

1611

STATE OF ALABAMA

X

SUMMONS AND COMPLAINT

BALDWIN COUNTY

X

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

You are hereby commanded to summon
KOEHLER MOTOR CO., A CORPORATION, and ZENO SCOTT to appear in the
Circuit Court of Baldwin County, Alabama, at the place of holding
the same and plead, answer, or demur, within thirty days from
service hereof to the complaint of CUBIE DEAN BELL, a minor, suing
by her next friend, A. H. BELL.

Witness this 7th day of February, 1951.

Herschel R. Smith
CLERK

C O M P L A I N T

CUBIE DEAN BELL, a minor, X
suing by her next friend, X
A. H. BELL, X

X

X

KOEHLER MOTOR CO., A CORP-
ORATION, and ZENO SCOTT,

X

VS. X

PLAINTIFF

X

X

DEFENDANTS

COUNT ONE:

Now comes the plaintiff, Cubie Dean Bell,
a minor, suing by her next friend, A. H. Bell, and claims of the
defendants the sum of FIVE HUNDRED (\$500.00) DOLLARS as damages
for in this, that on, to-wit, the 26th day of November, 1950,
the defendant, Zeno Scott, negligently drove an automobile truck
over, on or against an automobile in which the plaintiff was then
and there riding, on a public highway East of Foley, Baldwin
County, Alabama, said Zeno Scott then and there being an agent or
servant of the defendant, Koehler Motor Co., a corporation, and then
and there acting in the line and scope of his authority. The
plaintiff avers that she was thrown from the car and was cut,
lacerated and bruised, and suffered a concussion, and was caused
to expend large sums of money for hospital bills and doctor bills
curing her injury; the plaintiff avers that the injuries suffered

by her were the proximate result of the negligence of Zeno Scott acting in the line and scope of his authority as an agent, servant or employee of Koehle Motor Co., a corporation.

Hence this suit.

Frank G. Horne
Attorney for plaintiff

We accept service of the
above ~~De~~ Complaints and
waive further service by the
Sheriff of Baldwin County
Feb 7, 1951

Koehle Motor Co.
By Eugene A. Koehle
President

701611

FILED
FEB 7 1951
ALICE J. DUCK, Clerk

STATE OF ALABAMA
BALDWIN COUNTY

SUMMONS AND COMPLAINT

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

You are hereby commanded to summon
KOEHLIE MOTOR CO., A CORPORATION, and ZENO SCOTT to appear in the
Circuit Court of Baldwin County, Alabama, at the place of holding
the same and plead, answer, or demur, within thirty days from
service hereof to the complaint of CUBIE DEAN BELL, a minor, suing
by her next friend, A. H. BELL.

Witness this 3rd day of February, 1951.

Wm. J. Rucker
CLERK

C O M P L A I N T

CUBIE DEAN BELL, a minor, I	I	KOEHLIE MOTOR CO., A CORP-
suing by her next friend,		ORATION, and ZENO SCOTT,
A. H. BELL,	I VS. I	
PLAINTIFF	I	I DEFENDANTS

COUNT ONE: Now comes the plaintiff, Cubie Dean Bell,
a minor, suing by her next friend, A. H. Bell, and claims of the
defendants the sum of FIVE HUNDRED (\$500.00) DOLLARS as damages
for in this, that on, to-wit, the 26th day of November, 1950,
the defendant, Zeno Scott, negligently drove an automobile truck
over, on or against an automobile in which the plaintiff was then
and there riding, on a public highway East of Foley, Baldwin
County, Alabama, said Zeno Scott then and there being an agent or
servant of the defendant, Koehle Motor Co., a corporation, and then
and there acting in the line and scope of his authority. The
plaintiff avers that she was thrown from the car and was cut,
lacerated and bruised, and suffered a concussion, and was caused
to expend large sums of money for hospital bills and doctor bills
curing her injury; the plaintiff avers that the injuries suffered

1101

by her were the proximate result of the negligence of Zeno Scott acting in the line and scope of his authority as an agent, servant or employee of Koehle Motor Co., a corporation.

Hence this suit.

Frank J. Harne
Attorney for plaintiff

RECEIVED
JUL 1 1917

1101

FILED
FEB 7 1951
ALICE J. DUCK, Clerk

no 1611

RECEIVED FOR DIRECTOR
JAN 24 1951
JAN 24 1951
JAN 24 1951

of employee of West's Hotel Co's collection
of employee of West's Hotel Co's collection
of employee of West's Hotel Co's collection
of employee of West's Hotel Co's collection

1611