

STATE OF ALABAMA)
COUNTY OF BALDWIN)

PAUL JAMES HENDERSON,)
PLAINTIFF.)
VS)
ALBERT JOSEPH ALLEGRI,)
DEFENDANT.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW. NO.....

COMPLAINT

COUNT ONE-

The plaintiff claims of the defendant the sum of Five Hundred (\$500.00) Dollars as damages, for that heretofore, on to-wit, the 31st day of December, 1939, the defendant so negligently operated an automobile at or near the intersection of a public highway and U. S. Highway number 90, a public highway, said intersection being near the farm of Jason Malbis and approximately four and five tenths (4.5) miles east of the intersection of U. S. Highways number 90 and 31, in Baldwin County, Alabama, that the same was caused to collide with, run upon, or against plaintiff's automobile while plaintiff's automobile was then and there traveling east on or upon said U. S. Highway number 90 and crossing or attempting to cross said intersection, and as a proximate consequence thereof, plaintiff's said automobile was greatly broken, bent, injured, and damaged in the amount aforesaid; hence this suit.

COUT TWO-

~~Plaintiff claims of the defendant the sum of Five~~
Hundred (\$500.00) Dollars as damages , for that heretofore, on to-wit, the 31st day of December, 1939, the defendant was driving an automobile at or near the intersection of a public highway and U. S. Highway number 90, a public highway, said intersection being near the farm of Jason Malbis and approximately four and five tenths (4.5) miles east of the intersection of U. S. Highways number 90 and 31, in Baldwin County, Alabama, carelessly and heedlessly in wilful or wanton disregard of the rights or safety of others and with knowledge that he would very

likely injure or damage the persons or property of others thereby, so wilfully or wantonly operated same as to cause it to collide with, run upon, or against plaintiff's automobile while plaintiff's automobile was then and there traveling east on or upon said U. S. Highway number 90 and crossing or attempting to cross said intersection, and as a proximate consequence thereof, plaintiff's said automobile was greatly broken, bent, injured, and damaged in the amount aforesaid; hence this suit.

Howell + Johnston
ATTORNEYS FOR PLAINTIFF

Defendant's address:

Daphne,
Baldwin County, Alabama.

Received in Sheriff Office
this 6th day of February 1940
W. H. Stuart Sheriff

*Executed this 7th
day of Feb - 1940 by
Serving a copy of
Within Summons on
Joseph Albert Joseph Allegri*

*W. H. Stuart
Sheriff*

*By: B. H. Spencer
D.S.*

RECORDED

558

SUMMONS AND COMPLAINT

PAUL JAMES HENDERSON,
Plaintiff,

Vs.

ALBERT JOSEPH ALLEGRI,
Defendant.

Dugan

Filed this 5th day February 1940

R. S. Dugan
Clerk-Recorder

THE STATE OF ALABAMA,
Baldwin County.

No. 558 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

PAUL JAMES RENDERSO

Plaintiff

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

R.S. Dack Clerk.
By - H. L. Thompson, Deputy

COMPLAINT

Plaintiff versus

The Plaintiff claims of the Defendant

Dollars, due by

HOWELL & JOHNSTON

Plaintiff's Attorney.

No. _____

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

Paul J. Henderson

VS,

PLAINTIFF

Albert Joseph Allegri

DEFENDANT

Summons and Complaint

Filed, _____ 193__

Clerk.

Defendant Lives at

Plaintiff's Attorney.

Defendant's Attorney:

MOORE PRINTING CO., BAY MINETTE, ALA.

RECEIVED IN OFFICE

193

Sheriff

I have executed this Writ

this 1993

by leaving a copy of the within Summons and Complaint with

We the jury find
for the plaintiff
and assess
the damages
at \$150.00

Signed
J. B. Smith
Foreman

PAUL JAMES HENDERSON,
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: 
Attorneys for Defendant.

Defendant demands a trial by Jury.

BEEBE & HALL,

By: 
Attorneys for Defendant.

RECORDED

8-446

DECURER:

PAUL JAMES HENDERSON,

Plaintiff,

VS.

ALBERT JOSEPH ALLEGRI,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

*Filed March 4, 1940
R.S. Ditch, Register-Clark*

PAUL JAMES HENDERSON,

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.

5-8-8

ANSWER:

PAUL JAMES HENDERSON,

Plaintiff,

VS.

ALBERT JOSEPH ALLGRI,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW.

