

W.E. BRYANT,
PLAINTIFF

VS

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA.

LOUISVILLE & NASHVILLE
RAILROAD COMPANY,
DEFENDANT.

ONE: Plaintiff claims of the defendant the sum of THIRTY FIVE DOLLARS as damages for that on or about July 27th, 1917, defendant killed one cow, the property of Plaintiff, at or near Carney Station, Baldwin County, Alabama, through and by reason of negligence or want of skill on the part of defendant's agent in the management and running of its locomotive, cars or train, wherefore plaintiff sues.

TWO: Plaintiff claims of the defendant the ^{further} sum of THIRTY FIVE DOLLARS as damages for that on or about July 27th, 1917, defendant killed one cow, the property of Plaintiff, at or near Carney Station, Baldwin County, Alabama, through and by reason of negligence or want of skill on the part of defendant's agent in the management and running of its locomotive, cars or train, wherefore plaintiff sues.

THREE: Plaintiff claims of the defendant the ^{further} sum of ~~THIRTY FIVE~~ FIVE DOLLARS as damages for that on or about July 27th, 1917, defendant killed one cow, the property of Plaintiff, at or near Carney Station, Baldwin County, Alabama, through and by reason of negligence or want of skill on the part of defendant's agent in the management and running of its locomotive, cars or train, wherefore plaintiff sues.

FOUR: Plaintiff claims of the defendant the further sum of ONE HUNDRED FIVE DOLLARS damages for that

whereas, on or about the 27th day of July, 1917, defendant killed three head of cows at, or near, Carney Station, Baldwin County, Alabama, the property of the plaintiff, through or by reason or negligence or want of skill on the part of defendant's agent in the management, handling and running of its locomotive, cars or train, wherefore plaintiff sues.

Richard Augustus Beebe
Attorneys for Plaintiff.

W. C. Bryant
vs
L. & N. RR.

Complaint

Filed this July
26, 1918
J. C. Richmond
Clerk

The State of Alabama
Baldwin County

No.

Circuit Court

..... Fall Term, 1918.

To Any Sheriff of the State of Alabama:

You are hereby commanded to summon..... Louisville and Nashville Railroad
Company.

to appear and plead, answer or demur, within thirty days from the service hereof, to the Complaint filed in the Cir-
cuit Court of Baldwin County, State of Alabama, at Bay Minette, against..... it

..... the Defendant..... by..... W.E. Bryant,
..... Plaintiff

Witness my hand this..... 29th..... day of..... August..... 1918

T. W. Richardson Clerk.

Complaint

..... Plaintiff Versus

The plaintiff claims of the defendant

..... Dollars due by

Plaintiff's Attorney
by.

No.

State of Alabama
Baldwin County

CIRCUIT COURT

W. E. Bryant.

vs.

Plaintiffs

Louisville & Nashville

Railroad Company

Defendants

Summons and Complaint

Filed..... 191.....

7/26

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D. W. Richardson

Clerk.

Defendant lives at

Rickorby Austill & Beebe

Plaintiff's Attorney

Defendant's Attorney

Times Print—Bay Minette.

Received in office

August 29th 1918

O. E. Eubanks Sheriff

I have executed this Writ
this 30th day Sept 1918

by leaving a copy of the within summons and complaint with

J. E. Cooley Agent
Louisville & Nashville
Railroad Company

O. E. Eubanks Sheriff.

D. W. Richardson Deputy Sheriff.

Swift & Company, Ltd.)
a corporation)

In Circuit Court of Baldwin County, Alab

VS

A. Seitz, Defendant,)
State Bank of Foley,)
Garnishee.)

Now comes the State Bank of Foley, garnishee in the above stated cause, and for answer to the writ of garnishment served it on the 14 day of October 1918, upon oath says that the State Bank of Foley was not indebted to the defendant at the time of the service of the garnishment in the above stated cause or at the time of making its answer hereto, or at any time intervening the time of serving the garnishment and the time of making its answer, and that it will not be indebted in future to said defendant by a contract then existing or at the time of making this answer, and that it will not be liable to said defendant for the delivery of personal property, or for the payment of money, which may be discharged by the delivery of personal property; and that it has not in its possession or under its control money or effects belonging to said defendant.

This answer is made by John C. Lehr, the cashier of said Bank and its duly authorized agent to make such answer and that he has personal knowledge of the facts above stated.

And garnishee having fully answered prays to be discharged with its reasonable costs in this behalf expended.

Subscribed and sworn to before me)
this 31st day of October 1918.)

John C. Lehr
Cashier.

J. H. Gentry
Notary Public, Baldwin County, Ala.

Am S. Auduson
Atty for Garnishee

vs.

State Bank of Foley,
Garnishee.

ANSWER OF GARNISHEE.

Filed in Court,

Act 31, — 1918
J W Richmond
Clerk

State of Alabama,
Baldwin County.

Circuit Court Baldwin County, Alabama.

To any Sheriff of the State of Alabama, Greeting:

Whereas on the 4 day of Dec 1914 in the Circuit Court of Baldwin County, Swift and Company, Ltd a corporation, recovered a judgment against A. Seitz, defendant for the sum of Eight 37/100 dollars and damages and 5 79/100 dollars costs.; and whereas Benjamin McMillan, Jr, attorney for Plaintiff has made affidavit as required by law.

Therefore therefore to command you, that you summon the State Bank of Foley, to appear before the Circuit Court of Baldwin County, Alabama, within thirty days from the service of this process, then, and there to answer, on oath, whether at the time of the service of the garnishment, or at the time of making its answer, or at any time intervening the time of serving the garnishment and making the answer it was indebted to the defendant and whether it will not be indebted in future to said defendant and by a contract then existing and whether by a contract then existing it will be liable to said defendant and for the delivery of personal property, or for the payment of money which may be discharged by the delivery of personal property; of which is payable in personal property, and whether it have not in its possession or under its control, money or effects belonging to the defendant.

Witness my hand this 30th, day of September 1918.

T. W. McMillan
Clerk Circuit Court Baldwin County, Ala.