

MARY	ALMA DEA	N, Plaintiff,		IN THE CIRCUIT COURT COURT COURT COUNTY, ALABAM.  AT LAW  ANSWER
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AMOS	GARRETT,		. <	Control of the contro
		Defendant.	3	

The Defendant, for answer to the Complaint says, that he is not guilty of the matters therein averred.

Attorney for Defendant

			: 17
***	IN THE CIRCUIT COURT OF	BALDWIN COUNTY, ALABAMA	AT LAW

MARY ALMA DEAN,

Plaintiff,

.

AMOS GARRETT,

Defendant.

ANSWER

Burned 1943

LLOYD A. MAGNEY Attorney Foley, Alabama. STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU ARE HEREBY COMMANDED to summon AMOS GARRETT, 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 the Complaint of MARY ALMA DEAN.

Witness my hand this the day of January, 1943.

Clerk.

MARY ALMA DEAN, PLAINTIFF,

VS.

AMOS GARRETT, DEFENDANT.

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

(1)

SAND (\$5000.00) DOLLARS damages, for that heretofore on to-wit, May 3, 1942, The Plaintiff was riding as a guest in an automobile driven by the Defendant along Highway # 31, a public highway, at a point approximately five miles south of Evergreen in Escambia County, Alabama; that at at said time and place the Defendant willfully and wantonly injured the Plaintiff by so operating said automobile as to cause it to run off the road and overturn, and as a proximate result thereof the Plaintiff was injured as follows: she suffered a double fracture of the skull, her vertabrae fractured, her leg dislocated and burned, she was permanently injured; she was caused to suffer and will suffer great physical pain, and mental anguish; she was caused to incur, medical and hospital and doctor's bills, she was otherwise injured; she was caused to lose time; all to her damage aforesaid;

The Plaintiff alleges that her damages and injuries were the proximate result of the negligence of the Defendant in and about the operation of the automobile which he was driving and in which she was riding.

The Plaintiff claims of the Defendant FIVE THOUSAND (\$5000.00) DOLLARS, as damages, that on to-wit: May 3, 1942, the Defendant want-only or willfully injured the Plaintiff by causing or allowing an auto-mobile which he was driving on or along Highway # 31 at a point approximately five miles south of Evergreen in Escambia County, Alabama, and in which the Plaintiff was riding as a guest, to leave the highway and overturn thereby severely injuring the Plaintiff as follows: she suffered a double fracture of the skull, her vertabrae fractured, her leg dislocated and burned, she was permanently injured; she was caused to suffer and will suffer great physical pain, and mental anguish; she was caused to incur, medical and hospital and doctor's bills, she was otherwise injured; she was caused to lose time; all to her damage aforesaid;

The Plaintiff alleges that her damages and injuries were the proximate result of the negligence of the Defendant in and about the operation of the automobile which he was driving and in which she was riding.

BEEBE & HALL

By: Jace Attorneys for Plaintiff.

Hanteff, Cleman Ly jury 3

Dece of Hace Destablished Coly John

ALIOS GARRETT, 28 Jeputy Sheriff this\_2 day of Jazzi 1943 W. R. STUART, heriff

MARY ALMA DEAN,

Plaintiff,

SUMMONS AND COMPLAINT

		ss shall wish to charge nent of Court, else he	shall be barred.	shall produc Tir	e to the ( nes Prtg.	Clerk in term th Co., Bay Minet
IE STATE OF BALDWIN C	ALABAMA	Case No.797		Ci A <sub>p</sub> ril.	RCUIT	COURT —Term, 194_
ny Sheriff of the Sta	te of Alabama, C	GREETING:				
	: :	and the state of t		# # * *		
ou are hereby comm	anded to summo	n JC Hyde,	Rfd Ever	green.	Ala	
		\$	Highway	31.		
oe found in your Cou	nty, at the instan	ce of the				
and appear before the			· •			44
rom day to day and	d term to term	of said Court until	discharged by la	ıw, then ar	d there	to testify, an
uth to say, in a certa	ain cause nendin	g wherein Mer	w Alem Dean	•		
3, 11, 10	•	g, wherem = Figs	· LOSA	<u> </u>		Plaintif
A <sub>mos</sub> _	Garrett.		Defendant.			
erein fail not and h	ave you then an	d there this Writ				
		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	• • •			an war
ven under my hand a	and seal, this_29	thday of-	March.			194_3
•			· · · · · · · · · · · · · · · · · · ·			
			Ballu	$M \setminus$		———Clerk