*Filed August 22, 1940
R.S. Black, Clerk*

THE STATE OF ALABAMA,
Baldwin County.

No. 559

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

WILLIAM SPIRGIN SNEELGROVE

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.

STATE OF ALABAMA)
COUNTY OF BALDWIN)

WILLIAM SPIRGIN SNELLGROVE,)
PLAINTIFF.)

VS)

ALBERT JOSEPH ALLEGRI,)
DEFENDANT.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
AT LAW. NO.....

COMPLAINT

COUNT ONE-

The plaintiff claims of the defendant the sum of Twenty-five Hundred (\$2500.00) Dollars as damages, for that heretofore, on to-wit, the 31st day of December, 1939, the defendant so negligently operated an automobile at or near the intersection of a public highway and U. S. Highway number 90, a public highway, said intersection being near the farm of Jason Malbis and approximately four and five tenths (4.5) miles east of the intersection of U. S. Highways number 90 and 31, in Baldwin County, Alabama, that the same was caused to collide with, run upon, or against an automobile in which plaintiff was riding while said automobile was then and there traveling east on or upon said U. S. Highway number 90 and crossing or attempting to cross said intersection, and as a proximate consequence thereof, plaintiff was severely bruised, cut, and disfigured, was caused to suffer mental and physical pain, suffering, and shock, and caused to incur large expense by way of doctor's bills and medicine, and was caused to lose a great deal of time from his business or work, all to his damage as aforesaid.

COUNT TWO-

Plaintiff claims of the defendant the sum of Twenty-five Hundred (\$2500.00) Dollars as damages, for that heretofore, on to-wit, the 31st day of December, 1939, the defendant was driving an automobile at or near the intersection of a public highway and U. S. Highway number 90, a public highway, said intersection being near the farm of Jason Malbis and approximately

ately four and five tenths (4.5) miles east of the intersection of U. S. Highways number 90 and 31, in Baldwin County, Alabama, carelessly and heedlessly in wilful or wanton disregard of the rights or safety of others and with knowledge that he would very likely injure or damage the persons or property of others thereby, so wilfully or wantonly operated same as to cause it to collide with, run upon, or against an automobile, in which plaintiff was riding while said automobile was then and there traveling east on or upon said U. S. Highway number 90 and crossing or attempting to cross said intersection, and as a proximate consequence thereof, plaintiff was severely bruised, cut, and disfigured, was caused to suffer mental and physical pain, suffering, and shock, and caused to incur large expense by way of doctor's bills and medicine, and was caused to lose a great deal of time from his business or work, all to his damage as aforesaid.

Hewell & Johnston
ATTORNEYS FOR PLAINTIFF

Defendant's address:

Daphne,

Baldwin County, Alabama.

We the Jury
find for the
Plaintiff
and assess the
Damage at \$100.00
Signed
J.B. Smith

RECORDED 559

SUMMONS & COMPLAINT.

WILLIAM SPITVIN SHELLEGROVE,
Plaintiff

vs.

ALBERT JOSEPH ALLEGRI
Defendant.

Filed this 5th day of January, 1940

R. S. Duck

Clerk-Registrar

Received in Sheriff Office
this 6th day February 1940
W.B. Stuart Sheriff

Executed this 7th
day of Feb. 1940 by
Serving a copy of this
Summons on
Albert Joseph Allegri

W.B. Stuart
Sheriff

By B. H. Hansen
Dd.

WILLIAM SPIRGIN SNELLGROVE,

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: J. M. Hall
Attorneys for Defendant.

ANSWER:

WILLIAM SPIRGIN SNEELGROVE,
Plaintiff,

VS.

ALBERT JOSEPH ALLEGRI,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW.

*Filed August 23, 1940
R.S. Duck, Clerk*

The State of Alabama,
Baldwin County

S. D. Page No. _____
Case No. 559

CIRCUIT COURT
Fall Term, 19340

To Any Sheriff of the State of Alabama, GREETING:

YOU ARE HEREBY COMMANDED TO SUMMON Bill White, Pete Cometti, Claude

Yoncey, Joe Cometti, Cecil Owen

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

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 11th 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 Wm. S. 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 31st day of August, 1940, 19340

H. S. Durb

CLERK.

Received in Sheriff's Office

this 31 day of Aug, 1940

W. R. STUART, Sheriff

Received in office this _____ day of _____

193

SHERIFF

I have executed this writ

*This 31st day of Sept 1940
by serving a copy of
return summonses
on Bill White
Pete Cornette Jue.
Cornette Claude Yancey*

SHERIFF

ORIGINAL

No. 559

Page _____

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

WM. S. SNELLGROVE,

Plaintiff

VS.

