

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 The 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 VIRGINIA SUMRALL.

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

Reice J. Hester
CLERK

VIRGINIA SUMRALL,	I	IN THE CIRCUIT COURT OF
Plaintiff	I	BALDWIN COUNTY, ALABAMA
vs.	I	AT LAW
EDWARD A. ROBERTS,	I	
individually, and	I	
d/b/a The B-R RANCH,	I	
Defendant		

C O U N T O N E

The Plaintiff claims of the Defendant Seven Thousand Dollars (\$7,000.00) as damages, for that heretofore, on to-wit, May 17, 1956 the Plaintiff was lawfully operating an automobile along a public road, or highway, near the City of Fairhope, County of Baldwin, State of Alabama, to-wit, commonly referred to as the Grand Hotel Farm Road, and the State of Alabama Public road running between U. S. Highway 98 and Greeno Road in Baldwin County, Alabama, and that then and there the Defendant's servant, agent or employee, 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, Plaintiff's automobile did become damaged and demolished, or greatly damaged or rendered less valuable, and the Plaintiff received severe personal injuries in this, to-wit, she was bruised and lacerated about the leg, face and body; she was made sick, sore and lame; she received multiple

lacerations, contusions and abrasions about her face and body; she was caused to expend considerable sums for medical treatment, hospital care, and medicines in and about the treatment of her injuries; her clothing and personal effects were damaged and injured, for all of which she claims damages as aforesaid.

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James M. Bailey
Attorney for Plaintiff

2566 3004 235

SUMMONS AND BILL OF COMPLAINT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

VIRGINIA SUMRALL,
Plaintiff

vs.

EDWARD A. ROBERTS, Individually
and d/b/a THE B-R RANCH,
Defendant

Mr. E. A. Roberts can be served:

Southern Industries Corp.
61 St. Joseph Street
Mobile, Alabama

FILED
AUG 13 1956
AUG 1 1956, CIVIL

ERNEST M. BAILEY
ATTORNEY AT LAW
FAIRHOPE, ALABAMA

DEPOT IN EXECUTED

This 17th day of Aug. 1956
by serving a copy of the within on
E. A. Roberts
RAY D. BRIDGES, Sheriff
By L. Nelson D.S.

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