

STATE OF ALABAMA,     0  
                              0     TO ANY SHERIFF OF THE STATE OF ALABAMA:  
COUNTY OF BALDWIN.   0

You are hereby commanded to summon BEE UNDERWOOD to appear within thirty days from the service of this writ in the Circuit Court of Baldwin County, Alabama, at the place of holding the same, then and there to answer the complaint of AGNES M. PRITCHETT.  
Witness my hand, this the 17th day of Octo**o**bber, 1953.

Reigel - Newcomb  
C L E R K.

\*\*\*\*\*

C O M P L A I N T.

AGNES M. PRITCHETT,	0	
	0	
Plaintiff,	0	IN THE CIRCUIT COURT OF
	0	
VS.	0	BALDWIN COUNTY, ALABAMA.
	0	
BEE UNDERWOOD,	0	AT LAW.
	0	
Defendant.	0	NO. <u>2103</u>

C O U N T   O N E.

The Plaintiff claims of the defendant the sum of FIVE THOUSAND (\$5,000.00) DOLLARS as damages for an assault and battery committed by the defendant on the plaintiff on, to-wit: the 29th day of September, 1953. And the plaintiff avers that said defendant did on said date unlawfully beat and cruelly treat the plaintiff with a gun, while she was in her own home; and the defendant did bruise, wound, cut and injure plaintiff and as a proximate consequence thereof, she was made sick and sore and suffered lacerations to her head and body, her face was bruised and cut, her arms and hands and fingers were cut and bruised and sprained; she suffered physical and mental pain and anguish, indignities, insults, humiliation, fright and injuries to her feelings and was compelled to lose time from her work and to incur physician's and hospital bills, all to her damage as aforesaid. Hence this suit.

C O U N T   T W O .

The Plaintiff claims of the Defendant FIVE THOUSAND (\$5,000.00) DOLLARS damages for an assault and battery committed by the defendant on the plaintiff on, to-wit: the 29th day of September, 1953.

J. Blair A. Mashburn Jr.  
ATTORNEY FOR PLAINTIFF.

Plaintiff respectfully requests that this case be tried by a jury.

J. Blair A. Mashburn Jr.  
ATTORNEY FOR PLAINTIFF.

Received \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_  
and on 10 day of Oct 1953

I served a copy of the within  
on Bee Underwood

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By L. L. Stauder

**RECORDED**  
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

\*\*\*\*\*

AGNES M. PRITCHETT,  
  
Plaintiff,

Vs.

BEE UNDERWOOD,  
  
Defendant.

\*\*\*\*\*

SUMMONS AND COMPLAINT.

Filed 10-7-53  
Angela M. Smith

TELFAIR J. MASHBURN, JR.  
ATTORNEY-AT-LAW  
BAY MINETTE, ALABAMA

Defendants Address: Foley, Ala.

AGNES M. PRITCHETT,	I	
Plaintiff,	I	IN THE CIRCUIT COURT OF
vs.	I	BALDWIN COUNTY, ALABAMA
BEE UNDERWOOD,	I	AT LAW NO. 2103
Defendant.	I	

PLEA

Comes the Defendant in the above styled cause and for plea to the Complaint filed in said cause and each and every count thereof separately and severally, says:

1. Not guilty.
2. For further plea to said Complaint by way of recoupment the Defendant claims of the Plaintiff the sum of Five Thousand Dollars (\$5,000.00) as damages for an assault and battery committed by the Plaintiff on the Defendant on to-wit, the 29th day of September, 1953. And the Defendant avers that said Plaintiff did on the said date beat the Defendant on his head with a weapon, the nature of which is unknown to the Defendant, thereby causing a large lump on his head and cutting his head in such a manner that it required five (5) stitches to close the wound and as a proximate consequence thereof he was made sick and sore and was caused to suffer great mental and physical anguish and to lose time from his work and to incur physician and hospital bills all to his damage in the sum afore mentioned.
3. For further plea to said Complaint by way of recoupment the Defendant claims of the Plaintiff the sum of Five Thousand Dollars (\$5,000.00) as damages for an assault and battery committed by the Plaintiff on the Defendant on to-wit, the 29th day of September, 1953. And the Defendant avers that he went to a house in Foley, Alabama on said date which was owned by him in which the Plaintiff was then living and that the Plaintiff invited him in and after being in such home a few minutes when he started to leave he heard a noise behind him and he looked around and as he looked around

the Plaintiff struck him on his forehead with some kind of weapon, the nature of which is unknown to the Defendant, which blow caused a large lump on his forehead and cut his forehead so that it required five (5) stitches to close the wound and almost caused him to lose consciousness and as a proximate consequence thereof he was made sick and sore and suffered a serious laceration of his forehead and he was caused to suffer great mental and physical pain and anguish and was caused to lose much time from his work and was caused to incur physician and hospital bills all to his damage in the sum afore mentioned.

  
Attorneys for Defendant.

