The State of Alabama, }

CIRCUIT COURT. (LAW)

Movember.

_Term, 194____

	jack	Bessley	•		
 Vo	871.)	vs.			
	T. 5	Monn	1	• *	

			J.	1 '- '	. 7
	BII	L O	FCOSTS		
CLERK'S FEES:		DUNT	SUMMARY OF FEES, COSTS, AND JUDGMENT	AMC	DUNT.
Fees in Circuit Court-			Spees and Costs in Circuit Court:	5	40.
Docketing Cause, One Fee only of		25	Clerk's Fees	-	
Issuing Summ. and Complt., each	1	25	Ex-Clerk's Fees	1	50
Issuing Alias or Branch Summons & Complaint, each 1.25		-	Sheriff's Fees Ex-Sheriff's Fees		1
Making Copies Thereof, Minimum, each30		ಶ೦	Ex-Sheriff's Fees		
Making Copies Thereof, over 200 Words, per 100 words .15			Commissioner's Fees	1,,	
Entering Sheriff's Returns, each20	║ `	20 40	Commissioner's Pees		
Entering Appearances, each			Garnishee's Fees		
Certifying Affidavits, each			Fublisher's Fees		
Issuing Attachments with Bond, each				i	٠.
Copy of Same, each			Court Reporter's Fees, Per Day or fraction thereof .5.00		-
Issuing Summ. to Garnishee, each			Trial Tax	3	00.
Copy of Same. Per 100 Words					
Swearing Garnishee, Etc., Per 100 words,					
.15, Minlmum50	j[,,,,,,,, .		
Release of Garnishee, each		1	.,,		}
Issuing Scire Facias or Similar Notice, each					
Copies of Same, Per 100 Words	' -			1	
Making Copy of Interrogatories, Per 100 Words, .15; Minimum		1	Fees and Costs in Inferior Court:	1	
Commission to Take Depositions, each)	1	Clerk of Inferior Court Fees		[
Filing Depositions, Each Pkg			Sheriff's Fees		1
Endorsing Each Package of Depositions Opened10			Justice of Peace Fees		!
Issuing Subpoenas, Each30			Constable's Fees		
Issuing Witness Certificates, each					
Entering Continuances, each		***	The state of the s		
Filing Papers, each		30	Fees and Costs in Inferior Court		•
Other Orders of Court, each		30		0	90
Trial and Incidents	"		Total Fees and Costs		-
Entering Judgment, each			Judgment		
Complete Record, Per 100 Words	2	40	10 Per Cent Damages		•
Taking Bonds, each			Interest	İ	
Certificate of Appeal25			Total Judgment		1
Transcript to Supreme Court, Per 100 Words15			Treas dugment	-	
Additional Copies of Same, Per 100 Words		1	Total Fees, Costs and Judgment		
Issuing Executions or Copy Thereof, each50					
Entering Sheriff's Return, Per 100 Words, .15; Minimum		·			
·			Total		
	5	40		ŀ	
Total Clerk's Fees					
SHERIFF'S FEES:	_				
Serving and Returning Summons or Writ, each	1	50			
Leyving Attachment each	hand for	ļ	and the second s		
Entering and Returning Same, each					
Seizing Personal Property Under Writ of Detinue 3.00					
Taking and Approving Bonds, each		,			1
Summoning Garnishee and Return, each		6.7		· ·	
Serving and Returning Sci. Fa. or Notice, Each1.50					
Serving and Returning Subpocnas, each				1	
Serving Contempt Attachment, each]
Impaneling Jury					
Collecting Execution for Costs Only, each1,50					
Coms. for Collecting Money on Executions		-			
Executing Writs of Possession, each5.00					1
Making Deed to Real Estate Sold, each2.50				1	
· · · · · · · · · · · · · · · · · · ·		.			
Total Sheriff's Fees					
	41	1	10	j t	4 5

JACK BEASLEY
PLAINTIFF

VS

L. F. HORN, ET AL DEFENDANT IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW.

And now comes the Defendant, and demurs to the Plaintiff's bill of complaint and to each count thereof, separately and severally, says:

ONE:

That said count does not state a cause of action.

TWO:

That the said count charges the conduct of the agent of the Defendant as being wanton, rather than the injury.

BEEBE & HALL

Attorneys for the Defendant.

JACK BRASLEY, PLAINTIFF

VS

L. F. HORN, ET AL DEFENDANT

DEMURRER TO PLAINTIFF'S BILL OF COMPLAINT.

A CONTRACTOR OF THE CONTRACTOR

STATE OF ALABAMA, COUNTY OF BALDWIN.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon L. F. HORN, sometimes known as Linnie Horn, 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 JACK BEASLEY.

Witness my hand this the day of 1944.

R.S.	duch	,
	· CLERK.	

JACK BEASLEY,

Plaintiff,

Vs. .

L. F. HORN, sometimes known as LINNIE HORN,

Defendant.

IN THE CIRCUIT COURT OF BALDWIN COUNTY. ALABAMA.

