

BLANCHE WILLIAMS, Father of
MYRA FAITH WILLIAMS, a minor
child,

Vs. Plaintiff.

FRANK CLAIRE BROWN,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
NO. 1817

NON-MILITARY AFFIDAVIT

STATE OF ALABAMA §

COUNTY OF BALDWIN §

BEFORE ME, the undersigned authority personally appeared
ROBERT T. CUNNINGHAM who is known to me and who by me being
first duly sworn doth depose and say as follows:

That he is attorney for the Complainant in the above
styled cause, which cause is now pending in the Circuit Court
of Baldwin County, Alabama; that Frank Claire Brown, who is
the Respondent in the above styled cause and who is in default
of any appearance therein is not at this time a person in the
Military Service of the United States or any branch of said
service.

Your affiant has recently talked with the said Defendant
and ascertained from him that he was not in the Military Ser-
vice and he has also talked with acquaintances of the said
Frank Claire Brown since the above occasion and has been ad-
vised by them that he is not in the Armed Forces of the United
States. Respondent is reported to reside in Bay Minette, Ala-
bama and is further reported to be employed at the Alabama Dry
Dock and Shipbuilding Company in Mobile, Alabama.

Robert T. Cunningham
ROBERT T. CUNNINGHAM

Sworn and subscribed to before me
this the 17th. day of September, 1952.

William E. Johnston
NOTARY PUBLIC, MOBILE COUNTY, ALABAMA.

Year	1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	2046	2047	2048	2049	2050	2051	2052	2053	2054	2055	2056	2057	2058	2059	2060	2061	2062	2063	2064	2065	2066	2067	2068	2069	2070	2071	2072	2073	2074	2075	2076	2077	2078	2079	2080	2081	2082	2083	2084	2085	2086	2087	2088	2089	2090	2091	2092	2093	2094	2095	2096	2097	2098	2099	2100
1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	2046	2047	2048	2049	2050	2051	2052	2053	2054	2055	2056	2057	2058	2059	2060	2061	2062	2063	2064	2065	2066	2067	2068	2069	2070	2071	2072	2073	2074	2075	2076	2077	2078	2079	2080	2081	2082	2083	2084	2085	2086	2087	2088	2089	2090	2091	2092	2093	2094	2095	2096	2097	2098	2099	2100	

RECORDED

Filed; 9-18-52.
J. J. M. Jr.
Judge

BLANCHE WILLIAMS, Father of
MYRA FAITH WILLIAMS, a deceased
minor child,

Plaintiff.

Vs.

FRANK CLAIRE BROWN,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

NO. _____

COUNT ONE

The Plaintiff claims of the Defendant the sum of \$50,000.00 for that heretofore and on, to-wit, the 25th. day of April, 1952, the Defendant did so negligently drive an automobile upon U. S. Highway #31 approximately 3.6 miles North of Spanish Fort, Alabama, said highway being then and there a public street or highway in Baldwin County, Alabama, as to cause or allow the vehicle he was driving to leave said public street or highway and run into, on, over, against or upon the premises occupied by the Plaintiff as a home and while in or upon or being driven over said premises said automobile ran into, over, upon, or against Myra Faith Williams a minor child of the Plaintiff, who was then six years of age and who was playing in said yard or property of the said Plaintiff, inflicting upon said minor child injuries which proximately caused her death on the same day, all to the damage of the Plaintiff in the sum aforesaid hence this suit.

COUNT TWO

The Plaintiff claims of the Defendant the sum of \$50,000.00 for this, that heretofore, and on to-wit April 25, 1952, the Defendant did so negligently drive an automobile upon U. S. Highway #31 at a point approximately 3.6 miles North of Spanish Fort, Alabama, said highway being then and there a public street or highway in Baldwin County, Alabama, as to cause or allow the vehicle he was driving to run into, on, over, against or upon Plaintiff's six year old child, Myra Faith Williams, who was then and there playing in the yard of the Plaintiff on the premises of the said Plaintiff and near the home of the Plaintiff, inflicting injuries upon the said Myra Faith Williams, causing her death on the same

day, all to the damage of the Plaintiff, in the sum aforesaid, hence this suit.