ALBERT J. ALLEGRI

Defendant

CIVIL SUBPOENA

Issued this _____ day of _____

193

Clerk.

The State of Alabama,
Baldwin County

S. D. Page No. _____

CIRCUIT COURT

Case No. 559

Fall Term, 1940

To Any Sheriff of the State of Alabama, GREETING:

YOU ARE HEREBY COMMANDED TO SUMMON

Theresa Taylor, Florence Davis,
Mary Frances Knight, Senior Daughters, Ethel Yelling,
Maybelle Yelling, R. A. York, Ernest Taylor

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

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 Wm. Spurgeon Snellgrove Plaintiff

and Albert J. Allegre Defendant.

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

Given under my hand and seal, this 9 day of Sept, 1940

R. S. Duch CLERK.

Received in office this 9th day of

Sept

1940

W.R. Stuart

SHERIFF

I have executed this writ

~~Matthew S. Smith~~

Theresa Taylor

Florence Davis

Mary Frances Knight

Samson Douglas

Ethel Yelling

Mabel Yelling

A. G. York

ORIGINAL

No. 559

Page

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Wm S. Smellguan

Plaintiff

VS.

Albert J. Allgren

Defendant

CIVIL SUBPOENA

Issued this _____ day of

193

Clerk.

W.R. Stuart

SHERIFF

Per M.B.D.

The State of Alabama,
Baldwin County

S. D. Page No. _____

CIRCUIT COURT

Case No. 559

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 defendant

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 Wm. E. 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 27 day of March, 1941/ 193____

R. S. Duck

CLERK.

Received in office this _____ day of

193

SHERIFF

I have executed this writ

8 day April
10 AM
by Sheriff
Copy to
RA [unclear]

SHERIFF

Monroe County

ORIGINAL

No. 559

Page

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Wm. E. Snellgrove,

#####

Plaintiff

VS.

Albert J. Allegri

Defendant

CIVIL SUBPOENA

Issued this _____ day of

193

Clerk.

The State of Alabama,
Baldwin County

S. D. Page No. _____

Case No. 559

CIRCUIT COURT

Spring, 1941

Term, 193

To Any Sheriff of the State of Alabama, GREETING:

YOU ARE HEREBY COMMANDED TO SUMMON Bill White, Pete Commetti, Claude Yancy,

Cecil Owen, Ernest Taylor, Theresa Taylor, Florence Davis, Mary Francis

Knight, Senior Douglas, Ethel Yelling, Maybelle Yelling,

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

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 William Spirgin 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 27th day of March, 1941, 193

H. S. Dush

CLERK.

Received in office this 27th day of

March

1934

W.R. Stuart

Mar 27th

SHERIFF

I have executed this writ

this 4th day of apr.

1941 by serving a copy of
writ on

Mabel Gelling

Ethel Gelling

Ernest Taylor

Theresa Taylor

Pete Commette 4-12-

Claude Janey

Senior Douglas

Thomas Davis

Bill White

W.R. Stuart

By Kenna T. Hammett

SHERIFF

ORIGINAL

No. 559

Page

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

William Spirgin Snellgrove,

Plaintiff

VS.

Albert Joseph Allegri, Dugme

Defendant

CIVIL SUBPOENA

Issued this 27th day of

March, 1941

193

Clerk.

WILLIAM SPIRGIN 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: [Signature]
Attorneys for Defendant.

Defendant demands a trial by Jury.

BEEBE & HALL,

By: [Signature]
Attorneys for Defendant.

8-443
RECORDED

DEMRER:

WILLIAM SPIRGIN SHELIGROVE,

Plaintiff,

VS.

ALBERT JOSEPH ALLGRI,

Defendant.

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

Filed March 4, 1940
R.S. Dunch, Clerk

THE STATE OF ALABAMA, Baldwin County.
TO ANY SHERIFF OF THE STATE OF ALABAMA—GREETINGS:

S. D. Page No. _____
Case No. 559 Fall Term, 1940

CIRCUIT COURT

YOU ARE HEREBY COMMANDED TO SUMMON

Cecil Owens not found

if to be found in your County, at the instance of the Defendant
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 Wm. S. Snellgrove Plaintiff and Albert J. Allegre Defendant.
Herein fail not, and have you then and there this Writ.

