

THE STATE OF ALABAMA,
Baldwin County.

No. 9619

CIRCUIT COURT

Term, 1935

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded, That of the goods and chattels, lands and tenements of
W. S. Lewis Plaintiff in the suit,
 you cause to be made the sum of _____ Dollars,

costs of suit, created by said Plaintiff _____, for that, whereas, on the _____ day of Sept _____ 1935, the said Plaintiff _____ recovered by the Judgment of the said Circuit Court of said County against _____

Henry C. Reed Defendant
to the suit, the sum of Dismissed by Plaintiff Dollars,
besides Dollars, cost of suit;

upon which Judgment an Execution has been issued and returned by the Sheriff, "No Property Found."

AND HAVE YOU THAT MONEY ready to render to Robert S. Smith

Clerk of said Court, and make return of this Writ and the execution thereof, according to law.

Witness my hand, this 11 day of Sept 1933
Robert F. Buck Clerk

[illegible]

W. S. IRWIN,

Plaintiff,

VS.

HENRY E. REID,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW. NO. ____.

INTERROGATORIES TO BE PROPOUNDED TO THE DEFEND-
ANT UNDER SECTION 7764 OF THE 1923 CODE OF ALABAMA.

No. 1. Please give your full and correct name and address.

No. 2. Please state in what business you were engaged on March 24, 1932.

No. 3. On March 24, 1932, were you in business for yourself or were you acting as agent, servant or employee of some person, firm or corporation?

No. 4. If on March 24, 1932, you were acting as agent, servant or employee of some person, firm or corporation, give the name and address of the person, firm or corporation and if you were employed by a partnership, give the name of the company and the names of the partners composing it, and if you were employed by a corporation state where it is incorporated.

No. 5. If you were acting as agent, servant or employee of a person, firm or corporation on March 24, 1932, describe fully your duties to such person, firm or corporation.

No. 6. If you were employed by a person, firm or corporation on March 24, 1932, was the trip which you were making from Stapleton toward Bay Minette in Baldwin County, Alabama, within the line and scope of your employment and made in connection with the business of your employer?

No. 7. Did you or the person, firm or corporation which employed you have public liability and property damage insurance or either on the automobile which you were driving between Stapleton and Bay Minette in Baldwin County, Alabama, on March 24, 1932, and if you or your employee have such insurance, was it in force on the said date?

No. 8. Give the name and address of the company which carried the insurance referred to in question No. 7, and also the amount of the policy.


Attorney for Plaintiff.

STATE OF ALABAMA

BALDWIN COUNTY

Before me, T. W. Richerson, Clerk of the Circuit Court of said County in said State, personally appeared J. B. Blackburn, who, after being by me first duly sworn, deposes and says: That he is the attorney for the Plaintiff in the above entitled cause and that the answers to the foregoing interrogatories, if well and truly made, will be material testimony for the Plaintiff in the said cause.

J. B. Blackburn

Sworn to and subscribed before me on
this the 28th day of March, 1932.

T. W. Richerson

Clerk of the Circuit Court, Baldwin
County, Alabama.

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA.

You are hereby commanded to summon Henry E. Reid 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 W. S. Irwin.

Witness my hand this the 24th day of March, 1932.



Clerk of the Circuit Court,
Baldwin County, Alabama.

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W. S. IRWIN,

Plaintiff,

VS.

HENRY E. REID,

Defendant.

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

(1) The plaintiff claims of the defendant the sum of Two Thousand Dollars (\$2,000.00), for that, on, to-wit, March 24th, 1932, the defendant negligently drove an automobile into plaintiff's automobile at a point on the public highway leading from Bay Minette to Stapleton in Baldwin County, Alabama, one hundred fifty yards north of what is known as Long's Filling Station, and as a proximate result of said negligence on the part of the defendant, the plaintiff's automobile was wrecked, the front axle bent, the left hand front and rear fenders and running board bent and the frame hood and body bent and damaged; the plaintiff was bruised and caused to suffer great mental anguish, all to plaintiff's damage as aforesaid.

(2) The Plaintiff claims of the defendant the further sum of Two Thousand Dollars (\$2,000.00) damages, for that, on, to-wit, the 24th day of March, 1932, plaintiff was driving his automobile along the public highway leading from Bay Minette to Stapleton in Baldwin County, Alabama, at a point about one hundred and fifty yards north of what is known as Long's Filling Station, and the plaintiff avers that the defendant wilfully and maliciously injured plaintiff and greatly damaged his automobile by causing the automobile in which defendant was driving to run into or against the plaintiff's automobile and as the proximate result of said wilfulness and maliciousness, plaintiff was bruised and caused to suffer great physical pain and mental

Page Two.

anguish and to incur great expense in repairing his automobile,
all to plaintiff's damage as aforesaid.

Plaintiff demands a trial
of said cause by jury.

J. B. B. Lockman
Attorney for Plaintiff.

J. B. B. Lockman
Attorney for Plaintiff.