

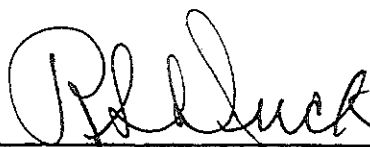
STATE OF ALABAMA,)
COUNTY OF BALDWIN.)

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TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon EDWIN O'NEAL, 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 7th day of July, 1944.



CLERK.

JACK BEASLEY,
Plaintiff,
vs.
EDWIN O'NEAL,
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, to-wit, the 29th day of February, 1944, the Defendant 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 disabled; he was caused to lost 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 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, the Defendant 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, 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 Defendant, ^{as aforesaid} and to the Plaintiff's damage as claimed.


ATTORNEY FOR PLAINTIFF

Plaintiff demands a trial by jury.


ATTORNEY FOR PLAINTIFF

Defendant's address:
Brantley, Alabama.

Executed 19th day
of July 1944
by Harry Handing
a copy of the within
to Edwin Ornel
Andalusia, Ala.

L. F. Horn
Sheriff
Greensboro, Co. Ala

Received in Sheriff's Office
this 7 day of July 1944
W. R. STUART, Sheriff

872
Beasley

200

Ornel

John July 72 1944
J. D. Deak
Deak

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JACK BEASLEY,

Plaintiff,

VS.

EDWIN O'NEAL.


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, to-wit, the 29th day of February, 1944, the Defendant 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 disabled; 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 while operating said automobile on said highway at said point.

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COUNT TWO: Plaintiff claims of the Defendant Ten Thousand Dollars damages for that heretofore on, to-wit, the 29th day of February, 1944, the Defendant 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, 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 Defendant, as aforesaid, and to the Plaintiff's damage as claimed.


ATTORNEY FOR PLAINTIFF

Plaintiff demands a trial by jury.

Defendant's address:
Brantley, Alabama.


ATTORNEY FOR PLAINTIFF

Term, 1944

Edwin O'Neal.

CLERK'S FEES:	AMOUNT
Fees in Circuit Court—	
Docketing Cause, One Fee only of.....	.25
Issuing Summ. and Complt., each.....	1.25
Issuing Alias or Branch Summons & Complaint, each.....	1.25
Making Copies Thereof, Minimum, each.....	.30
Making Copies Thereof, over 200 Words, per 100 words.....	.15
Entering Sheriff's Returns, each.....	.20
Entering Appearances, each.....	.20
Certifying Affidavits, each.....	.25
Issuing Attachments with Bond, each.....	1.00
Orders of Publication, each.....	.50
Copy of Same, each.....	.50
Issuing Summ. to Garnishee, each.....	.50
Copy of Same, Per 100 Words.....	.15
Swearing Garnishee, Etc., Per 100 words, 15, Minimum.....	.50
Release of Garnishee, each.....	.25
Issuing Seire Facias or Similar Notice, each.....	.75
Copies of Same, Per 100 Words.....	.15
Making Copy of Interrogatories, Per 100 Words, .15; Minimum.....	.50
Commission to Take Depositions, each.....	.75
Filing Depositions, Each Pkg.,.....	.10
Endorsing Each Package of Depositions Opened.....	.10
Issuing Subpoenas, Each.....	.20
Issuing Witness Certificates, each.....	.25
Entering Continuances, each.....	.10
Filing Papers, each.....	.10
Other Orders of Court, each.....	.30
Trial and Incidents.....	.75
Entering Judgment, each.....	.30
Complete Record, Per 100 Words.....	.15
Taking Bonds, each.....	.75
Certificate of Appeal.....	.25
Transcript to Supreme Court, Per 100 Words.....	.15
Additional Copies of Same, Per 100 Words.....	.05
Issuing Executions or Copy Thereof, each.....	.50
Entering Sheriff's Return, Per 100 Words, .15; Minimum.....	.20
Total Clerk's Fees.....	5 40.
SHERIFF'S FEES:	
Serving and Returning Summons or Writ, each.....	1.50
Laying Attachment, each.....	3.00
Entering and Returning Same, each.....	.25
Seizing Personal Property Under Writ of Detinue.....	3.00
Taking and Approving Bonds, each.....	1.00
Summoning Garnishee and Return, each.....	1.50
Serving and Returning Sel. Fa. or Notice, Each.....	1.50
Serving and Returning Subpoenas, each.....	.65
Serving Contempt Attachment, each.....	1.50
Impanelling Jury.....	.75
Collecting Execution for Costs Only, each.....	1.50
Coms. for Collecting Money on Executions.....	
Executing Writs of Possession, each.....	5.00
Making Deed to Real Estate Sold, each.....	2.50
Total Sheriff's Fees.....	

SUMMARY OF FEES, COSTS, AND JUDGMENT	AMOUNT
Fees and Costs in Circuit Court:	
Clerk's Fees.....	5 40
Ex-Clerk's Fees.....	
Sheriff's Fees.....	1 50.
Ex-Sheriff's Fees.....	
Witness Fees.....	
Commissioner's Fees.....	
Garnishee's Fees.....	
Publisher's Fees.....	
Court Reporter's Fees, Per Day or fraction thereof.....	5.00
Trial Tax.....	3 00
Fees and Costs in Inferior Court:	
Clerk of Inferior Court Fees.....	
Sheriff's Fees.....	
Justice of Peace Fees.....	
Constable's Fees.....	
Fees and Costs in Inferior Court.....	.
Total Fees and Costs.....	9 90.
Judgment.....	
10 Per Cent Damages.....	
Interest.....	
Total Judgment.....	
Total Fees, Costs and Judgment.....	
Total.....	