COUNT ONE: Plaintiff claims of the Defendant Ten Thousand Dollars as damages, for that heretofore on, towit, the 29th day of Debruary, 1944, a servant or agent of the Defendant, while acting within the line and scope of his authority as such, so negligently operated an automobile, in which the Plaintiff, who was then and there a prisoner under arrest for a misdemeanor, was being transferred from Mobile, Alabama, to, to-wit, Brantley, Alabama, that he ran the same into and against a truck then and there on a public highway commonly known as the Mobile-Montgomery Highway at a point near Camp Baldwin in Baldwin County, Alabama, and as a proximate result thereof the Plaintiff was seriously injured, his body was bruised and lacerated, he suffered a severe injury to his kidney and bladder, he was otherwise hurt, injured and made sick and sore, was caused to suffer great physical pain and mental anguish, and will in the future continue to suffer much physical pain and mental anguish, and will be permanently injured and didabled; he was caused to lose much time from his work, and will continue to lose much time from his work in the future; he has incurred great expense in and about the healing and treatment of his injuries; all as a proximate consequence of the negligence of the Defendant's servant or agent, then and there acting within the line and scope of his employment, while operating said automobile on said highway at said point.

COUNT TWO: Plaintiff claims of the Defendant Ten Thousand Dollars damages for that heretofore on, to-wit, the 29th day of February, 1944, a servant or agent of the Defendant, while acting within the line and scope of his employment, wantonly injured the Plaintiff by driving an automobile, in which he, the said Plaintiff, while a prisoner under arrest for a misdemeanor was being transferred from Mobile, Alabama, to, to-wit, Brantley, Alabama, into a truck which was then and there on a public highway commonly known as the Mobile-Montgomery Highway, at a point near Camp Baldwin, Baldwin County, Alabama; and Plaintiff avers that as a proximate result of such wanton conduct on the part of the Defendant's servant or agent while acting within the line and scope of his employment as such, he was seriously injured, his body was bruised and lacerated, his kidney was ruptured, his bladder was ruptured, he was otherwise hurt, made sick and sore, he was caused to suffer great physical pain and mental anguish, and will continue to suffer much physical pain and mental anguish in the future, was caused to lose much time from his work, and will be caused to lose much time from his work in the future; he was permanently injured; his ability to earn a livelihood has been permanently impaired; he was caused to incur heavy expense for medicines in and about the healing and treatment of his said injuries; all as a proximate consequence of the wanton conduct on the part of the servant or agent of the Defendant, while acting within the line and scope of his employment as aforesaid, and

to the Praintiff's damage as claimed.

ATTORNEY FOR PLAINTIPE

Plaintiff demands a trial by jury.

ATTORNEY FOR PLAINTING

Defendant's address:

Brantley, Alabama.

STATE OF ALABAMA,)
COUNTY OF BALDWIN.)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon L. F. HORN, sometimes known as Linnie Horn, 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 JACK BEASLEY.

Witness my hand this the $7 \sim$ day of July, 1944.

Phlluch CLERK.

JACK BEASLEY,

Plaintiff,

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

Vs.

L. F. HORN, sometimes known as LINNIE HORN,

Defendant.

endanc.

Ten Thousand Dollars as damages, for that heretofore on, towit, the 29th day of Bebruary, 1944, a servant or agent of the
Defendant, while acting within the line and scope of his
authority as such, so negligently operated an automobile,
in which the Flaintiff, who was then and there a prisoner under
arrest for a misdemeanor, was being transferred from Mobile,
Alabama, to, to-wit, Brantley, Alabama, that he ran the same
into and against a truck then and there on a public highway
commonly known as the Mobile-Montgomery Highway at a point
near Camp Baldwin in Baldwin County, Alabama, and as a proximate
result thereof the Plaintiff was seriously injured, his body was
bruised and lacerated, he suffered a severe injury to his kidney
and bladder, he was otherwise hurt, injured and made sick and
sore, was caused to suffer great physical pain and mental anguish,

and will in the future continue to suffer much physical pain and mental anguish, and will be permanently injured and didabled; he was caused to lose much time from his work, and will continue to lose much time from his work in the future; he has incurred great expense in and about the healing and treatment of his injuries; all as a proximate consequence of the negligence of the Defendant's servant or agent, then and there acting within the line and scope of his employment, while operating said automobile on said highway at said point.

COUNT TWO: Plaintiff claims of the Defendant Ten Thousand Dollars damages for that heretofore on, to-wit, the 29th day of February, 1944, a servant or agent of the Defendant, while acting within the line and scope of his employment, wantonly injured the Plaintiff by driving an automobile, in which he, the said Plaintiff, while a prisoner under arrest for a misdemeanor was being transferred from Mobile, Alabama, to, to-wit, Brantley, Alabama, into a truck which was then and there on a public highway commonly known as the Mobile-Montgomery Highway, at a point near Camp Baldwin, Baldwin County, Alabama; and Plaintiff avers that as a proximate result of such wanton conduct on the part of the Defendant's servant or agent while acting within the line and scope of his employment as such, he was seriously injured, his body was bruised and lacerated, his kidney was ruptured, his bladder was ruptured, he was otherwise hurt, made sick and sore, he was caused to suffer great physical pain and mental anguish, and will continue to suffer much physical pain and mental anguish in the future, was caused to lose much time from his work, and will be caused to lose much time from his work in the future; he was permanently injured; his ability to earn a livelihood has been permanently impaired; he was caused to incur heavy expense for medicines in and about the healing and treatment of his said injuries; all as a proximate consequence of the wanton conduct on the part of the servant or agent of the Defendant, while acting within the line and scope of his employment as aforesaid, and

to the Plaintiff's damage as claimed.

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ATTORNEY FOR PLAINTIFF

Plaintiff demands a trial by jury.

ATTORNEY FOR PLAINTIFF

Defendant's address:

Brantley, Alabama.

Bearly Received in Shariff's Office this Z-day of July W. R. STUART, Sheriff