

MRS.	WILLY MAE HENDERSON,)	IN THE CIRCUIT	r court of
	Plaintiff,		BALDWIN COUNT	Y. ALABAMA.
	VS.		000000000000000000000000000000000000000	
ALBER	T JOSEPH ALLEGRI, Defendant.		AI TA	

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,

Attorneys for Defendant.

ANSWER.

MRS. WILLY MAE HENDERSON,

Plaintiff,

VS.

ALBERT JOSEPH ALLEGRI,

Defendant.

IN THE CIRCUIT COURT OF

BALDITIN COUNTY, ALABAHA,

AT LAW.

Find Chaput 22,1940

MRS. WILLY MAE HENDERSON,) IN THE CIRCUIT COURT OF
Plaintiff,) BALDWIN COUNTY, ALABAMA
VS.) . DESTRUCTE COORTI, MINISTERINA
ALBERT JOSEPH ALLEGRI,	AT LAW.
Defendant	

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

Attorneys for Defendant

Defendant demands a trial by Jury.

BEEBE & HALL

Attornate for Defordent

DENORKES

MRS. WILLY MAE HENDERSON,
Plaintiff,

VS.

ALBERT JOSEPH ALLEGRI,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

Field March 4/540 R.S. Duch, Ryster-Cler

THE STATE OF A	- >	No. 560	CIRCUIT	r court	
Baldwin Coun	y		bruary, 194 9		
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to appear and plead, answer or d	amur within thirty	day from the ser	rice hereof to the	Complaint filed	in
	·		and the state of t		
the Circuit Court of Baldwin Con	inty, State of Alaba Defendant				· • • · · · · · · · · · · · · · · · · ·
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Witness my hand this	th day of.	february,	1940 193		
		R.S. Duch		Clerk.	
	COM	PLAINT			
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The Plaintiff claims of the	e Defendant				
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				Dollars, due	ру

Deputy Sherm		MOORE PRINTING CO., BAY MINETTE, ALA.
ō		Defendant's Attorney
Sheriff.		
N. S., S. C. F. S. B.		Plaintiff's Attorney,
		Defendant Lives at
	70.00	Clerk.
		193
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Sheriff		IRCUIT COURT
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STATE OF ALABAMA)
COUNTY OF BALDWIN)

MRS. WILLY MAE 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 Thousand (\$5,000.00) 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 the 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 seriously and permanently injured, one of her ankles was fractured, she was caused to suffer mental and physical pain, suffering, and shock, and that she incurred large expense by way of doctor's bills and medicine, and was caused to lose a great deal of time from her business or work, all to her damage as aforesaid; hence this suit. COUNT TWO-

Plaintiff claims of the defendant the sum of Five Thousand (\$5,000.00) 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 an automobile in which plaintiff was riding and which 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 seriously and permanently injured, one of her ankles was fractured, she was caused to suffer mental and physical pain, suffering, and shock, and that she incurred large expense by way of doctor's bills and medicine, and was caused to lose a great deal of time from her business or work, all to her damage as aforesaid; hence this suit.

ATTORNEYS FOR PLAINTIFF

Defendant's address:

Daphne, Baldwin County, Alabama.

SUMMONS & CONFLAIM.

RECORDE

The Me Me Manager of the state of the state

A THE PROPERTY OF THE PARTY OF

MRS. WILLY MAE HENDERSON)

Plaintiff)

VS.

ALBERT JOSEPH ALLEGRI)

Defendant)

TO R. S. DUCK, CLERK OF SAID COURT.

A judgment was rendered in the above styled cause on November 4, 1941, in favor of the Plaintiff and against the Defendant for the sum of \$500.00 and costs of court and an execution was issued by you upon such judgment against the Defendant who resides in this State and such execution was returned, "no property found";

Albert Joseph Allegri requiring him to file in the Circuit Court of Baldwin County, Alabama, within thirty days from the service of said notice, a statement in writing, under eath, of all of his assets, including money, choses in action, notes, bonds, and accounts, and all other property, real, personal, or mixed, or any interest therein, with a detailed discription of the same, the location and reasonable value of each item thereof, together with a detailed list or statement, of any and all liens, mortgage, or encumbrances thereon showing the amount due upon each, and the owner or holder of such liens, encumbrances or mortgage, all as required by section 903-907 of Title 7 of the 1940 Code of State of Alabama.

EEQUEST FOR DISCOURTY OF ASSETTS

PARTHURA JOSEPH ALLEGRI

VAS.

PARTHURAN JOSEPH ALLEGRI

PARTHURAN JOSEPH ALLE

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A judgasna vas rendered in the above stried cause

on November 4, 1941, in favor of the Plaintiff and against the Defendant for the own of \$500.00 and costs of court and an execution was hasusd by you upon such judyasub against the Defendant sho resides in this Chate and anch execution was returned, "no property founds; Tou and hereby requested to best a notice to

Beldwin County, Alabama, within thirty days from the service of said · , exects 201 To LIS to , fine medin , putt inv mi vicentista a , estion including money, choses in spilon, notes, bonds, and nocunity and all other property, real, personal, or mixed, or any interest therein. with a detailed disoription of the same, the location and reasonable value of each item thereof, together with a detailed list or state-Raisers are and sliftens, morege, or enoughness the greek transfer and are rethe author the upon each, and the owner or helder of such liene; enoundrences or nortgage, all as required by section 903-907 of fittis

the 1940 Opte of State of Alabans. imedmestred to yes BALDWIN COUNTY, ALABAMA IN THE CIRCUIT COURT OF ALBERT JOSEPH ALLEGRI day of September, 1946 Defendant

REQUEST FOR DISCOVERY OF ASSETS

MRS. WILLY MAE HENDERSON

Plaintiff

VS.

