

STATE OF ALABAMA  
BALDWIN COUNTY

1041  
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons STANDARD FURNITURE FACTORY, INC., a corporation, to appear within thirty days from the service of this writ in the Circuit Court to be held for said Court at the place of holding the same, then and there to answer the complaint of ERNEST S. HALE.

WITNESS my hand this the 14th day of March, 1947.

Alice J. Welch  
Clerk, Circuit Court of Baldwin County,  
Alabama.

ERNEST S. HALE

PLAINTIFF

VS

STANDARD FURNITURE  
FACTORY, INC.,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

1.

The Plaintiff claims of the Defendant compensation under the Compensation Laws of the State of Alabama, due and owing to the Plaintiff under the following statement of facts, to-wit:

On September 19, 1946, the relation of employer and employee, or of master and servant existed between the Plaintiff and the said Defendant, and they were subject to the Workman's Compensation Act of Alabama, then in force and effect, and while so employed and engaged the Plaintiff suffered injury and damages which were the proximate result of an accident arising of, and in the course of his employment by the Defendant, as follows: the first, second, third and fourth fingers on his right hand were cut off;

That a controversy has arisen between the Plaintiff and the Defendant as to the right of the Plaintiff to compensation under said Compensation Act of Alabama, by reason of said injury and damages; that the Plaintiff is a resident of Baldwin County, Alabama, living at Bay Minette, and the Defendant is a corporation with its principal place of business at Bay Minette, in Baldwin County, Alabama.

That at the time of the accident the Plaintiff was engaged by the Defendant in moving material from a planing, commonly called tailing a planing machine, in its factory in Bay Minette, Alabama, at 40¢ per hour; that he was working nine hours per day for five or six days a week; that in the course of his employment the Plaintiff lost his first, second, third, and fourth fingers off of his right hand.

That the Defendant had immediate notice of, and actually became aware of the injury and damages to the Plaintiff;

The Plaintiff avers that he is entitled to compensation at the rate of TWELVE DOLLARS AND NINETY SIXCENTS (\$12.96) per week, based upon the average weekly earnings, and the fact that the Plaintiff has a wife dependent upon him, as provided for under the Compensation Laws of Alabama.

2.

The Plaintiff claims of the Defendant the sum of FOURTEEN HUNDRED TWENTY FIVE DOLLARS AND SIXTY CENTS (\$1425.60) and also the sum of TWO HUNDRED (\$200.00) DOLLARS as doctor and medical expenses.

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*Shirley*  
Attorney for the Plaintiff

Received in Sheriff's Office  
this <sup>4th</sup> day of Mar., 1947  
TAYLOR WILKINS, Sheriff

Served March 5 1947  
by serving copy of within Summons and  
Complaint on

John D. Hart's secretary  
for Standard Furniture  
Factory, Inc.

Taylor Wilkins Sheriff  
H. F. Hall Deputy Sheriff

1041

ERNEST S. HALE

PLAINTIFF

VS

STANDARD FURNITURE  
FACTORY, INC.,

DEFENDANT

BILL OF COMPLAINT

FILED

MAR 4 1947

ALICE J. DUCK, Clerk

HUBERT M. HALL  
LAWYER  
BAY MINETTE, ALABAMA

ERNEST S. HALE,

Plaintiff,

VS.

STANDARD FURNITURE FACTORY INC.,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

COMPENSATION CASE

NO. 1041

Comes Standard Furniture Manufacturing Company, Inc.,  
defendant in the above styled cause and for answer to the complaint  
heretofore filed therein, says:

That its name is Standard Furniture Manufacturing Company,  
Inc., not "Standard Furniture Factory, Inc.".

Defendant denies that it and plaintiff were subject to the  
Workman's Compensation Act of Alabama, but admits that plaintiff  
was injured at defendant's plant on or about the date alleged.

Defendant admits that there is a controversy between it  
and plaintiff as to plaintiff's rights to compensation; denies that  
plaintiff is a resident of Baldwin County, Alabama, but admits that  
defendant is a corporation with principal place of business in  
Baldwin County, Alabama.

Defendant admits that plaintiff was injured by a planing  
machine at its plant but denies that he was working regular hours  
and denies that he was an employee of defendant.

Defendant admits that it had knowledge of plaintiff's injury.

Defendant alleges that plaintiff is receiving compensation  
from the Government for his injury.

Defendant denies that plaintiff is entitled to recover any  
sum of money from it, either for compensation or for doctors and  
medical expenses.

  
Attorneys for Plaintiff

Attorney for Plaintiff

Medical expenses.

Amount of money from it, either for compensation on the goods and  
Defendant denies this plaintiff is entitled to recover any  
from the government for the injury.

Defendant alleges that plaintiff is receiving compensation  
Defendant admits that it has knowledge of plaintiff's injury.  
and denies that he has an employee of defendant.  
witness of the plaintiff but denies that he has working relation there

Defendant admits that plaintiff was injured by a plaintiff

Defendant is a corporation with principal place of business in  
plaintiff is a resident of DeKalb County, Georgia, but defendant  
and plaintiff as to plaintiff's rights to compensation; defendant

Defendant admits that there is a controversy between it  
has injured as defendant's agent on or about the date alleged  
workman's compensation act of Georgia, but denies that  
Defendant denies that it and plaintiff were united to the  
Inc. and defendant defendant Georgia, Inc.

That the same is defendant defendant defendant defendant  
defendant defendant defendant defendant defendant defendant

Defendant in the above stated cases and for charges for the compensation

Comes defendant defendant defendant defendant defendant

Defendant

Defendant defendant defendant defendant defendant

Defendant defendant defendant defendant defendant

Defendant defendant defendant defendant defendant

1491

Filed  
3-3-41  
Alice J. Luck  
Clerk