D. W. RHODES,	)(	
Plaintiff,	)(	IN THE CIRCUIT COURT OF
-vs-	)(	BALDWIN COUNTY, ALABAMA
SNELLGROVE BROTHERS, a Partnership, and J. P. HALL,	)(	LAW SIDE.
Defendants.	)(	

1932

INTERROGATORIES PROPOUNDED BY PLAINTIFF TO DEFENDANT, SNELLGROVE BROTHERS

1. What is the correct name of the concern sometimes known as Snellgrove Brothers?

2. State whether or not such concern was a partnership on April 29, 1952, and if you say that it was, state the names of the partners of the firm, their address, and whether they are general partners or limited partners.

3. State whether or not such concern was a corporation on April 29, 1952, and if you say that it was, specify the State in which the concern was incorporated and the officer of said corporation designated to receive service of Summons and Complaint.

4. State whether or not such concern was a sole proprietorship on April 29, 1952, and if you say that it was, specify the name of the sole proprietor and his address.

5. Is the correct address of Snellgrove Brothers New Brockton, Alabama, and if you say that it is not, please give the correct address.

6. Was the c oncern known as Snellgrove Brothers the owner on April 29, 1952, of a 1951 Model Chevrolet truck with 1952 license registration plates 19 H/2 837, Alabama registration?

7. Was this truck involved in a collision on April 29, 1952, on Alabama Highway #89, approximately 1½ miles West of the limits of the town of Foley, Baldwin County, Alabama?

C. G. C.

8. Was the truck at that time driven by J. P. Hall?

9. Was J. P. Hall employed by the concern of Snellgrove Brothers as a truck driver?

10. Was J. P. Hall, at the time and place of the collision referred to in Paragraph 7 heretofore, an agent, servant or employee of the concern of Snellgrove Brothers and was he acting within the line and scope of his employment as such agent, employee or servant?

11. What is the present residence or Post Office address of J. P. Hall?

C. G. Chason
Attorney for Plaintiff

STATE OF ALABAMA
BALDWIN COUNTY

Before me, Charles J. Elliott Jr., a Notary Public in and for said State and County personally appeared C. G. Chason, attorney of record for the Plaintiff, who, upon being first duly sworn on oath deposes and says that the answers to the foregoing interrogatories, if well and truthfully made, will be material evidence in the above action.

C. G. Chason

Sworn to and subscribed before me
on this the 9th day of March,
1953.

Charles J. Elliott Jr.
Notary Public, Baldwin County
State of Alabama

C. G. C.

Received in Sheriff's Office
This 9 day of Mar. 53
TAYLOR WILKINS, Sheriff

Executen this 11 day of March 1953 by leaving a copy of the within writ with Snellgrove Bros -

H D Tillman
Sheriff

by F F Gunter
D.S.

INTERROGATORIES PROPOUNDED BY PLAINTIFF TO DEFENDANT, SNELLGROVE BROTHERS

D. W. RHODES,
PLAINTIFF,

-VS-

SNELLGROVE BROTHERS, a Partnership, and J. P. HALL,
DEFENDANTS.

()

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

FILED
3-9-53
ALICE J. DUCK, Clerk

CECIL G. CHASON
ATTORNEY AT LAW
FOLEY, ALABAMA

CECIL G. CHASON
ATTORNEY AT LAW
FOLEY, ALABAMA

March 2, 1953

Mrs. Alice J. Duck, Clerk
Bay Minette, Alabama

Dear Mrs. Duck:

Enclosed herewith is Summons and Complaint in the case of D. W. Rhodes -vs- Snellgrove Brothers, a partnership, and J. P. Hall.

Very truly yours,

C. G. Chason

CGC:fm

encls. 3

No 1933 Jury

W. W. Rhodes

vs.

Snellgrove Brothers
& J. P. Hall

Damages

Filed 3-4-53

C. H. Chasm

D. W. RHODES, Plaintiff, VS. SNELLGROVE BROTHERS, a Partnership, and J. P. HALL, Defendants.	)	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW. NO. 1933.

ANSWERS TO INTERROGATORIES

Now comes the Defendant, Snellgrove Brothers, and for answers to the interrogatories propounded to him by the Plaintiff in this cause, says:

1. Snellgrove Brothers
2. (A) Yes
   (B) Roscoe Snellgrove and Stricklin Snellgrove
   (C) New Brockton, Alabama, Route 2
   (D) General Partnership
3. Answered above
4. Answered above
5. Answered above
6. Yes
7. Yes
8. Yes
9. Yes
10. Yes
11. J. P. Hall is not new employed by Snellgrove Brothers but it is out information and belief and on such information and belief, we state that his address is Brundridge, Alabama.

SNELLGROVE BROTHERS

By: Stricklin Snellgrove

Defendant

STATE OF ALABAMA)
COFFEE COUNTY)

Before me, the undersigned authority, within and for said County and State, personally appeared Stricklin Snellgrove, who

first being by me duly and legally sworn, deposes and says: That he has read over the foregoing answers to interrogatories and that the same are true.