COUNT THREE

The Plaintiff claims of the Defendant the sum of \$50,000.00 for that heretofore and on, to-wit, the 25th. day of April, 1952, the Defendant willfully or wantonly caused the death of the Plaintiff's minor child, Myra Faith Williams, then six years of age, by willfully or wantonly causing the automobile he was driving upon U. S. Highway #31, at a point approximately 3.6 miles North of the Spanish Fort, Alabama, said highway being then and there a public street in Baldwin County, Alabama, to leave said public street or highway and run into, on, over, against or upon the premises occupied by the Plaintiff as a home and while in or upon or being driven over said premises to run into, on, over, upon or against Myra Faye Williams, who was then playing in said yard or property of the said Plaintiff, and as a direct and proximate consequence of said willful or wanton act of the said Defendant the minor child of the Plaintiff received injuries which proximately caused her death on the same day, all to the damage of the Plaintiff in the sum aforesaid, hence this suit.

COUNT FOUR

The Plaintiff claims of the Defendant the sum of \$50,000.00 for this, that heretofore, and on to-wit April 25, 1952, the Defendant willfully or wantonly caused the death of the Plaintiff's minor child, Myra Faith Williams, then six years of age, ^{by} willfully or wantonly causing the automobile he was driving on U. S. Highway #31 at a point approximately 3.6 miles North of Spanish Fort, Alabama, said highway being then and there a public street or highway in Baldwin County, Alabama, to run into, on, over, against or upon said child who was then and there playing in the yard of said Plaintiff on the premises of the said Plaintiff and near the home of the Plaintiff and as a direct and proximate consequence of the willful or wanton act of the Defendant the said

child received injuries causing her death on the same day, all to the damage of the Plaintiff in the sum aforesaid, hence this suit.

Robert T. Cunningham
ROBERT T. CUNNINGHAM
1502 Merchants Natl. Bank Bldg.
Mobile, Alabama
Attorney for Plaintiff.

Defendants address:

C/O W. S. Cruzan
Bay Minette, Alabama

Plaintiff demands a trial by Jury.

Robert T. Cunningham
Attorney for Plaintiff

we the jury charge the
defendant Frank Brown
\$15,000⁰⁰) Fifteen thousand dollars

Signed *Harold Page*

We the jury find for the Plaintiff
and against the Defendant, Frank
Claire Brown, and assess the
damages at \$15,000⁰⁰.

Harold Page
Foreman

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 1817

TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Frank Claire Brown

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against _____

Frank Claire Brown

Defendant

by Blanche Williams, Father of Myra Faith Williams, deceased minor child

Plaintiff.....

Witness my hand this 23rd day of June 1952..

Blanche Williams, Clerk

No. 1817

RECORDED

Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

BLANCHE WILLIAMS, Father of

MYRA FAITH WILLIAMS, a deceased
minor child

Plaintiffs

vs.

FRANK CLAIR BROWN

Defendants

SUMMONS and COMPLAINT

Filed 6-23, 1952

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

June 23, 1952

Taylor Wilkins, Sheriff

I have executed this summons

this 6-24, 1952

by leaving a copy with

Frank Clair Brown

Taylor Wilkins, Sheriff

George Hartley, Deputy Sheriff

CUNNINGHAM AND WILKINS
ATTORNEYS AT LAW
1502 MERCHANTS NATIONAL BANK BUILDING
MOBILE 11, ALABAMA

ROBERT T. CUNNINGHAM
ROBERT B. WILKINS

June 21, 1952

Clerk of the Circuit Court
County Courthouse
Bay Minette, Alabama

Dear Sir:

Re: Blanche Williams,
father of Myra Faith
Williams, a deceased
minor child vs. Frank
Claire Brown

Will you please file the enclosed complaint in
the above matter?

As you can see from the bill of complaint I am
asking for a jury trial in this matter.

Very truly yours,

CUNNINGHAM & WILKINS

Robert T. Cunningham

ROBERT T. CUNNINGHAM

RTC/alp

Encl: 1

701817

Jury ✓

Blanche Williams
father of Myra Faith Williams

vs.