MRS. WILLY MAE HENDERSON)

IN THE CIRCUIT COURT OF

Plaintiff)

BALDWIN COUNTY, ALABAMA

ALBERT JOSEPH ALLEGRI)

Defendant)

TO R. S. DUCK, CLERK OF SAID COURT.

A judgment was rendered in the above styled cause on November 4, 1941, in favor of the Plaintiff and against the Defendant for the sum of \$500.00 and costs of court and an execution was issued by you upon such judgment against the Defendant who resides in this State and such execution was returned, "no property found";

You are hereby requested to issue a notice to albert Joseph Allegri requiring him to file in the Circuit Court of Baldwin County, Alabama, within thirty days from the service of said notice, a statement in writing, under oath, of all of his assets, including money, choses in action, notes, bonds, and accounts, and all other property, real, personal, or mixed, or any interest therein, with a detailed discription of the same, the location and reasonable value of each item thereof, together with a detailed list or statement, of any and all liens, mortgage, or encumbrances thereon showing the amount due upon each, and the owner or holder of such liens, encumbrances or mortgage, all as required by section 903-907 of Title 7 of the 1940 Code of State of Alabama.

Dated this _____ day of September, 1946.

WILLY MAE HENDERSON

As her attorneys of record

Filed 200 day of September, 194

BALDWIN COUNTY, ALABAMA

ALBERT JOSEPH ALLEGRI vs. Defendant

WILLY MAE HENDERSON Plaintiff

REQUEST FOR DISCOVERY OF ASSETS

NI THE CIRCUIT COURT OF

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merigange, all as required by section 900-90% of pickle Non sach, and the owner or holder of such lians, on enoughtenose thereon chertag eny and eli lions, mortgage, of and files thereof, together with a detailed list or state-The location and resconsists detailed disoription of the same, property, real, personal, or almed, or any interset thoreta, grojograd roselt groses ja seljert rogset Action, a statement in whiches.

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WILLBY MAR HENDERSON

PLAINTIFF

775

ALBERT JOSEPH ALLEGRI

DE FENDANT

IN THE CIRCUIT COURT OF PALDUM COUNTY, ALADAMA,

Now nomes the Defendant and for answer to the written request filed by the Plaintiff in the Circuit Court of Baldwin County, Alabama, says:

That he has no assets, money, choses in action, bonds, accounts, real, personal or mixed property, that all property used or enjoyed by him belongs to his mother.

Alfort Jaseph allgs.

STATE OF ALABAMA)

BALDWIN COUNTY)

Personally appeared before me Albert Joseph Allegri, and who having been by me first duly sworn, deposes and says: that the above statements are true and correct.

Sworn to and subscribed before me on this the H day of September, 1946.

Wotary Public, Baldwin County, Alabama

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MRS. WILLY MAE HENDERSON	
Plaintiff	IN THE CIRCULT COURT OF
vs.	BALDWIN COUNTY, ALABAMA
ALBERT JOSEPH ALLEGRI	<u>an an a</u>
Defendant) (황석인

STYLED CAUSE;

The Plaintiff in the above styled cause having made a written request that I, R. S. Duck, as Clerk of the Circuit Court of Baldwin County, Alabama, notify you to file a statement in writing, under oath, as required by section 903 of Title 7 of the 1940 Code of Alabama;

You are hereby notified to file in the Circuit Court of Baldwin County, Alabama, within thirty days from the service of this notice, a statement in writing, under oath, of all of your assets, including money, choses in action, notes, bonds, and accounts, and all other property, real, personal, or mixed, or any interest therein, with a detailed discription of the same, the location, and reasonable value of each item thereof, together with a detailed list or statement, of any and all liens, mortgages, or encumbrances thereon, showing the amount due upon each, and the owner or holder of such liens, encumbrances or mortgage.

Witness my hand and seal as Clerk of the Circuit Court of Baldwin County, Alabama, this 2 day of September, 1946.

Melde CLERK

Filed 3 day of September, 1946

BALDWIN COUNTY, ALABAMA

IN THE CIRCUIT COURT OF

A Company of the Comp

Defendant

ALBERT JOSEPH ALLEGRI

VS.

Plaintiff

WILLY MAE HENDERSON

MRS.

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STATE OF ALABAMA)
COUNTY OF BALDWIN)

MRS. TEXAS ELENORA SNELLGROVE,)
PLAINTIFF.

VS

ALBERT JOSEPH ALLEGRI, DEFENDANT.

COMPLAINT

COUNT ONE-

The plaintiff claims of the defendant the sum of One Thousand (\$1,000.00) 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 her business or work, all to her damages as aforesaid. COUNT TWO-

Plaintiff claims of the defendant the sum of One Thousand (\$1,000.00) 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

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Howello pheston
ATTORNEYS FOR PLAINTIFF

Defendant's address:

Daphne, Baldwin County, Alabama.

WEXAS BINGRA SHELLGROVE, SULTONS AND COMPLANING. ALBERT FOSSPH ALBERT, Defendant, Plaintiff, RECORDED THE YEAR

Hecieved in Sheriff Office this 6th day of February 1940

Executed this 2th day of the Serving a cefry by withing a cefry by withing a cefry by alleging alleging of the googh alleging.

By B. H. Ju

l. The Court charges the Jury that if you believe the evidence in this case you should find for the defendant.

Refuser Hard Judge