

MRS. TEXAS ELENORA SNELGROVE,
 Plaintiff,
 VS.
 ALBERT JOSEPH ALLEGRI,
 Defendant.

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

Now comes the Defendant and demurs to the Plaintiff's complaint and to each count thereof, separately and severally, and as ground for said demurrer says:

1. That said count does not state a cause of action.
2. For aught that appears the Plaintiff was guilty of negligence which proximately caused the injuries complained of.
3. That said count charges the act and not the injuries as being willful and wanton.

BEEBE & HALL,

By: *W. L. Hall*
 Attorneys for Defendant.

Defendant demands a trial by Jury.

BEEBE & HALL,

By: *W. L. Hall*
 Attorneys for Defendant.

8-446
RECORDED

DEMURRER

MRS. TEXAS ELENORA SNELLGROVE,
Plaintiff,

VS.

ALBERT JOSEPH ALLEGRI,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW.

*Filed March 4, 1940
R.S. Dwyer, Clerk*

MRS. TEXAS ELENORA
SNELGROVE,

Plaintiff,

VS.

ALBERT JOSEPH ALLEGRI,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

And now comes the Defendant, and for answer to the Plaintiff's complaint,
and to each count thereof, separately and severally, says:

1. That he is not guilty of the facts therein alleged.
2. That the facts therein alleged are untrue.

BEEBE & HALL,

By: *John Hall*
Attorneys for Defendant.

ANSWER:

MRS. TEXAS ELENORA SNELLGROVE,

Plaintiff,

VS.

ALBERT JOSEPH ALLEGRI,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW.

Filed August 22, 1940
W.S. Duck, Clerk

11 30
50 64
150
1630

45
41
65
390
2941

The State of Alabama, }
BALDWIN COUNTY

CIRCUIT COURT. (LAW)

—Term, 194—

No. 057 vs.

BILL OF COSTS

CLERK'S FEES:	AMOUNT	SUMMARY OF FEES, COSTS, AND JUDGMENT	AMOUNT
Fees in Circuit Court—		Fees and Costs in Circuit Court:	
Docketing Cause, One Fee only of.....	.25	Clerk's Fees	3800
Issuing Summ. and Complt., each.....	1.25	EX-Clerk's Fees	4145
Issuing Alias or Branch Summons & Complaint, each	1.25	Sheriff's Fees	2120
Making Copies Thereof, Minimum, each	.30	Ex-Sheriff's Fees	
Making Copies Thereof, over 200 Words, per 100 words	.15	Witness Fees	
Entering Sheriff's Returns, each	.20	Commissioner's Fees	
Entering Appearances, each	.20		
Certifying Affidavits, each	.25	Garnishee's Fees	
Issuing Attachments with Bond, each	1.00	Publisher's Fees	
Orders of Publication, each	.50		
Copy of Same, each	.50	Court Reporter's Fees, Per Day or fraction thereof	5.00
Issuing Summ. to Garnishee, each	.50	Trial Tax	3.00
Copy of Same, Per 100 Words	.15		
Swearing Garnishee, Etc., Per 100 words, .15, Minimum	.50		
Release of Garnishee, each	.25		
Issuing Scire Facias or Similar Notice, each	.75		
Copies of Same, Per 100 Words.....	.15		
Making Copy of Interrogatories, Per 100 Words, .15; Minimum	.50	Fees and Costs in Inferior Court:	
Commission to Take Depositions, each	.75	Clerk of Inferior Court Fees	
Filing Depositions, Each Pkg.,	.10	Sheriff's Fees	
Endorsing Each Package of Depositions Opened	.10	Justice of Peace Fees	
Issuing Subpoenas, Each	.30	Constable's Fees	
Issuing Witness Certificates, each.....	.25		
Entering Continuances, each	.10	Fees and Costs in Inferior Court	
Filing Papers, each	.10	Total Fees and Costs	5360
Other Orders of Court, each	.30	Judgment	
Trial and Incidents	.75	10 Per Cent Damages	
Entering Judgment, each	.30	Interest	
Complete Record, Per 100 Words	.15	Total Judgment	
Taking Bonds, each	.75	Total Fees, Costs and Judgment	
Certificate of Appeal	.25		
Transcript to Supreme Court, Per 100 Words	.15		
Additional Copies of Same, Per 100 Words	.05		
Issuing Executions or Copy Thereof, each	.50		
Entering Sheriff's Return, Per 100 Words, .15; Minimum	.20	Total	
.....			
Total Clerk's Fees	1750		
SHERIFF'S FEES:			
Serving and Returning Summons or Writ, each	1.50		
Levying Attachment, each	3.00		
Entering and Returning Same, each	.25		
Seizing Personal Property Under Writ of Detinue	3.00		
Taking and Approving Bonds, each.....	1.00		
Summoning Garnishee and Return, each	1.50		
Serving and Returning Sci. Fa. or Notice, Each	1.50		
Serving and Returning Subpoenas, each	.65		
Serving Contempt Attachment, each	1.50		
Impaneling Jury.....	.75		
Collecting Execution for Costs Only, each.....	1.50		
Coms. for Collecting Money on Executions			
Executing Writs of Possession, each.....	5.00		
Making Deed to Real Estate Sold, each,	2.50		
.....			
Total Sheriff's Fees	4115		

