STATE OF ALABAMA,
BALDWIN COUNTY.

IN THE CIRCUIT COURT-LAW SIDE.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Geo. A. Hormel & Co., a Corporation, and Charles Parker, 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 A. J. Mitchell.

Witness my hand this 26 day of March, 1932.

D. W. Richmon
Clerk.

COMPLAINT.

A. J. MITCHELL,
Plaintiff,
-vs-
GEO. A. HORMEL & CO., a Corporation, and CHARLES PARKER,
Defendants.

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

COUNT 1: The Plaintiff claims of the Defendants the sum of Five Thousand Dollars ($5000.00), in this:- That while he, the Plaintiff, was operating his automobile along the Mobile and Pensacola Highway, at a point in Baldwin County, Alabama about two and a half miles west of the Florida and Alabama line on, to-wit, March 4th, 1932, as he had a right to do, the Defendant's truck, which was then and there being operated by the Defendant through his Agent, and while said Agent was acting within the line and scope of his duties as such, said Agent being Charles Parker, ran Defendant's truck into and against the Plaintiff's automobile in such a negligent manner that as a proximate consequence thereof Plaintiff was precipitated from his said automobile, causing four of his ribs to be broken, his collar bone broken and three of his ribs fractured; that Plaintiff was made sick and sore and suffered grievous bodily injury, all of which caused him to seek and obtain hospital and medical assistance to his great damage, in the sum aforementioned.

COUNT 2: The Plaintiff claims of the Defendant the sum of Five Hundred Dollars ($500.00), in this:- That while he, the Plaintiff, was operating his automobile along a public highway in Baldwin County, Alabama, on the Pensacola and Mobile Road, at a point about two and a half miles west of the Florida line on, to-wit, the 4th day of March, 1932, as he had a right to do, the Defendant's truck, which was then and there being operated by the Defendant through his Agent or servant, and while said agent or servant was acting within the line and scope of his duty or authority as such, said Agent being Charles Parker, ran Defendant's truck into and against Plaintiff's automobile in such a negligent manner that as a proximate consequence thereof Plaintiff's automobile was badly damaged in the sum aforementioned.

Hybart, Heard & Shason
Attorneys for Plaintiff.

The Plaintiff demands a trial by Jury.

Hybart, Heard & Shason
Attorneys for Plaintiff.

A. J. MITCHELL, PLAINTIFF,	)	
	)	IN THE CIRCUIT COURT OF
VS.	)	BALDWIN COUNTY, ALABAMA.
GEORGE A. HORMEL AND COMPANY, A CORPORATION, AND CHARLES PARKER, DEFENDANTS.	)	

Come the defendants and, each for itself or himself, demur to the plaintiff's complaint and to count one and two thereof separately and severally, and assign the following grounds of demurrer:

1. Said count fails to state a cause of action.

2. Said count is vague and uncertain in its allegations.

3. Said count fails to charge the defendant with negligence.

4. No facts are set forth which would impose liability upon the defendants.

5. It is not alleged that there was a causal connection between the acts of the defendants and the damages to the plaintiff.

Attorney for Defendants.

RECORDED

Filed for 22/232
T W Reilly
Recorder

STATE OF ALABAMA,
BALDWIN COUNTY.

IN THE CIRCUIT COURT-LAW SIDE.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Geo. A. Hormel & Co., a Corporation, and Charles Parker, 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 A. J. Mitchell.

Witness my hand this 26 day of March, 1932.

D. M. Rimmer
Clerk.

COMPLAINT.

A. J. MITCHELL, Plaintiff, -vs- GEO. A. HORMEL & CO., a Corporation, and CHARLES PARKER, Defendants.	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA. LAW SIDE.

COUNT 1: The Plaintiff claims of the Defendants the sum of Five Thousand Dollars ($5000.00), in this:- That while he, the Plaintiff, was operating his automobile along the Mobile and Pensacola Highway, at a point in Baldwin County, Alabama about two and a half miles west of the Florida and Alabama line on, to-wit, March 4th, 1932, as he had a right to do, the Defendant's truck, which was then and there being operated by the Defendant through his Agent, and while said Agent was acting within the line and scope of his duties as such, said Agent being Charles Parker, ran Defendant's truck into and against the Plaintiff's automobile in such a negligent manner that as a proximate consequence thereof Plaintiff was precipitated from his said automobile, causing four of his ribs to be broken, his collar bone broken and three of his ribs fractured; that Plaintiff was made sick and sore and suffered grievous bodily injury, all of which caused him to seek and obtain hospital and medical assistance to his great damage, in the sum aforementioned.

COUNT 2: The Plaintiff claims of the Defendant the sum of Five Hundred Dollars ($500.00), in this:- That while he, the Plaintiff, was operating his automobile along a public highway in Baldwin County, Alabama, on the Pensacola and Mobile Road, at a point about two and a half miles west of the Florida line on, to-wit, the 4th day of March, 1932, as he had a right to do, the Defendant's truck, which was then and there being operated by the Defendant through his Agent or servant, and while said agent or servant was acting within the line and scope of his duty or authority as such, said Agent being Charles Parker, ran Defendant's truck into and against Plaintiff's automobile in such a negligent manner that as a proximate consequence thereof Plaintiff's automobile was badly damaged in the sum aforementioned.

Hybart, Heard & Shuman
Attorneys for Plaintiff.

The Plaintiff demands a trial by Jury.

Hybart, Heard & Shuman
Attorneys for Plaintiff.

Serve on Thomas Paulk
N.P. Mattison Merrill
Attorney Chickasaw

IN THE CIRCUIT COURT OF MOBILE COUNTY, ALABAMA.

Plaintiff,

vs.

Defendants.

-CO-

COMPLAINT.

COUNT 1: The Plaintiff claims of the Defendant the sum of Five Hundred Dollars ($500.00), in this:- That while he, the Plaintiff, was operating his automobile along a public highway in Baldwin County, Alabama, on the Pensacola and Mobile Road, at a point about two and a half miles west of the Mobile line on, to-wit, the 14th day of March, 1928, he ran a tract of land, owned by Defendant's truck, which was then and there being operated by the Defendant through his agent or servant and while said agent or servant was acting within the line and scope of his duty or authority as said Agent, Charles Parker, the Defendant's truck ran and against Plaintiff's automobile in such a negligent manner that as a proximate consequence thereof Plaintiff's automobile was totally damaged in the amount aforementioned.

The Plaintiff demands a trial by jury.

Attorneys for Plaintiff.

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COUNT 2: The Plaintiff claims of the Defendant the sum of Five Hundred Dollars ($500.00), in this:- That while he, the Plaintiff, was operating his automobile along a public highway in Baldwin County, Alabama, on the Pensacola and Mobile Road, at a point about two and a half miles west of the Mobile line on, to-wit, the 14th day of March, 1928, he ran a tract of land, owned by Defendant's truck, which was then and there being operated by the Defendant through his agent or servant and while said agent or servant was acting within the line and scope of his duty or authority as said Agent, Charles Parker, the Defendant's truck ran and against Plaintiff's automobile in such a negligent manner that as a proximate consequence thereof Plaintiff's automobile was totally damaged in the amount aforementioned.

The Plaintiff demands a trial by jury.

Attorneys for Plaintiff.