

1511

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Albert D. Fox and John Samuel Hudson, 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 McArthur Green.

WITNESS my hand, this 13th day of June, 1950.

Clarence J. Smith
Clerk

MCARTHUR GREEN

PLAINTIFF

VS

ALBERT D. FOX AND JOHN
SAMUEL HUDSON
DEFENDANTS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

1.

The Plaintiff claims of the Defendants ONE THOUSAND (\$1000.00) DOLLARS, as damages, for that heretofore on to-wit, June 11, 1950, the Plaintiff was operating his automobile along highway No. 90, a public highway in Baldwin County, Alabama, at a point approximately twelve miles East of Robertsedale, and near Siminole, in Baldwin County, Alabama, that at said time and place the defendants Albert D. Fox acting by and through his agent, servant or employee, John Samuel Hudson, who was then and there acting within the line and scope of his employment so negligently operated an automobile truck as to cause the same to run into or against the automobile of the Plaintiff, at said time and place and as a proximate result of the said negligence the Plaintiff's automobile was damaged as follows:

The right back wheel was broken; the right side was bent, torn and broken; the glasses were broken; the right front wheel was bent; the frame was bent; the said automobile of the Plaintiff was otherwise damaged; all to the damage of the Plaintiff, hence this suit.

Clarence J. Smith
Attorney for the Plaintiff

The Plaintiff demands a trial by jury.

Clarence J. Smith

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Albert D. Fox and John Samuel Hudson, 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 Mary Frances Green, a minor, acting by and through her father and next friend McArthur Green.

WITNESS my hand, this 13th day of June, 1950.

Alice J. Hensck
Clerk

MARY FRANCES GREEN, A minor
acting by and through her
father and next friend
McArthur Green,

PLAINTIFF

VS

ALBERT D. FOX AND
JOHN SAMUEL HUDSON

DEFENDANTS

Q

Q

Q

Q

Q

Q

Q

Q

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

L.

The Plaintiff, a minor twenty-two months old, acting by and through her father and next friend McArthur Green, claims of the defendant TWENTY FIVE HUNDRED (\$2500.00) DOLLARS, as damages, for that heretofore on to-wit, June 11, 1950, the Plaintiff was riding in an automobile on or along Highway 90, a public highway in Baldwin County, Alabama, near Seminole; that at said time and place the Defendant Albert D. Fox acting by and through his agent, servant or employee John Samuel Hudson who was then and there acting within the line and scope of his employment so negligently operated an automobile truck as to cause the same to run into or against an automobile in which the Plaintiff was riding, and as a proximate result of said negligence the Plaintiff was injured as follows:

700 1570

MARY FRANCES GREEN, A MINOR
ACTING BY AND THROUGH HER
FATHER AND NEXT FRIEND,
ARTHUR GREEN,

PLAINTIFF

VS

ROBERT D. FOX AND
JOHN SAMUEL HUDSON

DEFENDANTS

VERIFICATION AND COMPLAINT

FILED

FILED

JUN 13 1950

ALICE J. DUCK, Clerk

caused to enter and was injured; she was caused to enter doctor's office; she was
caused to enter and was injured; her collar bone was broken; she was

Verified for the Plaintiff

Verified for Defendant

McARTHUR GREEN,

Plaintiff,

VS.

ALBERT D. FOX AND JOHN

SAMUEL HUDSON,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW. NUMBER 1511.

Appeared:

For Plaintiff

Hon. H. M. Hall

For Defendant:

Defendant not in Court.

Mr. McArthur Green, having been first duly and legally sworn,
testified as follows:

ON DIRECT EXAMINATION

By Mr. Hall

Q. Mr. Green, on June 11, 1950, your car was wrecked, that the date?

A. Yes sir.

Q. You had bought that car sometime ago?

A. Yes sir.

Q. What was the fair and reasonable market value of that car at the
time of the wreck?

A. It would have sold for about Seven Hundred Dollars.

Q. Was that the fair and reasonable market value for it?

A. Yes sir.

COURT'S CHARGE TO THE JURY

Gentlemen, you have heard the testimony here. This is a suit
against a man involved in a wreck, for damages to the Plaintiff's
car. The Defendant has not seen fit to answer and you are now
executing what is known as a Writ of Inquiry and it will be your duty
to consider this matter and to assess such damages as you think the
Plaintiff has sustained.

After considering the matter and deliberating, when you have arrived at a fair and just verdict, please write your verdict on the back of the complaint, "We the Jury find for the Plaintiff and assess his damages at such and such amount", not more than the amount sued for, and let one of your number sign it as Foreman and bring it back.

I, Ora S. Nelson, Court Reporter, Baldwin County, Alabama, hereby certify that the foregoing is a true and correct copy of the evidence as taken and transcribed in the trial of said cause on October 30, 1950.

This 7th day of November, 1950.

Ora S. Nelson
Court Reporter

FILED

NOV 9 1950

ALICE J. DUCK, Clerk

STATE OF ALABAMA

BALDWIN COUNTY

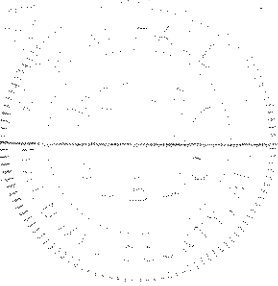
Before me, the undersigned authority, in and for said county, in said State, personally appeared McArthur Green, who is known to me and who having been by me first duly sworn, deposes and says that Albert D. Fox and John Samuel Hudson are justly indebted to the said McArthur Green the sum of ONE THOUSAND (\$1000.00) DOLLARS which said sum is justly due and that the said Albert D. Fox and John Samuel Hudson are non-residents of the State of Alabama, and that this attachment is not sued out for the purpose of vexing or harassing the said Defendants.