THE STATE OF ALABAMA,
Baldwin County.

No. 557

CIRCUIT COURT

FEBRUARY, 1940

193

To Any Sheriff of the State of Alabama:

You are hereby commanded to summon ALBERT JOSEPH ALLEGRI,

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

ALBERT JOSEPH ALLEGRI Defendant by MRS. TEXAS ELEANORA SNELLGROVE

Plaintiff

Witness my hand this 5th day of February, 1940 193

Clerk.

COMPLAINT

Plaintiff versus

The Plaintiff claims of the Defendant

Dollars, due by

HOWELL & JOHNSTON

Plaintiff's Attorney.

The State of Alabama,
Baldwin County

S. D. Page No. _____

CIRCUIT COURT

Case No. 337

Term, 1934

To Any Sheriff of the State of Alabama, Monroe Co.
GREETING:

YOU ARE HEREBY COMMANDED TO SUMMON

Pa. work
Monroeville, Ala.

if to be found in your County, at the instance of the

Welft -

to be and appear before the honorable, the Judge of the Circuit Court of Baldwin County, at the Court House thereof,

by 8:30 o'clock of the forenoon, on the 14th day of Nov 1934, and from day to

day and term to term of said Court until discharged by law, then and there to testify, and the truth to say, in a certain

cause pending, wherein

Mrs. Texas Snellgrove

Plaintiff

and

Albert J. Allegro

Defendant.

Herein fail not, and have you then and there this Writ.

Given under my hand and seal, this

24th

day of

Oct

1934

R. S. Duck

CLERK.

E

Received in office this _____ day of _____

193_____

SHERIFF

I have executed this writ _____

R.A. York

This 25th Oct. 1941

WR Stuart, Sheriff.

for M.B.N.

SHERIFF

ORIGINAL

No. 557

Page _____

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Mrs. Texas Snellgrove

Plaintiff

VS.

Albert J. Allegri

Defendant

CIVIL SUBPOENA

Issued this 24th day of

Oct

1931

R. S. Luck

Clerk.

The State of Alabama,
Baldwin County

S. D. Page No. _____

CIRCUIT COURT

Case No. 557

Spring 1941

Term, 193

To Any Sheriff of the State of Alabama, GREETING:

YOU ARE HEREBY COMMANDED TO SUMMON R. A. York

if to be found in your County, at the instance of the plaintiff

to be and appear before the honorable, the Judge of the Circuit Court of Baldwin County, at the Court House thereof,
by 8:30 o'clock of the forenoon, on the 17th day of April 1941 193 , and from day to

day and term to term of said Court until discharged by law, then and there to testify, and the truth to say, in a certain

cause pending, wherein Mrs. Texas E. Snellgrove Plaintiff

and Albert Joseph Allegri Defendant.