	Received in office thisday of	ORIGINAL	
<b>)</b>	194	No <del>797 •</del> Pag	ge
	SHERIFF	THE STATE OF AI  Baldwin Cour	
	I have executed this writ	CIRCUIT C	OURT
		Mary Akma. Alma.	
	3/30/23		<u> </u>
-		VS. Amos Garrett.	Plaintiff
_		c	Defendant
-	:	CIVIL SUBP	OENA
-			——day of
	M. M. Monse	March.	194 <sup>3</sup>
-	SHERIFF	(	Clerk.

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HE STATE OF ALABAMA  BALDWIN COUNTY	Case No. 797		Term, 194
ny Sheriff of the State of Alabama, Gl	REETING:	<b>,</b>	
You are hereby commanded to summon	ms W. C	Mª H	man,
You are hereby commanded to summon loyley, L.P. Common	etocke, Av	bertida	ele.
be found in your County, at the instance	e of the		
e and appear before the honorable, the Ju	idge of the Circuit Court	of Baldwin County,	at the Court House there
y 8.30'clock of the forenoon, on the	/3 th day of	april	, 194 <u>3</u>
- 19 cm			
	•	•	
from day to day and term to term of	of said Court until disch	arged by law, then	and there to testify, and
from day to day and term to term of	of said Court until disch	arged by law, then	and there to testify, and
from day to day and term to term of truth to say, in a certain cause pending	of said Court until disch	arged by law, then	and there to testify, and
from day to day and term to term of truth to say, in a certain cause pending	of said Court until disch	arged by law, then	and there to testify, and
from day to day and term to term of	of said Court until disch	arged by law, then	and there to testify, and
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from day to day and term to term of truth to say, in a certain cause pending the say. If a say, therein fail not and have you then an	of said Court until disch	arged by law, then	and there to testify, and
from day to day and term to term of truth to say, in a certain cause pending	of said Court until disch	arged by law, then	and there to testify, and

eceived in office thisday of	ORIGINAL
194	No. 797 Page
	THE STATE OF ALABAMA
SHERIFF	Baldwin County
have executed this writ	
The Chil 1943	CIRCUIT COURT
Och N. Za Och	
be to plane at	Mary Celma Wean
Mys Milosofan	
of. G. Comstres	
	Plaintiff
	VS.
	- Wa. Unive Buret,
	Defendant
	CIVIL SUBPOENA
	w/t
	Issued this day of
	<u>(ibul. 1943</u>
UR Sunt	
SHERIFF	75 Duch
GILLIUI	Clerk.

THE STATE OF ALABAM	<b>A</b>		es Prtg. Co., Bay Minette
BALDWIN COUNTY	Case No707	April.	Term, 194
o any Sheriff of the State of Alabama	, GREETING:		
You are hereby commanded to sum	mon Clifford Hvd	3	
	V	;	
f to be found in your County, at the inst	tance of the Plaintif	<u> </u>	
be and appear before the honorable, th	e Judge of the Circuit Court (	of Baldwin County, at t	he Court House there-
f, by 8 30 clock of the forenoon, on	the 13th day of Am	m: 7	
			104 7
nd from day to day and term to term	n of said Court until discha	arged by law, then and	there to testify, and
nd from day to day and term to term	n of said Court until discha	arged by law, then and	
nd from day to day and term to	n of said Court until dischaling, wherein Mary Alm	arged by law, then and	there to testify, and
nd from day to day and term to	n of said Court until discha	arged by law, then and	there to testify, and
nd from day to day and term to term	n of said Court until dischaling, wherein Mary Alm	arged by law, then and	there to testify, and
nd from day to day and term to	n of said Court until dischaling, wherein Mary Alm	arged by law, then and	there to testify, and
nd from day to day and term to	n of said Court until dischaling, wherein Mary Alm  Def	arged by law, then and	there to testify, and Plaintiff
nd from day to day and term to	n of said Court until dischaling, wherein Mary Alm Dei	arged by law, then and	there to testify, and
nd from day to day and term to	n of said Court until dischaling, wherein Mary Alm  Def	arged by law, then and	there to testify, and Plaintiff

