward the execution to the Sheriff of your County for collection.

Respectfully yours, _____, Clerk.

[illegible]

BALDWIN

State of Alabama---~~Mobile~~ County

CIRCUIT COURT, OCTOBER TERM 19³⁹

M. Bonner

vs.

Roberts Motor Co. etc

Mobile, Ala., May 3, 1940 19

We appear for

the Defendants

in the above entitled cause and reserve the right to demur or plead specially.

George A. Tonsmeire }
and Lyons & Thomas } First Natl BK Bldg
Attorney for } Mobile, Ala.
Roberts Motor Co.

RECORDED

No.

APPEARANCE

vs.

Filed in Office

Aug. 16, 19*40*

R. S. Ditch

Clerk