Herein fail not, and have you then and there this Writ.

Given under my hand and seal, this 2nd day of April 1941, 193

R. S. Shuck

CLERK.

Received in office this _____ day of

April

193*4*

W R Stuart

SHERIFF

I have executed this writ

by executing

a copy to

NA York

*53
53
61*

This is

copy of

April 1941

J P Jordan

SHERIFF

ORIGINAL

No: 557

Page

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Mrs. Texas E. Snellgrove

Plaintiff

VS.

Albert Joseph Allegri

Defendant

CIVIL SUBPOENA

Issued this _____ day of

193

Clerk.

THE STATE OF ALABAMA
BALDWIN COUNTY

} Case No. 557
CIRCUIT COURT
Fall Term, 1941

To any Sheriff of the State of Alabama, GREETING:

LP 31
You are hereby commanded to summon Bill White

if to be found in your County, at the instance of the Plaintiff

to be and appear before the honorable, the Judge of the Circuit Court of Baldwin County, at the Court House there-

of, by 8:30 o'clock of the forenoon, on the 4th day of November, 1941

and from day to day and term to term of said Court until discharged by law, then and there to testify, and

the truth to say, in a certain cause pending, wherein Mrs Texas Snellgrove Plaintiff

and Albert J. Allegri Defendant.

Herein fail not and have you then and there this Writ.

Given under my hand and seal, this 24th day of October, 1941

R.S. Duck Clerk

Received in office this 31 day of

October
W. H. Snellgrove
Bill White SHERIFF

I have executed this writ

By Bill White
307 Rapier Ave.
Mobile Alabama

Executed by serving copies
on all witnesses by whose names
is an X mark and leaving copies
for all witnesses checked
W. H. Snellgrove, Sr., Sheriff

SHERIFF

ORIGINAL

No. 557

Page

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Mrs Texas Snellgrove

Plaintiff

VS.

Albert J. Allegri

Defendant

CIVIL SUBPOENA

Issued this _____ day of

194

Clerk.

The State of Alabama,
Baldwin County

S. D. Page No. _____

Case No. 5537

CIRCUIT COURT

Term, 1934

To Any Sheriff of the State of Alabama, GREETING:

YOU ARE HEREBY COMMANDED TO SUMMON

Maurice W. Castle

if to be found in your County, at the instance of the

Pelt

to be and appear before the honorable, the Judge of the Circuit Court of Baldwin County, at the Court House thereof,

by 830 o'clock of the forenoon, on the 12 day of Sept, 1934, and from day to

day and term to term of said Court until discharged by law, then and there to testify, and the truth to say, in a certain

cause pending, wherein

Mrs. Lysa E. Sullivan

Plaintiff

and

R. J. Allergic

Defendant.

Herein fail not, and have you then and there this Writ.

Given under my hand and seal, this

12

day of

Sept

, 193

4

R. Duck

CLERK.

Received in office this 19th day of

Sept

19340

W R Stuart

SHERIFF

I have executed this writ

9/12/40

Maurice W. Castle

W R Stuart Sheriff
M. B. Hamilton

SHERIFF

ORIGINAL

No.

557

Page

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Smullman

Plaintiff

VS.

Alligui

Defendant

CIVIL SUBPOENA

Issued this _____ day of

193

Clerk.

The State of Alabama,
Baldwin County

S. D. Page No. _____

Case No. 557

557 CIRCUIT COURT

Fall

Term, 1940

To Any Sheriff of the State of Alabama, GREETING:

YOU ARE HEREBY COMMANDED TO SUMMON _____

R. A. York

if to be found in your County, at the instance of the _____

plaintiff

to be and appear before the honorable, the Judge of the Circuit Court of Baldwin County, at the Court House thereof,

by 8:30 o'clock of the forenoon, on the 11 day of September, 1940, and from day to

day and term to term of said Court until discharged by law, then and there to testify, and the truth to say, in a certain

cause pending, wherein _____

Mrs. Gerda E. Snellgrove

Plaintiff

and _____

Albert Jos. Alligui

Defendant.