Given under my hand and seal, this 31 day of Aug 1940

R. S. Duck

THE STATE OF ALABAMA, Baldwin County.
TO ANY SHERIFF OF THE STATE OF ALABAMA—GREETINGS:

S. D. Page No. _____
Case No. 559 Spring Term, 1941

CIRCUIT COURT

YOU ARE HEREBY COMMANDED TO SUMMON

Mary Francis Knight

if to be found in your County, at the instance of the Defendant
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 17 day of April 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 Wm. S. Snellgrove Plaintiff and Albert J. Allegre Defendant.
Herein fail not, and have you then and there this Writ.

Given under my hand and seal, this 27 day of March 1941

R. S. Duck

CLERK

THE STATE OF ALABAMA, Baldwin County.
TO ANY SHERIFF OF THE STATE OF ALABAMA—GREETINGS:

S. D. Page No. _____
Case No. 559 Spring Term, 1941

CIRCUIT COURT

YOU ARE HEREBY COMMANDED TO SUMMON

Cecil Owens

if to be found in your County, at the instance of the Defendant
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 17 day of April 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 Wm. S. Snellgrove Plaintiff and Albert J. Allegre Defendant.
Herein fail not, and have you then and there this Writ.

Given under my hand and seal, this 27 day of March 1941

R. S. Duck

CLERK

Morgan vs. Allegri - Donaghy

JURY LIST — FALL TERM — FIRST WEEK

November 3, 1941

- ~~1. Tillman Allen, Farmer, Gateswood. P1~~
2. George W. Miller, Laborer, Bay Minette.
- ~~3. Lester D. Linden, Farmer, Silverhill. 26~~
- ~~4. John T. Hadley, Laborer, Foley.~~
5. Thomas S. Bryars, Farmer, Latham.
6. Thomas B. McGowan, Cattleman, Tensaw.
7. Silas D. Powers, Farmer, Bon Secour.
- ~~8. Walter T. Nall, Farmer, Foley. 270~~
- ~~9. William G. Hobbs, Filling Station Operator, Bay Minette.~~
- ~~10. Ernest D. Corte, Produce, Daphne. P6~~
- ~~11. Mack Aylin, Forrester, Bay Minette. 241~~
12. Joseph B. Smith, Surveyor, Tensaw.
13. Charles J. Ebert, Real Estate, Foley.
- ~~14. Walter M. Richerson, Merchant, Stockton. P7~~
- ~~15. Harold J. Miller, Mechanic, Fairhope. P10~~
- ~~16. Frank T. Peterson, Farmer, Gateswood. 211/11/11/11/1~~
- ~~17. Daniel Hall, Farmer, Tensaw. 21~~
- ~~18. Thomas R. Dean, Farmer, Rabon. P2~~
- ~~19. Ernest A. Stuart, Cleaner and Presser, Bay Minette. 25~~
20. Emmett Howell, Turpentine, Foley.
- ~~21. Frank A. McKenzie, Farmer, Fairhope. P3~~
- ~~22. Young A. Cox, Merchant, Stockton. 22~~
- ~~23. John Lindsey, Machinist, Foley.~~
24. Hunter H. Mixon, Hardware, Bay Minette.
25. La Velle Ferguson Jr., Timber, Latham.
- ~~26. John E. Smith, Filling Station Operator, Bay Minette. 24~~
- ~~27. William A. Vines, Turpentine Operator, Bay Minette. 28~~
- ~~28. Leonard J. Hooper, Newport, Bay Minette.~~
- ~~29. P. Grey Gano, Oil Agent, Bay Minette.~~
- ~~30. Jesse W. Joyner, Filling Station Operator, Bay Minette. 27~~
- ~~31. John N. Standard, Merchant, Bay Minette. 29~~
- ~~32. L. Frank Knowles, Newport, Bay Minette. P1~~
- ~~33. Clyde N. Little, Mechanic, Bay Minette. P11~~
- ~~34. Virgil V. Rhodes, Dairyman, Bay Minette. 23~~
35. Jesse M. Smith, Real Estate, Bay Minette.
- ~~36. Neal H. McDuffie, Cafe Operator, Bay Minette.~~
37. Clinton L. White, Cashier, Bay Minette.
- ~~38. Norville Lee Cabaniss, Farmer, Bay Minette. P5~~
- ~~39. Alfred Billy, Barber, Bay Minette. P4~~
40. Harry T. Corley, Dairyman, Bay Minette.

41 *Geo J Bure Ochoa Bayminette*