

ERNEST M. BAILEY

ATTORNEY AT LAW

221 FAIRHOPE AVE.

TELEPHONE WAVERLY 8-9759

FAIRHOPE, ALABAMA

3003

August
10th
1956

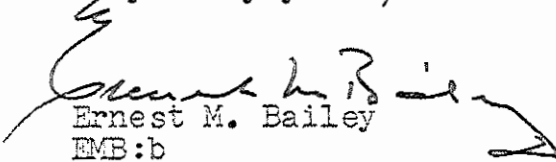
Clerk of the Circuit Court
Baldwin County, Alabama
Bay Minette, Alabama

Dear Mrs. Duck:

Will you please file the enclosed Bills of Complaint and have proper service made on the same.

Thanking you in advance, I am

Very truly yours,

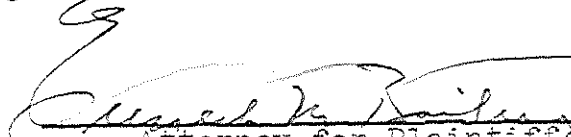

Ernest M. Bailey

EMB:b

Enclosures

✓ Mr. Edward A. Roberts can be served at: Southern Industries Corp.
61 St. Joseph Street
Mobile, Alabama

and body; they were made sick, sore and lame; they received multiple lacerations, contusions and abrasions about their face and body; they were caused to expend considerable sums of money for medical treatment, hospital care, and medicines in and about the treatment of their injuries; their clothing and personal effects were damaged and injured, for all of which they claim damages as aforesaid.


Attorney for Plaintiffs

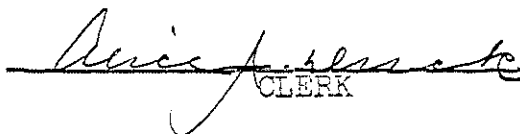
STATE OF ALABAMA I

BALDWIN COUNTY I

TO ANY SHERIFF OF THE STATE OF ALABAMA :

You are hereby commanded to summon EDWARD A. ROBERTS, individually, and d/b/a B-R RANCH, 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 NANCY SUMRALL, a minor, and MAUDIE JOE SUMRALL, a minor, ~~suing by their~~ mother and next friend, MRS. VIRGINIA SUMRALL.

Witness my hand, this the 13 day of August, 1956.


CLERK

NANCY SUMRALL, a minor, and I
MAUDIE JOE SUMRALL, a minor, I
suing by their mother and next I
friend, MRS. VIRGINIA SUMRALL, I

Plaintiffs I

-vs-

EDWARD A. ROBERTS, individually, I
and d/b/a The B-R RANCH, I

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

C O U N T O N E

— The Plaintiff, Nancy Sumrall, a minor, six years of age, and Maudie Joe Sumrall, a minor, seven years of age, who sue by their mother, and next friend, Mrs. Virginia Sumrall, claim of the Defendant the sum of Eight Thousand Dollars (\$8,000.00) as damages, for that heretofore, on to-wit, May 17, 1956, near the City of Fairhope, County of Baldwin, State of Alabama, the Plaintiffs were riding in an automobile along or upon a public street or highway, to-wit, commonly referred to as the Grand Hotel Farm Road, a public road or State of Alabama road running between U. S. Highway 98 and Greeno Road near Fairhope, Alabama, and then and there the agent, servant or employee of the Defendant, while acting within the line and scope of his employment, negligently allowed a water sprinkler to throw water in and on the said road so as to cause the road to become wet and slippery, and as a proximate consequence thereof, the Plaintiffs received severe personal injuries in this, to-wit, they were bruised and lacerated about the legs, face

66 3663 RECORDED 235

EXECUTED

This 17th day of Aug, 1956

by serving a copy of this within on

E. A. Roberts

RAY D. BRIDGES, Sheriff

By L. Nelson D. S.

SUMMONS AND BILL OF COMPLAINT

NANCY SUMRALL, a minor, and
MAUDIE JOE SUMRALL, a minor,
Suing by their mother and next
friend, Mrs. Virginia Sumrall

Plaintiffs

vs.

EDWARD A. ROBERTS, individually,
and d/b/a The B-R RANCH,

Defendant

The Sheriff claims 1
miles at 10¢ per mile for
a total of \$ 10
Ray Bridges, Sheriff
Mobile County, Alabama

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
Mr. E. A. Roberts can be served at
Southern Industries Corp.
61 St. Joseph St. Mobile, Alabama

FILED
ERNEST M. BAILEY
ATTORNEY AT LAW
FAIRMONT, ALABAMA
AUG 12 1956