Herein fail not, and have you then and there this Writ.

Given under my hand and seal, this _____

6

day of _____

September

, 1940

R. S. Durr

CLERK.

Received in office this 6 day of

Sept 1940

W R Stewart
SHERIFF

I have executed this writ

by serving
a copy of within summons
on

R. A. York

ORIGINAL

No. 557

Page

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Mrs. Texas E. Snellgrove

Plaintiff

VS.

Albert Gos. Allegri

Defendant

CIVIL SUBPOENA

Issued this _____ day of

193

Clerk

SHERIFF

Mobile County

CIVIL SUBPOENA—ORIGINAL—In case witness shall wish to charge for attendance, he shall produce to the Clerk in term this Subpoena, or within five days after adjournment of Court, else he will be barred
Moore Printing Co. Bay Minette, Ala.

The State of Alabama, }
Baldwin County

S. D. Page No. _____

CIRCUIT COURT

Case No. 557

Spring 1941

Term, 193_____

To Any Sheriff of the State of Alabama, GREETING:

YOU ARE HEREBY COMMANDED TO SUMMON Dr. Edward J. Reneke, Eric Blackson

if to be found in your County, at the instance of the plaintiff

to be and appear before the honorable, the Judge of the Circuit Court of Baldwin County, at the Court House thereof,

by 8:30 o'clock of the forenoon, on the 17th day of April 1941 193____, and from day to

day and term to term of said Court until discharged by law, then and there to testify, and the truth to say, in a certain

cause pending, wherein Mrs. Texas E. Snellgrove Plaintiff

and Albert Joseph Allegre Defendant.

Herein fail not, and have you then and there this Writ.

Given under my hand and seal, this 2nd day of April 1941, 193_____

R. S. Black CLERK.

6

Received in office this _____ day of

194

SHERIFF

I have executed this writ

*My Service
of Copy on
J. C. West*

10/20/41

J. B. [Signature]
SHERIFF

Manuel Co

ORIGINAL

No. *557*

Page _____

THE STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Mrs. L. S. Hillgrove

Plaintiff

VS.

Albert J. Allegre

Defendant

CIVIL SUBPOENA

Issued this

24

day of

Oct

194

R. S. [Signature]
Clerk.

THE STATE OF ALABAMA
BALDWIN COUNTY

} Case No.

557

CIRCUIT COURT

Term, 1941

To any Sheriff of the State of Alabama, GREETING:

You are hereby commanded to summon

R A Clark

if to be found in your County, at the instance of the

Phil W. Bankwell

to be and appear before the honorable, the Judge of the Circuit Court of Baldwin County, at the Court House there-

of, by 830 o'clock of the forenoon, on the 4 day of March, 1941

and from day to day and term to term of said Court until discharged by law, then and there to testify, and

the truth to say, in a certain cause pending, wherein

Miss L. G. Smiley

Plaintiff

and

Albert J. Allie

Defendant.

Herein fail not and have you then and there this Writ.

Given under my hand and seal, this

24

day of

Oct

1941

R. S. L. L. L.

Clerk

Received in office this 4/1/41 day of

193

W R Stuart

SHERIFF

I have executed this writ

Executed by serving copies on
all witnesses by whose names is
an X marked and leaving copies for
all witnesses checked.

W. H. Holcombe, Sr., Sheriff

by J. W. Wachter

SHERIFF

4/8/316 ✓
ORIGINAL

No. 557

Page

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Mrs. Texas E. Snellgrove

Plaintiff

VS.

Albert Joseph Allegri

Defendant

CIVIL SUBPOENA

Issued this _____ day of

193

Clerk.