McArthur Green

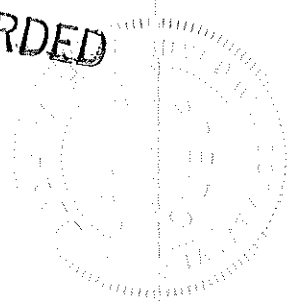
Sworn to and subscribed before me on this the 13th day of June, 1950.

Wm. L. Lee

Notary Public, Baldwin County, Ala.



7201570 RECORDED



MCARTHUR GREEN

PLAINTIFF

VS

ALBERT D. FOX AND
JOHN SAMUEL HUDSON

DEFENDANTS

AFFIDAVIT

FILED

JUN 13 1950

Filed ALICE J. DUCK, Clerk

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Albert D. Fox and John Samuel Hudson, 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 McArthur Green.

WITNESS my hand, this 13th day of June, 1950.

Reis J. Church
Clerk

McARTHUR GREEN

PLAINTIFF

VS

ALBERT D. FOX AND JOHN

SAMUEL HUDSON

DEFENDANTS

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

I.

The Plaintiff claims of the Defendants ONE THOUSAND (\$1000.00) DOLLARS, as damages, for that heretofore on to-wit, June 11, 1950, the Plaintiff was operating his automobile along highway No. 90, a public highway in Baldwin County, Alabama, at a point approximately twelve miles East of Robertsdale, and near Siminole, in Baldwin County, Alabama, that at said time and place the defendants Albert D. Fox acting by and through his agent, servant or employee, John Samuel Hudson, who was then and there acting within the line and scope of his employment so negligently operated an automobile truck as to cause the same to run into or against the automobile of the Plaintiff, at said time and place and as a proximate result of the said negligence the Plaintiff's automobile was damaged as

follows:

The right back wheel was broken; the right side was bent, torn and broken; the glasses were broken; the right front wheel was bent; the frame was bent; the said automobile of the Plaintiff was otherwise damaged; all to the damage of the Plaintiff, hence this suit.

Samuel Hudson
Attorney for the Plaintiff

The Plaintiff demands a trial by jury.

Samuel Hudson

Received in Sheriff's Office
this 13 day of June 1950
TAYLOR WILKINS, Sheriff

Executed 6-20 1950
by serving copy of within Summons and
Complaint on

Albert D. Fox

Taylor Wilkins Sheriff
By W. F. Hall Deputy Sheriff

MARTIN GREEN

PLAINTIFF

VS

ALBERT D. FOX AND
JOHN SAMUEL HUDSON

DEFENDANTS

SUMMONS AND COMPLAINT

FILED

JUN 13 1950

ALICE J. DUCK, Clerk

FILED:

NO 1510
RECORDED

We the jury find Albert D. Fox
guilty and recommend
that the Plaintiff be awarded \$500.00 for damages
that he has suffered.

Louis Ferguson
for man

We the jury find the Defendant
Albert D. Fox guilty, and
award the damages at \$500.00.

Louis Ferguson
for man

Not found in my county after diligent search and in-
quiry. W. F. Hall
By W. F. Hall Deputy Sheriff
Tayler Wilkins, Sheriff
24 day of June 1950

ATTACHMENT.

The State of Alabama,
Baldwin County

TO ANY SHERIFF OF THE STATE OF ALABAMA:

WHEREAS, McArthur Green

Alice J. Duck
hath complained on oath to me, ~~ROBERT S. DUCK~~, Clerk of Circuit Court of Baldwin County, Ala.,

that Albert D. Fox and John Samuel Hudson

is justly indebted to the Plaintiff McArthur Green

in the sum of ONE THOUSAND (\$1,000.00)

Dollars, and

McArthur Green

(out of State
having made affidavit and ~~given bond~~

no bond required)

as required by law, in such cases, you are hereby commanded to attach so much of the estate of

Albert D. Fox and John Samuel Hudson

as will be of value sufficient to satisfy said debt and costs, according to the complaint; and such estate, so attached unless replevied, so to secure, that the same may be liable to further proceedings thereon to be had by the Circuit Court of Baldwin County, Ala., at a term thereof, to be held at the Court House of said

County, on Monday of June 19350

next; when and where you must make known to said Court how you have executed this Writ.

WITNESS. my hand, this 11th day of June A. D. 19350

Alice J. Duck Clerk.

Received in Sheriff's Office
this 14 day of June 1950
TAYLOR WILKINS, Sheriff

RECORDED

No. 1670

ATTACHMENT

McArthur Green

Vs. { ATTACHMENT

Albert D. Fox &
John Samuel Hudson

Issued June 11, 1935

MOORE PRINTING CO.,

1947 Red Chev
Horn Trailer
7th Reg

Executed by 6-14-50
By attaching one 1947
Chev Horn & Trailer
tag no 56 2060
5L-119 Trailer tag
Taylor Wilkins Sheriff
147 Hall D.S.

Found in my county after diligent search and in-
y. as to John Samuel Hudson
Taylor Wilkins, Sheriff

By 147 Hall
Deputy Sheriff

151