Frank Claire Brown

Damages
Filed 6-23-52

Robert J. Cunningham

ELANCHE WILLIAMS, father of Myra
Faith Williams

Plaintiff

vs

FRANK CLAIRE BROWN

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

TO FRANK CLAIRE BROWN, DEFENDANT:

Take notice, that, whereas, the plaintiff in the above entitled cause has requested, in writing, the undersigned, as Clerk of said Court, to issue notice to you, as defendant, in the above entitled cause, and in the judgment therein, requiring y u to file a statement, in writing, under oath, of all your assets, as provided in Code 1940, Title 7, Section 903, and has filed said request, in writing, in this cause with the undersigned as Clerk of this Court, and it appearing from said request, and the record in said cause, that an execution was returned on the judgment in this cause on February 9, 1953, endorsed "no property found", by the Sheriff of Baldwin County, and that you reside in the State of Alabama.

Now, therefore, you are hereby required, within thirty days from the service hereof, to file in this Court, a statement, in writing, under oath, of all your assets, including money, choses in action, notes, bonds, and accounts, and all other property, real, personal or mixed, or any interest therein, with item thereof, together with a detailed list or statement, of any and all liens, mortgages or incumbrances thereon showing the amounts due upon each, and the owner or holder of such liens, encumbrances or mortgages.

Witness my hand this 10th day of Feb, 1954.

Reese J. Smith
Clerk, Circuit Court

TO ANY SHERIFF OF THE STATE OF ALABAMA--GREETING:

You are hereby commanded to serve the foregoing notice upon Frank Claire Brown, defendant, and make due return of your said service and of this notice, within thirty days from this date, how you have executed the same.

Witness my hand this 10th day of Feb, 1954.

Reese J. Smith
Clerk, Circuit Court.

Received in Sheriff's Office
this 10 day of Feb, 1954
TAYLOR WILKINS, Sheriff

1817

BLANCHE WILLIAMS, father of Myra
Faith Williams

Plaintiff

VS

FRANK CLAIRE BROWN

Defendant

Received _____ day of _____ 19____
and on 11 day of Feb 1954
I served a copy of the within _____
on _____

By service on Frank Claire Brown

TAYLOR WILKINS, Sheriff
By John D. Sellers, S.

FILED
FEB 10 1954
ALICE J. DUCK, Clerk

From the law offices of
C. LeNoir Thompson
Bay Minette, Alabama

BLANCHE WILLIAMS, father of Myra
Faith Williams

Plaintiff

vs

FRANK CLAIRE BROWN

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

TO FRANK CLAIRE BROWN, DEFENDANT:

Take notice, that, whereas, the plaintiff in the above entitled cause has requested, in writing, the undersigned, as Clerk of said Court, to issue notice to you, as defendant, in the above entitled cause, and in the judgment therein, requiring you to file a statement, in writing, under oath, of all your assets, as provided in Code 1940, Title 7, Section 903, and has filed said request, in writing, in this cause with the undersigned as Clerk of this Court, and it appearing from said request, and the record in said cause, that an execution was returned on the judgment in this cause on February 9, 1953, endorsed "no property found", by the Sheriff of Baldwin County, and that you reside in the State of Alabama.

Now, therefore, you are hereby required, within thirty days from the service hereof, to file in this Court, a statement, in writing, under oath, of all your assets, including money, choses in action, notes, bonds, and accounts, and all other property, real, personal or mixed, or any interest therein, with item thereof, together with a detailed list or statement, of any and all liens, mortgages or incumbrances thereon showing the amounts due upon each, and the owner or holder of such liens, encumbrances or mortgages.

Witness my hand this 10th day of Feb, 1954.

Alicia J. Resnick
Clerk, Circuit Court

TO ANY SHERIFF OF THE STATE OF ALABAMA—GREETING:

You are hereby commanded to serve the foregoing notice upon Frank Claire Brown, defendant, and make due return of your said service and of this notice, within thirty days from this date, how you have executed the same.