✓ CW

2. The Court charges the jury that this is a suit commenced by assignees of a mortgagee against the mortgagor. In such case it is your duty to ascertain if there is any mortgage debt and if so to then ascertain the amount thereof. If you find a debt to be due and it is ascertained to be less than the value of the property sued for as assessed by you, judgment must be rendered by you for the property sued for, or if it is not to be had, then for the amount of the debt as ascertained by you.

is Semper Refused

J. W. Hare
Judge

To all the Friends of Harman
Salutation

is Semper Refused

THE STATE OF ALABAMA
BALDWIN COUNTY

} Case No. 557

CIRCUIT COURT
Term, 1941

To any Sheriff of the State of Alabama, GREETING:

You are hereby commanded to summon

~~Etch~~ ¹²⁸ Edward Runkle
¹²⁹ Eric Blackman
if to be found in your County, at the instance of the

to be and appear before the honorable, the Judge of the Circuit Court of Baldwin County, at the Court House there-

of, by 830 o'clock of the forenoon, on the 4th day of June, 1941

and from day to day and term to term of said Court until discharged by law, then and there to testify, and

the truth to say, in a certain cause pending, wherein

and

Max T. Sullivan Plaintiff
Albert J. Allgren Defendant.

Herein fail not and have you then and there this Writ.

Given under my hand and seal, this 24 day of Oct, 1941

Radual

Clerk

Received in office this _____ day of

194

SHERIFF

I have executed this writ

Executed by serving copies
on all witnesses by whose name
is an X mark and leaving copies
for all witnesses checked ✓
By J. H. Eckhardt, Sr., Sheriff
M. Burnette, D.S.

SHERIFF

42w Mahalee Co
178
178
ORIGINAL
No. 557

Page

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Mrs Liza Sullivan

Plaintiff

VS.

Robert J. Allegri

Defendant

CIVIL SUBPOENA

Issued this 24 day of

194

RF Deane
Clerk.

The State of Alabama,
Baldwin County

S. D. Page No. _____

CIRCUIT COURT

Case No. 557

Nov

Term, 1934

To Any Sheriff of the State of Alabama, GREETING:

YOU ARE HEREBY COMMANDED TO SUMMON

~~James Taylor~~ Pate Commissioner
Claude Murray, Cecil Owens, Ernest Taylor, Frances
Frances Taylor, Ben and Douglas, Ethel Yelling,
Mabel Yelling

if to be found in your County, at the instance of the

Pltf.

to be and appear before the honorable, the Judge of the Circuit Court of Baldwin County, at the Court House thereof,

by 8:30 o'clock of the forenoon, on the 4 day of Nov 1934, and from day to

day and term to term of said Court until discharged by law, then and there to testify, and the truth to say, in a certain

cause pending, wherein Mrs Texas Snellgrove Plaintiff

and Albert J. Allighi Defendant.

Herein fail not, and have you then and there this Writ.

Given under my hand and seal, this 9th day of Oct, 1934

R. S. Duck

CLERK.

Received in office this 24 day of

October

1934

W. R. Stuart

By M. B. Hamilton SHERIFF

I have executed this writ

Pro. Con. 10/30/41

Claude Yancey

Ernest Taylor

Francis Taylor

James Douglas

Ethel Yalving

Mabel Yalving

W. R. Stuart

SHERIFF

ORIGINAL

No. 557

Page

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Mrs. Texas Snellgrove

Plaintiff

VS.

Albert J. Alleyri

Defendant

CIVIL SUBPOENA

Issued this

24th

day of

Oct

1934

R. S. Duck

Clerk.

#2

I Charge you, gentlemen of the jury, that if you believe from the evidence in this case that the car in which the plaintiffs were riding ^{did not} approached the intersection at which the alleged accident at a careful and prudent speed not greater than is reasonable and proper, having due regard to the traffic, surface and width of the highway and of any other conditions then existing and that the failure of the car in which they were riding to approach the intersection was the proximate cause of the accident, the plaintiffs cannot recover.

Refused
F. W. Ware
Judge