

ELIZABETH ANN RUSSELL, a  
minor suing by and through  
JOHN M. RUSSELL; father  
and next friend,

PLAINTIFF,

vs.

CARLOS M. WARD,

DEFENDANT.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW

No.

1736

4401736  
Comes the defendant in the above styled cause and  
for answer to plaintiff's complaint says:

1. Not guilty.
2. The allegations of the complaint are untrue.

McCORVEY, TURNER, ROGERS, JOHNSTONE & ADAMS

By

*N. Adams*

Attorneys for Defendant

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AND NEW YORK  
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IN THE DISTRICT COURT OF

THE STATE OF NEW YORK

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NO

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FILED

NOV 14 1951

ALICE J. DICK, Clerk

FOR SERVICE OF PROCESS OF  
COMES AND APPEARS AND  
brought on the case and  
brought on the case and

1. FOR SERVICE

2. THE APPEAL IS TO BE  
SUSTAINED AND THE  
JUDGMENT IS REVERSED

3. THE APPEAL IS TO BE  
SUSTAINED AND THE  
JUDGMENT IS REVERSED

4. THE APPEAL IS TO BE  
SUSTAINED AND THE  
JUDGMENT IS REVERSED

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PLAINTIFF,

vs.

CARLOS M. WARD,


DEFENDANT.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

AT LAW

No. 1736

Plaintiff claims of the defendant the sum of Two Hundred Fifty and No/100 (\$250.00) Dollars as damages for that heretofore and on to-wit the 9th day of February, 1951, an agent, servant or employee of the defendant while acting within the line and scope of her authority as such so negligently operated an automobile on and along Church Street at or near its intersection with Fels Avenue/as to cause or allow the same to collide with an automobile in which plaintiff was then and there riding; and as a proximate consequence of said negligence the plaintiff was injured and bruised and her nervous system suffered a severe shock to the extent that she was permanently injured and damaged, WHEREFORE plaintiff sues.

  
Attorney for Plaintiff



ELIZABETH ANN RUSSELL, a  
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PLAINTIFF,

vs.

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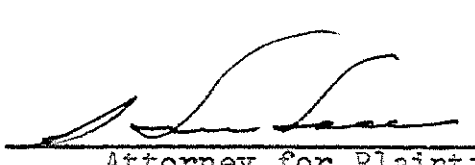
IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

AT LAW

No. 1736

Plaintiff claims of the defendant the sum of Two  
Hundred Fifty and No/100 (\$250.00) Dollars as damages for  
that heretofore and on to-wit the 9th day of February, 1951,  
an agent, servant or employee of the defendant while acting  
within the line and scope of her authority as such so negli-  
gently operated an automobile on and along Church Street at  
or near its intersection with Fels Avenue <sup>in Fairhope, Alabama,</sup> as to cause or  
allow the same to collide with an automobile in which  
plaintiff was then and there riding; and as a proximate  
consequence of said negligence the plaintiff was injured  
and bruised and her nervous system suffered a severe shock  
to the extent that she was permanently injured and damaged,  
WHEREFORE plaintiff sues.

  
Attorney for Plaintiff

No 1736

RECORDED FOR RETURN  


UNITED STATES DISTRICT COURT

to the extent that she has been named and caused  
and caused her name to be entered in the book  
consequence of said negligence the defendant has caused  
defendant was shot and there being; and as a consequence  
which she was so killed with an automatic in which  
which is sufficient to show that she was not  
defendant was shot and there being; and as a consequence

generally observed an automatic on the ground which was  
as to the nature of the evidence in this case, the  
defendant was shot and there being; and as a consequence

within the line and scope of her authority in which  
an effort to obtain or to see to the defendant which service  
and persons and on to the day of the defendant, 1921,  
defendant was shot and there being; and as a consequence

defendant was shot and there being; and as a consequence

DEFENDANT

UNITED STATES DISTRICT COURT

AS

DEFENDANT

UNITED STATES DISTRICT COURT

NO. 1736

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UNITED STATES DISTRICT COURT

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*N. Adams*

Attorneys for Defendant

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RECORDED

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ALICE J. DUCK, Clerk