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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 C. R. LaValley.

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

R. S. Smith
Clerk.

C. R. LaVALLEY,

PLAINTIFF

VS

V. M. BROOKS,

DEFENDANT.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

The Plaintiff claims of the Defendant ONE THOUSAND DOLLARS as damages for that, heretofore, on to-wit November 20th, 1943, 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, negligently ran an automobile truck into and against a building of the Plaintiff, located along Highway 31, approximately seven miles North of Bay Minette, in Baldwin County, Alabama, and as a proximate result of said negligence the building and property of the Plaintiff was damaged as follows: the walls broken in; the windows broken out; the furniture and fixtures therein broken, and the building and furniture and fixtures otherwise damaged, all to the damage of the Plaintiff as aforesaid.

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

BEEBE & HALL
By W. H. Hall
Attorneys for Plaintiff.

Plaintiff demands
a trial by jury

986
849
[Signature]

237-

C. R. LAVALLEY

PLAINTIFF

VS

X 37 Madison
V. M. BROOKS

DEFENDANT.

SUMMONS AND COMPLAINT.

The Defendant lives at Exoel,
Alabama.

Delivered on 21, 1944
[Signature]

Received 2 Day of Feb 1944
and on 3 Day of Feb 1944
I served a Copy of the within D & C
on V. M. Brooks
by service on _____

W. E. FOLCOMBE, Sheriff
R. F. Matthews D.E.

C. R. LaValley, Plaintiff,

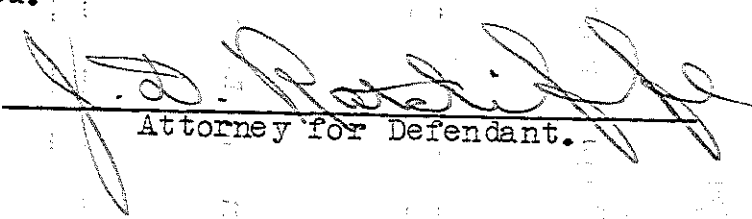
VS.

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.

C. R. LaValley

VS.

V. M. Brooks.

Plea in Short by Consent.

Filed April 23, 1944.

R. Blum
Clerk.

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