

VERBA WHITE,

Plaintiff,

VS.

AUTREY GREER & SONS, a
partnership composed of
Autrey Greer, E. S. Greer,
J. Barton Greer, and Jack
Greer; and Autrey Greer, E.
S. Greer, J. Barton Greer, and
Jack Greer, individually,

Defendants.

IN THE CIRCUIT COURT OF

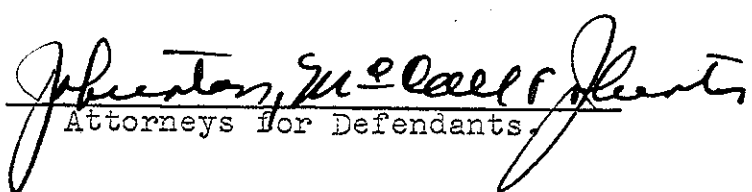
BALDWIN COUNTY, ALABAMA

AT LAW

No. _____

1. Defendants for answer to the Complaint say they are not guilty.

2. And for further plea in their behalf to the Complaint, the Defendants say that at the time and place complained of, a servant or agent of the Plaintiff, acting within the line and scope of her employment as such, was, herself, guilty of negligence thereby proximately contributing to Plaintiff's alleged injuries.


Attorneys for Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO.

VERBA WHITE,

Plaintiff,

VS.

AUTREY GREER & SONS, a
partnership composed of
Autrey Greer, E. S. Greer,
J. Barton Greer, and Jack
Greer; and Autrey Greer,
E. S. Greer, J. Barton
Greer, and Jack Greer,
Individually,

Defendants.

PLEAS

Filed
1-29-47
W. J. Ruck
Clerk

JOHNSTON, MCCALL & JOHNSTON
LAWYERS
SUITE 804, FIRST NATIONAL BANK ANNEX
MOBILE 4, ALABAMA

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Autrey Greer and Sons, a partnership composed of Autrey Greer, E. S. Greer, J. Barton Greer and Jack Greer; and Autrey Greer, E. S. Greer, J. Barton Greer and Jack Greer; individually, to appear within thirty (30) 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 Verba White.

Witness my hand this 27 day of July, 1946.

R. H. Welch
Circuit Clerk

COMPLAINT

VERBA WHITE,
Plaintiff

VS

AUTREY GREER & SONS,
a partnership composed of
Autrey Greer, E. S. Greer,
J. Barton Greer and Jack
Greer; and Autrey Greer, E.
S. Greer, J. Barton Greer,
and Jack Greer, individually,
Defendants.

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

1. The Plaintiff claims of the Defendants Five Thousand Dollars (\$5000.00) as damages for that heretofore on, to-wit: July 30, 1945, the Plaintiff was a passenger in an automobile that was being operated along and upon a public highway, namely U. S. Highway No. 31 at Spanish Fort in Baldwin County, Alabama, about one-fourth of a mile Northeast of the Intersection of the said Highway with U. S. Highway No. 90, where she had a right to be and while the said automobile was being operated and driven along the said highway, Defendant's truck which was then being operated and driven by the agent, servant, or employee of the Defendants, while acting

within the line and scope of his authority, negligently ran said truck into or against the automobile in which the Plaintiff was riding and as the proximate result of such negligence, Plaintiff was cut on her right ear, on her forehead, on her right hand and left knee. She was bruised, made sick and sore, caused her to suffer a nervous breakdown and lose time from her work. She was permanently injured because the cuts on her forehead left permanent scars. The Plaintiff alleges that her said injuries and damages were proximately caused by the said negligence of the Defendant's agent, servant or employee.

J. B. Blackburn
Attorney for Plaintiff

Plaintiff demands a trial of said cause by jury.

J. B. Blackburn
Attorney for Plaintiff

Received 1st Day of August 1946
and on 2nd Day of August 1946
I served a Copy of the within Complaint & Summons
on Autrey Greer & Sons, et al, Defendants
Jack and Cuthy Greer & Sons, partners in
by service on Jack Greer, manager of

W. H. HOLCOMBE, Sheriff

By W. B. Blackburn D.S.

