

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU ARE HEREBY COMMANDED to summon J. D. SAYE to appear within thirty days from the service of this writ in the Circuit Court, to be held by said County at the place of holding the same, then and thereto answer the complaint of C. L. MATHEWS.

Witness my hand this 9th day of January, 1942.

R. S. Duck
Clerk.

C. L. MATHEWS, Plaintiff,

VS.

J. D. SAYE, Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW.

1.

The Plaintiff claims of the Defendant Six Hundred (\$600.00) Dollars damages, for that heretofore on to-wit, October 14, 1941, the Plaintiff was driving his automobile along highway 90, a public highway in Baldwin County, Alabama, at Loxley; that on said date and at said place the Defendant negligently drove an automobile which he was then and there driving, into or against the automobile of the Plaintiff, and as a proximate result of said negligence, the automobile of the Plaintiff was damaged as follows: the fenders and body bent and broken; the top bent; the glasses broken; the frame bent; the wheels bent and broken; the radiator and assembly bent and broken; and said automobile otherwise damaged; all to the damage of the Plaintiff.

The Plaintiff alleges that the damage to his automobile was the proximate result of the negligence of the Defendant in the operation of the automobile he was then and there driving or operating.

2.

The Plaintiff claims of the Defendant Six Hundred (\$600.00) Dollars damages, for that heretofore on to-wit, October 14, 1941, the Defendant so negligently operated an automobile which he was then and there driving on or along Highway 90, a public highway in Baldwin County, Alabama, at Loxley, that he drove or caused said automobile to run into or collide with the automobile of the Plaintiff which was then and there upon said highway and as a proximate result of the negligence of the Defendant in and about the operation of the automobile he was then and there driving, the automobile of the Plaintiff was damaged as follows: the fenders and body bent and broken;

the top bent, the glasses broken; the frame bent; the wheels bent and broken; the radiator and assembly bent and broken; and said automobile otherwise damaged, all to the damage of the Plaintiff.

The Plaintiff alleges that said damages to the automobile of the Plaintiff was a proximate result of the negligence of the Defendant in the operation of the automobile he was then and there driving or operating.

3.

The Plaintiff claims of the Defendant One Thousand (\$1000.00) Dollars damages for that heretofore on to-wit, October 14, 1941, the Defendant so negligently operated an automobile which he was then and there driving on or along highway 90, a public highway in Baldwin County, Alabama, at Loxley, that he drove or caused said automobile to run into or collide with an automobile in which the Plaintiff was riding and as a proximate result of the Defendant's negligence in and about the operation of the automobile which he was then and there driving, the Plaintiff was injured as follows: his arms and body bruised; his back injured; he was permanently injured; he was caused to lose time from his work; he suffered a fracture of the distal end cocyx; he was otherwise injured.

The Plaintiff alleges that said damages were the proximate result of the negligence of the Defendant in and about the operation or driving of the automobile which he was then and there driving or operating.

BEEBE & HALL

BY: 

Attorneys For Plaintiff.

723

Received in Sheriff's Office
this 9 day of Jan, 1942
W. R. STUART, Sheriff

C. L. MATHEWS, Plaintiff,
VS.
J. D. SAYE, Defendant.

Repley

Executed January 10th 19 42
by serving copy of within Summons and
Complaint on

J. D. Saye

W. R. Stuart Sheriff

By _____ Deputy Sheriff

RECORDED

SUMMONS & COMPLAINT

Filed this 9 day Jan 19 42
R. Beck
Clerk-Register

BEBE & HALL, LAWYERS,
Bay Minette, Alabama

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU ARE HEREBY COMMANDED to summon R. B. WATSON and B. J. WATSON, individually and as partners composing the partnership of WATSON HARDWARE COMPANY, to appear within thirty days from the service of this writ in the Circuit Court, to be held by said County, at the place of holding the same, then and there to answer the complaint of JAMES A. GODWIN and H. M. GODWIN.

WITNESS my hand this 9th day of January, 1942.


Clerk.

JAMES A. GODWIN and H. M. GODWIN, Plaintiffs,

VS.

R. B. WATSON and B. J. WATSON, individually, and
as partners composing the partnership of WATSON
HARDWARE COMPANY, Defendants.

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

1.

The Plaintiffs claim of the Defendants Seven Hundred Fifty (\$750.00) Dollars damages, for that heretofore on to-wit, December 15, 1941, the Plaintiffs were driving their automobile truck along the Rabon - Perdido Highway, a public road in Baldwin County, Alabama, at a point approximately two miles North of Rabon; that on said date and at said place the Defendants, acting by and through their agent, servant or employee, who was then and their acting within the line and scope of his employment, negligently ran or drove an automobile truck which they were then and their operating along said highway, into or against the automobile truck of the Plaintiffs and as a proximate result of said negligence, the automobile truck of the Plaintiffs was damaged as follows: fenders bent and broken; the hood bent; the panel bent and broken; the door bent and broken; the windshield broken; the body bent; and said automobile truck was otherwise damaged, all to the damage of the Plaintiffs.

The Plaintiffs allege that the damage to the automobile truck was the proximate result of the negligence of the Defendants, who were then and there acting through their agent, servant, or employee, who was acting within the line and scope

of his employment in the operation of the automobile truck that they were then and there driving or operating.

2.

The Plaintiffs claim of the Defendants Seven Hundred Fifty (\$750.00) Dollars damages for that heretofore on to-wit; December 15, 1941, the agent, servant or employee, of the Defendants, who was then and there acting within the line and scope of his employment so negligently operated an automobile truck which he was driving on or along the Rabon - Perdido highway, a public highway in Baldwin County, Alabama, approximately two miles North of Rabon; that he cause said automobile truck to run into or collide with the automobile truck of the Plaintiffs, which was then and there upon said highway, and as a proximate result of the negligence of the agent, servant, or employee of the Defendants, who was then and there acting within the line and scope of his employment, in and about the operation of said automobile truck which he was then and there driving, the automobile truck of the Plaintiffs was seriously damaged as follows: the fenders bent and broken; the hood bent; the panel bent and broken; the door bent and broken; the windshield broken, the body bent; and said automobile truck was otherwise damaged, all to the damage of the Plaintiffs.

The Plaintiffs allege that said damage to the automobile truck of the Plaintiffs was the proximate result of the negligence of the agent, servant or employee of the Defendants, who was then and there acting within the line and scope of his employment, in and about the operation or driving of the automobile truck which he was then and there driving or operating.

BEEBE & HALL

By: 

Attorneys for Plaintiffs.

724

Received in Sheriff's Office
this 9th day of Jan., 1942
W. R. STUART, Sheriff

RECORDED

JAMES A. GODWIN and H. M. GODWIN,
Plaintiffs,

VS.

R. B. WATSON and B. J. WATSON, in-
dividually, and as partners composing
the partnership of WATSON HARDWARE
COMPANY, Defendants.

aluminum

723

SUMMONS & COMPLAINT

Filed this 9th day of Jan 1942
R. Stuart
Clerk-Register

BEEBE & HALL, LAWYERS,
Bay Minette, Alabama

Executed by
Serving Copy to
R. B. Watson
B. J. Watson
this 1/10/42
Sheriff
Otis Commons
By Ernest Hall