

610

SUMMONS

STATE OF ALABAMA : IN THE CIRCUIT COURT
: LAW SIDE
BALDWIN COUNTY :

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

YOU ARE HEREBY COMMANDED to summon The Lewis Bear 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 to the Complaint of JOHNNY WILLIAMSON, a Minor, suing by and through his Mother, Mrs. Constance Williamson, as his next friend. Witness my hand this 6th day of September, 1940.

R. S. Duck
Clerk, Circuit Court, Baldwin County,
Alabama,
by Southall Thomas
as Deputy Clerk.

COMPLAINT

JOHNNY WILLIAMSON, a Minor,
suing by and through his
Mother, Mrs. Constance
Williamson, as his next friend,
Plaintiff,

At Law, No. _____

vs.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

The LEWIS BEAR COMPANY, a
Corporation,
Defendant.

Count One

The Plaintiff claims of the Defendant the sum of : FIFTY and no/100 Dollars (\$50.00), as damages, for that, heretofore on, to-wit: December 1, 1939, the Plaintiff was riding in an automobile on Temporary U. S. Highway No. 90, a public highway of the State of Alabama, between Lexley and Stapleton, in Baldwin County, Alabama, and then and there an agent or servant of the Defendant, while acting within the line and scope of his employment and duty as such agent or servant, negligently drove a truck of the Defendant upon and against the automobile in which the Plaintiff was riding; and the Plaintiff avers that as a direct and proximate consequence of the negligence as aforesaid, the Plaintiff was damaged in that he was greatly bruised and battered on his right arm, he suffered sundry bruises of the body, and he suffered physical pain and mental anguish for several days, all to his damage as aforesaid.

WHEREFORE, the Plaintiff sues.

Vincent F. Kilborn



Attorneys for the Plaintiff.

At Law,
Non-Record No. 610
RECORDED

JOHNNY WILLIAMSON, a minor,
suing by and through his mother,
Mrs. Constance Williamson, as
his next friend,
Plaintiff,

vs.

The
LEWIS BEAR COMPANY, a
Corporation,
Defendant.

SUMMONS AND COMPLAINT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

Filed in office this

6th day September, 1940.

R. S. Lee
Clerk,
by *Richard H. Murritt*
Deputy Clerk.

Vincent H. Kildorn and Jessie Hill

Service accepted and
further notice waived, this 6th day of September,
1940
The Lewis Bear Company,
a corporation
By *Richard H. Murritt*
J. B. T. Shalman
As its Attorneys.