Received in office this	day of	. 0	RIGIN	AL	· _:	
·	194	No.797.		Page		
Annual An	SHERIFF	THE STA	TE OF dwin Co		ВАМ	A.
g executed this writ	ace I	CIRCU	JIT	CO	URT	<u>=</u> =
Let X / Luke miner		-Mary Alma,	, Dean		:	<del></del>
			vs.	I	laintiff	
		Amos	Garrett	•		
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			ù	<u> i,</u>		_
		:		De	fendant	
÷.		CIVIL	SUB	PO	EN A	= <u>{</u>
		Issued this_			_day o	f
Mr.		Aŗ	oril.	<u>.</u>	194_3	<u>.</u>
VA Marie		$\mathbb{R}$	Duc	l_		
S	HERIFF	<del></del>			Clerk.	-

CIVIL SUBPOENA—ORIGINAL—In case wi Subpoena, or within five days after adjou	tness shall wish to charge for attendan arnment of Court, else he shall be barre	ce, he shall produce to the d. Times Prts	Clerk in term this Co., Bay Minette
THE STATE OF ALABAM BALDWIN COUNTY	A } Case No. 797.	OTT OTT	
To any Sheriff of the State of Alabama			
	,, (1)		•
You are hereby commanded to sum	Dr Holl-		
Tou are necessy commanded to sum	mon Di HOTTY		
if to be found in your County, at the ins	tance of the P1++		
in the same and your obtaining, at the same same	tarter of the		
to be and appear before the honorable, th	ne Judge of the Circuit Court of Bal	dwin County, at the Co	urt House there-
	•		
of, by 8 30 o'clock of the forenoon, on	the 13th day of April.	and the second of the second o	, 19 <del>4z</del>
and from day to day and term to ter	•	· •	
and Amos Garrett	Defenda		
	~Defenda	nt.	
Herein fail not and have you then	and there this Writ.		
Given under my hand and seal, this—	7th day of April		194
		20 Duck	Clerk
			OACI S

THE STATE OF ALABAM Baldwin County  CIRCUIT COUR:  Mary, Alma Dean.  Plaintiff VS.  Amos Garrett.  Defendant CIVIL SUBPOEN.	Received in office thisday of	ORIGINAL
Baldwin County  I have executed this writ  Systeming in fuel  Mary, Alma Dean.  Plaintiff  VS.  Amos Garrett.  Defendant  CIVIL SUBPOEN  Issued this 7th day  April.  Partuck		No.797• Page
Mary Alma Dean.  Plaintiff  VS.  Amos Garrett.  Defendant  CIVIL SUBPOEN  Issued this 7th day  April. 195  WR. Shunf	SHERIFF	THE STATE OF ALABAMA Baldwin County
Plaintiff VS.  Amos Garrett.  Defendant CIVIL SUBPOEN  Issued this 7th day  April. 198  WR. Shunf	by serning in free	CIRCUIT COURT
Defendant  CIVIL SUBPOEN  Issued this 7th day  April. 195		Mary Alma Dean.
Defendant  CIVIL SUBPOEN  Issued this 7th day  April. 198		
Defendant  CIVIL SUBPOEN  Issued this 7th day  April. 1943		Plaintiff VS.
Issued this 7th day  April. 1945  WR. Shuurf		Amos Garrett.
Issued this 7th day  April. 1945  WR. Shuuf		
Issued this 7th day  April. 195  WR. Shunf		Defendant
WR. Church Price		CIVIL SUBPOENA
WR. Bhunt - Rowerd		Issued this 7th day of
SHERIFF Clerk.	110 11/101 8 -	April. 1945
	W 17 Sheriff	Clerk.

Brewton Ala.