Recorded 979 1340

ORIGINAL

VERBA WHITE,
Plaintiff

VS

AUTREY GREER & SONS, et als,
Defendants

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

X - Bernstein
J. Greer
manager of firm

Filed on this the 27th day of
July, 1946.

Blackburn
Cliff

J. B. BLACKBURN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA

The State of Alabama,
Baldwin County

S. D. Page No. _____

CIRCUIT COURT

Case No. 979

1936 Term, 1936

To Any Sheriff of the State of Alabama, GREETING:

YOU ARE HEREBY COMMANDED TO SUMMON

Emmie W. White
Willie Embanks, Patrolman Strickland

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 9:30 o'clock of the forenoon, on the 15th day of December, 1936, 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

Verbas White

Plaintiff

and

Antony Green & Sons

Defendant.

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

Given under my hand and seal, this

27

day of

Nov

, 1936

W. J. Smith

CLERK.

Received in office this _____ day of

193_____

SHERIFF

I have executed this writ

Copy on

Dec. 2 1944

Emmie Weckley

Willie Embury

C. E. Garrett

H. F. Hall Deputy

SHERIFF

ORIGINAL

No. 979

Page _____

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Verba White

Plaintiff

VS.

Antony Green & Son

Defendant

CIVIL SUBPOENA

Issued this 27th day of

Nov

1934

Reigfrenes
Clerk.

The State of Alabama,
Baldwin County

S. D. Page No. _____

CIRCUIT COURT

Case No. 979

11/11 Term, 1936

To Any Sheriff of the State of Alabama, GREETING:

YOU ARE HEREBY COMMANDED TO SUMMON

Emmie Wesley
Willie Gurbanks, Patrolman Strickland

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 9:15 o'clock of the forenoon, on the 4th day of December 1936, 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

Verbas White

Plaintiff

and

Antony Hester & Sons

Defendant.

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

Given under my hand and seal, this

27

day of

Nov

, 1936

Alfred J. Smith

CLERK.

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 shall be barred. Times Prtg. Co., Bay Minette.

THE STATE OF ALABAMA
BALDWIN COUNTY

} Case No. 997 11th Term, 1946
CIRCUIT COURT

To any Sheriff of the State of Alabama, GREETING:

You are hereby commanded to summon

W. A. Cornwell

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

aleft

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

of, by 9:00 o'clock of the forenoon, on the

4th

day of

Dec

1946

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

Verbas White

Plaintiff

and

Antony Green & Sons

Defendant.

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

Given under my hand and seal, this

9th

day of

Dec

1946

W. J. Luck Clerk

Received in office this _____ day of

194

SHERIFF

I have executed this writ

*Not served - returned
to Late*

C. E. Danett

SHERIFF

ORIGINAL 17

No. *979*

Page

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Verbas White

Plaintiff

VS.

Antrey Greer & Sons

Defendant

CIVIL SUBPOENA

Issued this *7th* day of

Dec

194*6*

Alice J. Newell
Clerk.

979

VERBA WHITE

Plaintiff

VS.

AUTREY GREER & SONS,
a partnership composed of
Autrey Greer, E. S. Greer,
J. Barton Greer and Jack Greer;
and Autrey Greer, E. S. Greer,
J. Barton Greer and Jack Greer,
individually.

Defendants

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

APPEARANCE

On this 24th day of August, 1946, I hereby appear as attorney for
defendants in the above entitled cause and reserve the right to
demur or plead specially.

Walter H. H. H. H.
Attorney for Defendants

979

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW,

VERBA WHITE,

Plaintiff,

Vs.

AUTREY GREER & SONS, a
Partnership composed of
AUTREY GREER, E. S. GREER,
J. BARTON GREER and JACK
GREER; and AUTREY GREER,
E. S. GREER, J. BARTON
GREER and JACK GREER,
Individually,

Defendants.

APPEARANCE

Filed in Office

May 26, 1946

B. L. L. L.

Clerk