

1718

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon W. E. PENRY SR., and W. E. PENRY JR., 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 Jane Matthews, a minor by Charles L. Matthews, as father and next friend.

WITNESS my hand this the 19th day of October, 1951.

Archie L. Welch
Clerk

JANE MATTHEWS, a minor by Charles
L. Matthews, as father and next
friend,

PLAINTIFF

VS

W. E. PENRY SR., AND
W. E. PENRY JR.

DEFENDANTS

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

1.

The Plaintiff, Jane Matthews, a minor seventeen years of age, by Charles L. Matthews as her father and next friend, claims of the defendants, FIVE HUNDRED (\$500.00) DOLLARS, as damages, for that heretofore to-wit, March 18, 1951, the Plaintiff was riding in an automobile belonging to the Defendant W. E. Penry Sr., which was then and there being operated by W. E. Penry Jr., Servant, agent or employee of the Defendant, and while acting within the line and scope of his employment; that the said W. E. Penry Jr., so negligently operated the said automobile which he was driving at said time and place as to cause it to run into an automobile which was being driven along said highway at said time and place and as a proximate result and consequence of the negligence on the part of the said W. E. Penry Jr., the agent, servant or employee of the Defendant, W. E. Penry Sr., and while acting within the line and scope of his employment, the Plaintiff was injured as follows: four teeth were knocked out; her body was bruised and she was otherwise injured.

Jane Mathew
By Charles L. Mathew

no 1718

RECORDED

Filed 10-19-51
Alice J. Menck
J. C. Menck

JANE MATTHEWS, a minor by Charles
L. Matthews, as father and next
friend,

PLAINTIFF

VS

W. E. PENRY SR., AND
W. E. PENRY JR.

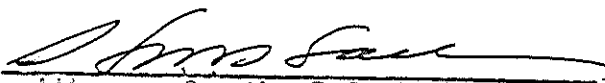
DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

Now comes the Defendant, W. E. Penry Sr., and consents that judgment
be entered against him in the above styled cause, and that the Plaintiff
damages be fixed at FIVE HUNDRED (\$500.00) DOLLARS.


Attorney for the Defendant

RECORDED

Filed 10-19-51
Alice J. [unclear]
Clerk

1718