

1520

AMENDED SUBPOENS AND COMPLAINT

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU ARE HEREBY COMMANDED to summon OBIDIAH PULLIAN, to appear within thirty days from the service of this writ in the Circuit Court, to be held for said County at place of holding the same, then and there to answer the complaint of JOHN FORGAC.

WITNESS my hand this the 25<sup>th</sup> day of Sept, 1951.

Reverend J. V. Vuck  
CLERK OF THE CIRCUIT COURT.

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JOHN FORGAC  
Plaintiff  
  
vs  
  
OBIDIAH PULLIAN  
Defendant

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IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
  
AT LAW.

1.

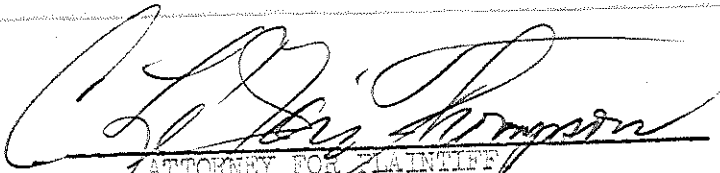
The Plaintiff claims of the Defendant the sum of FIVE HUNDRED (\$500.00) DOLLARS as damages for that heretofore, on to-wit, January 30, 1950, one Charles O'Hevie, whose name to your Complainant is otherwise unknown, an agent, servant or employee of the Defendant, while acting within the line and scope of his authority as such, was operating an automobile truck, upon and along a public road in Baldwin County, Alabama near the home of your Complainant, that at said time and place said servant, agent or employee of the Defendant, while acting within the line and scope of his authority negligently caused or negligently allowed an automobile truck to run upon or against a cow, of the value of FIVE HUNDRED (\$500.00) DOLLARS causing the death of said cow; which cow was being driven together with numerous other cattle across the road by your Complainant from the pasture of your Complainant to the Complainant's lot.

2.

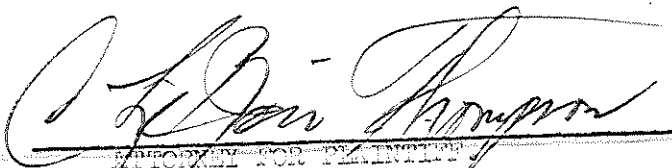
The Plaintiff claims of the Defendant the sum of FIVE HUNDRED (\$500.00) DOLLARS as damages for that heretofore, on to-wit, January 30, 1950, one Charles O'Hevie, whose name to your Complainant is otherwise unknown, an agent, servant or employee of the Defendant, while acting within the line and scope of his authority as such, was operating an automobile truck,

upon and along a public road in Baldwin County, Alabama near the home of your Complainant, that at said time and place said servant, agent or employee of the Defendant, while acting within the line and scope of his authority wantonly caused or wantonly allowed an automobile truck to run upon or against a cow, of the value of FIVE HUNDRED (\$500.00) DOLLARS causing the death of said cow; which cow was being driven together with numerous other cattle across the road by your Complainant from the pasture of your Complainant to the Complainant's lot.

Plaintiff avers that all of said injuries and damages herein set out are the proximate result of the wanton conduct of the said Charles O'Hervie at the time and in the manner herein set out which said wanton conduct consisted in this: Said Charles O'Hervie while acting within the line and scope of his authority did wantonly cause or wantonly allow an automobile truck to run upon or against a cow, of the value of FIVE HUNDRED (\$500.00) DOLLARS causing the death of said cow; and hence this suit.

  
ATTORNEY FOR PLAINTIFF

Plaintiff demands trial by jury.

  
ATTORNEY FOR PLAINTIFF

FILED  
JAN 12 1914  
BALDWIN COUNTY, ALA.

no 1520  
John Torgue  
vs.  
Credlyke Pulliam

executed 10-7-51 19 1  
copy of within Summons and  
affidavit on

Credlyke Pulliam

Taylor Wilkins Sheriff  
H. F. Hall Deputy Sheriff

amended Complaint

FILED  
SEP 25 1951  
ALICE J. DUCK, Clerk

STATE OF ALABAMA  
BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU ARE HEREBY COMMANDED to summon OVERDIKE PULLIAN, to appear within thirty days from the service of this writ in the Circuit Court, to be held for said County at place of holding the same, then and there to answer the complaint of JOHN FORGAC.

WITNESS my hand this the 22<sup>nd</sup> day of June, 1950.

Desiret. W. Clark  
CLERK OF THE CIRCUIT COURT


JOHN FORGAC            §  
    Plaintiff           §  
VS                     §  
OVERDIKE PULLIAN       §  
    Defendant.         §

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY AT LAW.

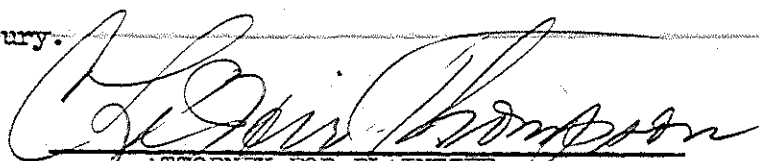
1. The Plaintiff claims of the defendant the sum of FIVE HUNDRED (\$500.00) DOLLARS as damages for that heretofore, on to-wit, January 30, 1950, one Charles O'Hevie, whose name to your complainant is otherwise unknown, an agent, servant or employee of the defendant, while acting within the line and scope of his authority as such, was operating an automobile truck, upon and along a public road in Baldwin County, Alabama near the home of your complainant, that at said time and place said servant, agent or employee of the defendant, while acting within the line and scope of his authority negligently caused or negligently allowed an automobile truck to run upon or against a cow, of the value of FIVE HUNDRED (\$500.00) DOLLARS causing the death of said cow; which cow was being driven together with numerous other cattle across the road by your complainant from the pasture of your complainant to the complainant's lot.

2. The Plaintiff claims of the defendant the sum of FIVE HUNDRED (\$500.00) DOLLARS as damages for that heretofore, on to-wit, January 30, 1950, one Charles O'Hevie, whose name to your complainant is otherwise unknown, an agent, servant or employee of the defendant, while acting within the line and scope of his authority as such, was operating an automobile truck, upon and along a public road in Baldwin County, Alabama near the home of your complainant, that at said time and place said servant, agent or employee of the defendant, while acting within the line and scope of his authority wantonly caused or wantonly allowed an automobile truck to run upon or against a cow, of the value of FIVE HUNDRED (\$500.00) DOLLARS causing the death of said cow; which cow was being driven together with numerous other cattle across the road by your complainant from the pasture of your complainant to the complainant's lot.

Plaintiff avers that all of said injuries and damages herein set out are the proximate result of the wanton conduct of the said Charles O'Hervie at the time and in the manner herein set out which said wanton conduct consisted in this: Said Charles O'Hervie while acting within the line and scope of his authority did wantonly cause or wantonly allow an automobile truck to run upon or against a cow, of the value of FIVE HUNDRED (\$500.00) DOLLARS causing the death of said cow; and hence this suit.

  
ATTORNEY FOR PLAINTIFF

Plaintiff demands trial by jury.

  
ATTORNEY FOR PLAINTIFF

RECORDED

NO 1520 6-28-50

John Horgas  
Plaintiff

Vs

Overshike Pulliam  
Defendants

Summons + Complaint

FILED

JUN 22 1950

ALICE J. DUCK, Clerk

Received in Sheriff's Office

at Ray, June 1950

TAYLOR WILKINS, Sheriff

Executed June 28-1950

By Serving Copy on

Overshike Pulliam

Sheriff

Taylor Wilkins

By

Edwigh Steadham