Sworn to and subscribed before me on this the 13 day of April, 1953.

Notary Public, Coffee County, Alabama

ANSWERS TO INTERROGATORIES

D. W. RHODES,

Plaintiff,

VS.

SNELLGROVE BROTHERS, a Partnership, and J. P. HALL,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW. NO. 1933.

FILED

11-27-53

ALICE J. DUCK, Clerk

D. W. RHODES, Plaintiff,	)	IN THE CIRCUIT COURT OF
VS.	)	BALDWIN COUNTY, ALABAMA
SNELLGROVE BROTHERS, A Partnership, and J. P. HALL, Defendants.	)	AT LAW NO. 1933

DEMURRER

Come the defendants in the above styled cause and demurs to the plaintiff's complaint and to each count thereof, separately and severally, upon the following separate and several grounds:

1. It does not state a cause of action.

2. It alleges that Snellgrove Brothers is a partnership, yet does not allege the names of the partners.

3. It does not allege that the partnership described as Snellgrove Brothers is a general partnership or a limited partnership.

4. Because said count is vague, indefinite and uncertain.

J. B. Blackburn

Attorney for defendants.

FILED

4-2-53

ALICE J. BUCK, Clerk

DEMURRER

D. W. RHODES,

Plaintiff,

VS.

SNELLGROVE BROTHERS, a Partnership, and J. P. HALL,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW NO. 1933

filed 11-2-53
Alice French
Clerk

STATE OF ALABAMA)
BALDWIN COUNTY) . . . IN THE CIRCUIT COURT . . . LAW SIDE.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons Snellgrove Brothers, a partnership, and J. P. Hall 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 same, then and there to answer the complaint of D. W. Rhodes.

WITNESS my hand this the 4th day of March, 1953.

Clerk

- COMPLAINT -

D. W. RHODES, Plaintiff,	)(	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA LAW SIDE.
-vs- J. P. HALL AND SNELLGROVE BROTHERS, A GENERAL PARTNERSHIP, ~~and~~ COMPOSED ~~J. P. HALL~~, OF ROSCOE SNELLGROVE AND STRICKLIN SNELLGROVE, ~~AND~~ ~~J. P. HALL~~ Defendants.	)(	

COUNT ONE

The Plaintiff claims of the Defendants as damages One Thousand Thirty-one Dollars and forty cents ($1031.40) for that he avers that on to-wit:- April 29, 1952, J. P. Hall, the agent, servant or employee of Snellgrove Brothers, a partnership, while acting within the line or scope of his employment as such agent, servant or employee, negligently ran a 1951 Chevrolet truck upon or against the truck of the Plaintiff on Alabama Highway 89 at its intersection with the Bon Secour Farm to Market Road, approximately one and one-half miles West of the Corporate Limits of the Town of Foley, Baldwin County, Alabama, this being a public highway, and as a proximate result and consequence thereof, Plaintiff's truck was severely damaged in that the frame was bent, the right front fender, door, light, radiator, etc. were bent and broken and the vehicle otherwise severely damaged, all to Plaintiff's damage as aforesaid.

COUNT TWO

The Plaintiff claims of the Defendants as damages One Thousand Thirty-one Dollars and forty cents ($1031.40) for that he avers that on to-wit:- April 29, 1952, J. P. Hall negligently ran a 1951 Chevrolet truck upon or against the truck of the Plaintiff on Alabama Highway 89 at its intersection with the Bon Secour Farm to Market Road, approximately one and one-half miles West of the Corporate Limits of the Town of Foley, Baldwin County, Alabama, this being a public highway, and as the proximate result and consequence thereof, Plaintiff's truck was severely damaged in that the frame was bent, the right front fender, door, light, radiator, etc. were bent and broken and the vehicle otherwise severally damaged, all to the Plaintiff's damage as aforesaid.

Attorney for Plaintiff

Plaintiff demands trial by jury.

Attorney for Plaintiff

FILED
3-4-53
ALICE J. DUCK, Clerk

J. P. Hall is a resident of Brundidge, Alabama, and Snellgrove Brothers, a partnership, is in New Brockton, Alabama

Received in Sheriff's Office
this 4 day of Mar 1953
TAYLOR WILKINS, Sheriff

Executed this the 7th Day March 1953 by serving a copy of the within Summons & complaint on J. P. Hall
Deputy
Lee Reeves, Sheriff
W. H. Duncan D.S.

Executen this 11 day of March
19 53 by leaving a copy of the
within writ with Snellgrove Bros -
W. D. Hellman
Sheriff

by L L Hunter
D.S.

1933 -

SUMMONS AND COMPLAINT

D. W. RHODES,

Plaintiff,

-vs-

SNELLGROVE BROTHERS, a partnership, and J. P. HALL,

Defendants.

()

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE

FILED
3-4-53
ALICE J. BUCK, Clerk

CECIL G. CHASON
ATTORNEY AT LAW
FOLEY, ALABAMA