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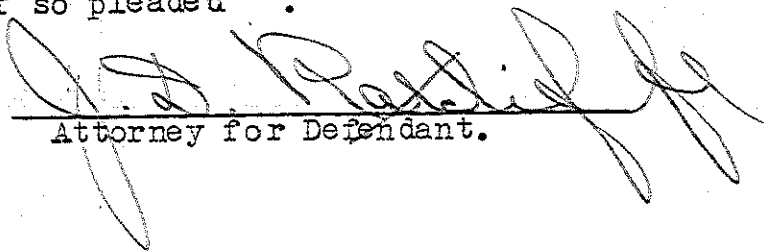
Myrtle LaValley, Plaintiff,

VS.

V. M. Brooks, Defendant.

)  
)  
) IN THE CIRCUIT COURT OF BALDWIN  
)  
) COUNTY, ALABAMA.

Now comes V. M. Brooks, defendant in the above and foregoing entitled cause, and for answer to the complaint, pleads in short, by consent, the general issue and contributory negligence on the part of the plaintiff, with leave to give in evidence any matter which, if well pleaded, would be admissible in defense of the action, to have effect as if so pleaded. And with leave to the plaintiff to give in evidence any matter, if well pleaded, would be admissible in reply to such defensive matter, to have effect as if so pleaded .

  
Attorney for Defendant.

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Myrtle LaValley

VS.

V. M. Brooks.

Plea in Short by Consent.

Filed April 12<sup>nd</sup>, 1944.

W. B. Butler  
Clerk.

STATE OF ALABAMA  
BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon V. M. BROOKS 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 Myrtle LaValley.

Witness my hand this the 26th day of January, 1944.

[Signature]  
Clerk.

MYRTLE LaVALLEY  
PLAINTIFF

VS

V. M. BROOKS  
DEFENDANT.

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

The Plaintiff claims of the Defendant TEN THOUSAND DOLLARS as damages for that, heretofore, on to-wit November 20th, 1943, she was in her home and place of business about seven miles North of Bay Minette, along Highway 31, in Baldwin County, Alabama, and that at said time and place the Defendant, acting by and through his agent or employee, who was then and there acting within the line and scope of his employment, negligently ran an automobile truck into and against the building in which the Plaintiff was at that time, and as a proximate result thereof the building was torn in and the Plaintiff was injured as follows: her arm and leg bruised; her hip injured; her spinal column dislocated; she was permanently injured; she was caused to suffer great pain and mental anguish; she incurred doctor, drug, and hospital bills; she was caused to lose time from her work, all to the damage of the Plaintiff as aforesaid.

The Plaintiff alleges that her injuries and damages were the proximate result of the negligence of the Defendant, acting by and through his agent, servant or employee, who was then and there acting within the line and scope of his employment.

BEEBE & HALL

By [Signature]  
Attorneys for Plaintiff.

Plaintiff demands  
a trial by jury

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MYRTLE LEVALLER

PLAINTIFF

VS

V. M. BROOKS

DEFENDANT.

SUMMONS AND COMPLAINT.

The Defendant lives at Broomfield,  
Alabama.

166 C4 H. S. H.

Ind. Jan 26 1944  
B. Brooks  
Ole

2-2-44

Received 2 Day of Feb 1944  
 and on 3 Day of Feb 1944  
 I served a Copy of the within 240  
 on V. M. Brooks  
 by service on \_\_\_\_\_  
 \_\_\_\_\_  
 W. H. HOLCOMBE, Sheriff  
R. F. Matthews

MYRTLE LAVALLEY

PLAINTIFF

VS.

V. M. BROOKS

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

Comes the devendant and for plea says:

First: Not guilty

*G. D. Reich*  
Attorneys for Defendant

MYRTLE LAVALLEY

VS.

V. M. BROOKS

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MYRTLE LAVALLEY

PLAINTIFF

VS.

*G. D. Reich*

IN THE CIRCUIT COURT OF BALDWIN

COUNTY, ALABAMA AT LAW.

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C. R. LAVALLEY

PLAINTIFF

VS.

V. M. BROOKS

DEFENDANT

Comes the defendant and for plea says:

First: Not Guilty

*[Signature]*  
Attorneys for Defendant

C. R. LAVALLEY  
PLAINTIFF

VS.

V. M. BROOKS

DEFENDANT

PLEA

FILED April 4, 1944

*Revised -  
Stamps*

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THE STATE OF ALABAMA  
BALDWIN COUNTY

} Case No. 848 Nov Term, 1944  
CIRCUIT COURT

To any Sheriff of the State of Alabama, GREETING:

You are hereby commanded to summon W. E. Grimes, Rt. 1 Atmore; J. N. Mauldin, Star Rt  
Atmore, Dr. L. D. Newman; A. E. Relf, *Dyke*  
if to be found in your County, at the instance of the \_\_\_\_\_

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

of, by 10 o'clock of the forenoon, on the 6th day of Nov, 1944

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 Myrtle LaValley Plaintiff

and V. M. Brooks Defendant.

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

Given under my hand and seal, this 28th day of Oct 1944

*R. S. Duck* Clerk

Received in office this \_\_\_\_\_ day of \_\_\_\_\_  
\_\_\_\_\_ 194\_\_\_\_\_

SHERIFF

I have executed this writ

11/3/44

*A E Relf and*  
*Dr Newman*

ORIGINAL

No.

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THE STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

MYRTLE LAVALLEY

Plaintiff

VS.

V. M. BROOKS

Defendant

CIVIL SUBPOENA

Issued this 28th day of

Oct

194\_4

*W R Stuart*

SHERIFF

*R. S. Duck*

Clerk.