Witness my hand this 10th day of Feb, 1954.

Alicia J. Resnick
Clerk, Circuit Court.

TO THE HONORABLE JUDGE OF THE
COURT OF THE DISTRICT OF COLUMBIA
WASHINGTON, D.C.

STATE OF MARYLAND, DISTRICT OF COLUMBIA
JANUARY 27, 1954

27

Subscribed

THOMAS EDWARD KRAMER

THOMAS EDWARD KRAMER

THOMAS EDWARD KRAMER

THOMAS EDWARD KRAMER
and
JAMES EDWARD KRAMER
Plaintiffs
vs.
FRANK CLAUDE BROWN
Defendant

THOMAS EDWARD KRAMER
and
JAMES EDWARD KRAMER
Plaintiffs
vs.
FRANK CLAUDE BROWN
Defendant

FILED
JAN 27 1954
U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

From the law offices of
Cl LeNoir Thompson
Bay Minette, Alabama

THOMAS EDWARD KRAMER
and
JAMES EDWARD KRAMER
Plaintiffs
vs.
FRANK CLAUDE BROWN
Defendant

THOMAS EDWARD KRAMER
and
JAMES EDWARD KRAMER
Plaintiffs
vs.
FRANK CLAUDE BROWN
Defendant

BLANCHE WILLIAMS, father of Myra
Faith Williams

Plaintiff

vs

FRANK CLAIRE BROWN

Defendant

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

TO THE CLERK OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA:

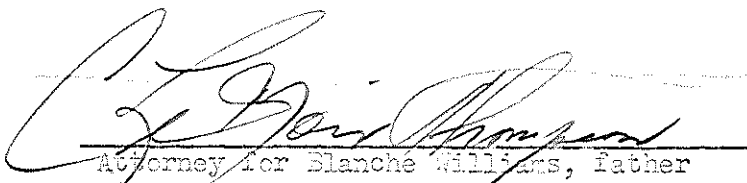
Whereas, in the above entitled cause Blanche Williams, father of Myra Faith Williams did recover a judgment against Frank Claire Brown on October 13, 1952 for the sum of \$15,000.00, besides the cost of said cause;

Whereas execution was issued on said judgment against the said Frank Claire Brown on the 30th day of December, 1952, and on February 9, 1953, said execution was returned with the endorsement thereon "no property found", and said judgment remains unpaid and unsatisfied; now therefore,

This is to request you as Clerk of the said Circuit Court of Baldwin County, Alabama, to issue a notice to the said Frank Claire Brown requiring him to file in this Honorable Court, within thirty days from the service of such notice, a statement in writing, under oath, of all the assets of the said Frank Claire Brown, including money, choses in action, notes, bonds, and accounts, and all other property, real, personal, or mixed, or any interest therein, with a detailed description of the same, the location, and reasonable value of each item thereof, together with a detailed statement of any and all liens, mortgages, or incumbrances thereon, showing the amounts due upon each, and the owner or holder of such liens, incumbrances or mortgages.

The said Frank Claire Brown resides near Daphne, Alabama, Baldwin County, State of Alabama.

Dated February 9, 1954.


Attorney for Blanche Williams, father
of Myra Faith Williams,
Plaintiff and Judgment Creditor.

1817

ELANCHE WILLIAMS, father of Myra
Faith Williams

Plaintiff

VS

FRANK CLAIRE BROWN

Defendant

FILED

FEB 20 1954

JOHN A. DICK, Clerk

From the law offices of
C. LeHoir Thompson
Day Minette, Alabama

CIRCUIT COURT OF BALDWIN COUNTY

BAY MINETTE, ALABAMA

I, F. C. Browne, declare under oath that I have
no assets, of any nature, property, monies, property
real or personal or mixed mortgages or encumbrances of
any nature, nor any bonds or notes.


F. C. Browne

*sworn to and subscribed to
before me on March 9, 1934.
Ray J. Walters, Jr.
Notary Public, State of Ala. at Large*

1817

1817

FILED

MAR 9 1954

ALICE J. DICK, CLERK