**RECORDED**

PLEA

AGNES M. PRITCHETT,  
Plaintiff,

vs.

BEE UNDERWOOD,  
Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW NO. 2103

Filed this \_\_\_\_ day of November,  
1953.

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Clerk

**FILED**

NOV 4 1953

ALICE J. DUCK, CLERK

LAW OFFICES

**CHASON & STONE**

BAY MINETTE, ALABAMA

*Copy mailed to  
J. H. Mashburn Jr.*

AGNES M. PRITCHETT,

Plaintiff,

vs.

BEE UNDERWOOD,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 2103

MOTION TO STRIKE

Now comes the plaintiff in the above styled cause and moves to strike Paragraphs 2 and 3 of the plea heretofore filed by the defendant and as grounds for said motion assigns the following:

1. The said Paragraphs 2 and 3 are no defense to the Complaint.
2. The said Paragraphs 2 and 3 are sounding in damages merely.
3. The said Paragraphs 2 and 3 are sounding in damages merely and cannot be set-off against the damages claimed by the plaintiff because of Sections 350 and 351 of Title 7 of the 1940 Code of Alabama.

Julian A. Marshall  
Attorney for plaintiff.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.  
IN EQUITY. NO. 2103

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AGNES M. PRITCHETT,  
Plaintiff,  
VS.

BEE UNDERWOOD,  
Defendant.

\*\*\*\*\*

MOTION TO STRIKE.

FILED  
FEB 3 1954  
ALICE A. DICK, Clerk



TELFAIR J. MASHBURN, JR.

ATTORNEY AT LAW  
DAHLBERG BUILDING  
PHONE: 4661

STATE OF ALABAMA, 0  
COUNTY OF BALDWIN. 0

BAY MINETTE, ALA.  
TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon BEE UNDERWOOD to appear within thirty days from the service of this writ in the Circuit Court of Baldwin County, Alabama, at the place of holding the same, then and there to answer the complaint of AGNES M. PRITCHETT.

Witness my hand, this the \_\_\_\_ day of October, 1953.

\_\_\_\_\_  
C L E R K.

\*\*\*\*\*

C O M P L A I N T.

AGNES M. PRITCHETT,  
Plaintiff,  
VS.  
BEE UNDERWOOD,  
Defendant.

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0  
0  
0

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.  
AT LAW.  
NO. \_\_\_\_\_

C O U N T O N E.

The Plaintiff claims of the defendant the sum of FIVE THOUSAND (\$5,000.00) DOLLARS as damages for an assault and battery committed by the defendant on the plaintiff on, to-wit: the 29th day of September, 1953. And the plaintiff avers that said defendant did on said date unlawfully beat and cruelly treat the plaintiff with a gun, while she was in her own home; and the defendant did bruise, wound, cut and injure plaintiff and as a proximate consequence thereof, she was made sick and sore and suffered lacerations to her head and body, her face was bruised and cut, her arms and hands and fingers were cut and bruised and sprained; she suffered physical and mental pain and anguish, indignities, insults, humiliation, fright and injuries to her feelings and was compelled to lose time from her work and to incur physician's and hospital bills, all to her damage as aforesaid. Hence this suit.

ATTORNEY AT LAW  
DAHLBERG BUILDING  
PHONE: 4661

BAY MINETTE, ALA.  
C O U N T Y T W O.

The Plaintiff claims of the Defendant FIVE THOUSAND (\$5,000.00) DOLLARS damages for an assault and battery committed by the defendant on the plaintiff on, to-wit: the 29th day of September, 1953.

Julius H. Malheur  
ATTORNEY FOR PLAINTIFF.

Plaintiff respectfully requests that this case be tried by a jury.

Isaac H. Madsen, Jr.  
ATTORNEY FOR PLAINTIFF.

17-10-1932  
Handwritten signature  
17-10-1932

20

1. 100%  
 2. 90%  
 3. 80%  
 4. 70%  
 5. 60%  
 6. 50%  
 7. 40%  
 8. 30%  
 9. 20%  
 10. 10%

[illegible]

1955





AT LAW. NO. 2103

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

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AGNES M. PRITCHETT,  
Plaintiff,

Vs.

BEE UNDERWOOD,  
Defendant.

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SUMMONS AND COMPLAINT.

*Filed 10-7-23*  
*Agnes Pritchett*  
*Clk*

Defendants Address: Foley, Al.

ALABAMA FOR CRIMINALS

*Agnes Pritchett vs. Bee Underwood*

1923

ALABAMA FOR CRIMINALS

ALABAMA FOR CRIMINALS

*Agnes Pritchett vs. Bee Underwood*

on the 10th day of September, 1923.  
DORIS GIBSON for her servant and partner committed by the defendant  
the 10th day of September, 1923. (00.000.00) (02.000.00)

ALABAMA FOR CRIMINALS

PHONE: 2001  
DORIS GIBSON  
ALABAMA FOR CRIMINALS

ALABAMA FOR CRIMINALS