

JOHN V. DUCK  
ATTORNEY AT LAW  
FAIRHOPE, ALABAMA  
Nov. 3, 1962

Mrs. Alice J. Duck  
Clerk of Circuit Court  
P. O. Box 239  
Bay Minette, Ala.

5205

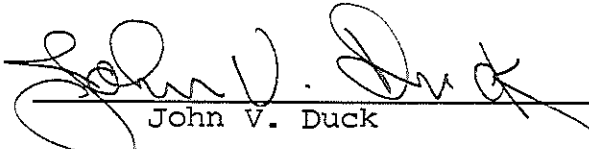
RE: EDWARD BROWN  
-VS-  
CLAUDE L. CRABTREE and  
GLORIA C. CRABTREE, Jointly  
and Individually.

Dear Mrs. Alice:

Service may be had on the above at the Albright  
and Wood Drug Store at St. Joseph & St. Francis Street,  
Mobile, Alabama.

This is for Gloria only. She works until 4 P.M.

Sincerely,

  
John V. Duck

JVD; oq

EDWARD H. BROWN,	)	IN THE CIRCUIT COURT OF
Plaintiff	)	BALDWIN COUNTY, ALABAMA
-VS-	)	AT LAW
CLAUDE L. CRABTREE, and	)	
GLORIA C. CRABTREE, Jointly	)	
and Individually,	)	
Defendants	)	

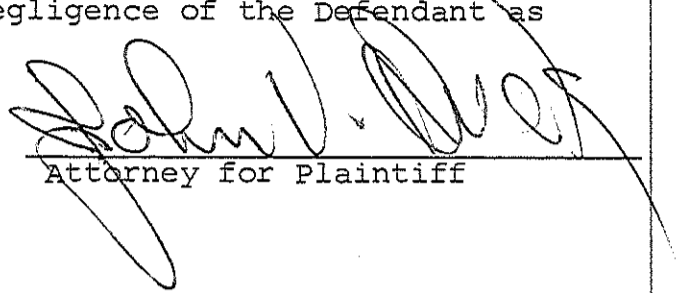
COUNT ONE

Plaintiff claims of the Defendant the sum of FIVE THOUSAND (\$5,000.00) DOLLARS for damages for that, on to-wit, the 25th day of May, 1962, the Defendant, CLAUDE L. CRABTREE, acting by and through his agent, servant, or employee, GLORIA C. CRABTREE, who was then and there acting within the line and scope of her authority as such agent, servant or employee, so negligently drove a motor vehicle on U. S. 90 at a point on the East End of the Tensaw River Bridge, then and there being a public highway in Baldwin County, Alabama, as to cause or allow such motor vehicle to run into the motor vehicle of the plaintiff and as a proximate result of the negligence of such defendants, the said plaintiff received injuries in that he was injured by separation of his ribs and he was otherwise bruised, suffered lacerations, abraisions and contusions, and was otherwise made sick, lame and soar, and was caused to expend great sums of money in and about the care and treatment of the said injuries, and that his said automobile was then and there greatly damaged and was rendered a total loss, all as a direct and proximate result of the negligence of the defendants as aforesaid.

COUNT TWO

Plaintiff claims of the Defendant, GLORIA C. CRABTREE, the sum of FIVE THOUSAND (\$5,000.00) DOLLARS for that heretofore and on to-wit, the 25th day of May, 1962, the Defendant, GLORIA C. CRABTREE so willfully and wantonly operated an automobile on U.S. 90 at a point on the East end of the Tensaw River Bridge, then and there being a Public highway in Baldwin County, Alabama, as to cause or allow such motor vehicle to run into the motor vehicle of the plaintiff and as a proximate result of the willful and wanton negligence of the Defendant as aforesaid, the Plaintiff was willfully and wantonly injured in that he was injured by a separation of his ribs, and he was otherwise bruised, suffered lacerations, abraisions and contusions and was caused to expend great sums of

money in and about the care and treatment of the said injuries,  
and that his said automobile was then and there greatly damaged  
and was rendered a total loss, all as a direct and proximate re-  
sult of the willful and wanton negligence of the Defendant as  
aforesaid, hence this suit.

  
Attorney for Plaintiff

FILED

JUL 17 1932

ALICE J. DUCK, CLERK  
REGISTER

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. \_\_\_\_\_

\_\_\_\_\_ TERM, 19\_\_\_\_\_

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon CLAUDE L. CRABTREE, and GLORIA C. CRABTREE,  
JOINTLY AND INDIVIDUALLY

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the  
Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against CLAUDE L. CRABTREE  
AND GLORIA C. CRABTREE, Defendant

by EDWARD H. BROWN, Plaintiff

Witness my hand this 17 day of July 1962

Exp. - 7-31-62

Alice J. Duck, Clerk

*Edna J. Duck*  
No. *5-205* Page *3739*

THE STATE OF ALABAMA  
BALDWIN COUNTY

CIRCUIT COURT

EDWARD H. BROWN

Plaintiffs

vs.

*3/4*  
CLAUDE L. CRABTREE and  
*1/14*  
GLORIA C. CRABTREE, Jointly  
Defendants  
and individually

SUMMONS and COMPLAINT

Filed **FILED** 19

JUL 17 1962

Clerk

ALICE J. DUCK, CLERK REGISTER

*Gloria C Crabtree  
Aubright & Woodburg  
St. Joseph & St. Francis St  
Mobile, Ala*

John V. Duck

Plaintiff's Attorney

RECEIVED

Defendant's Attorney

JUL 18 1962

SHERIFF'S OFFICE

Gloria C. Crabtree may be served at: #4, 14 Mill St. Crichton Station Mobile, Ala. Defendant lives at or: Route 3, Box 475G Harwell Rd Mobile, Alabama

RECEIVED IN OFFICE 605  
Claude L. Crabtree: Farrell St.  
Mobile, Alabama

19

Sheriff

I have executed this summons

this *July 31*, 19 *62*

by leaving a copy with

*Claude L Crabtree*  
*Gloria C Crabtree*

RETURNED

*10-14-62*  
*Gloria C Crabtree*  
Not found in my County after diligent search and inquiry

RAY D. BRIDGES, Sheriff

By *W. J. F. ...* S.

RECEIVED

NOV 8 1962

SHERIFF'S OFFICE

*Ralph Bridges* Sheriff

*L. B. Smith* Deputy Sheriff

*W. J. F. ...*

EDWARD H. BROWN

Plaintiff,

VS.

CLAUDE L. CRABTREE and  
GLORIA C. CRABTREE,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

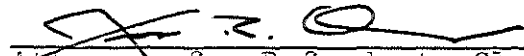
AT LAW

NO. 5205

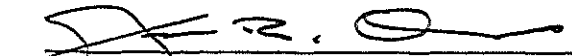
DEMURRER

Now comes the Defendant, CLAUDE L. CRABTREE, and demurs to the complaint heretofore filed in said cause and to each count thereof and as grounds for said demurrer assign the following seperately and severally:

1. It does not state a cause of action.

  
Attorney for Defendant, Claude L.  
Crabtree

The Defendant, Claude L. Crabtree, demands a trial by jury of said cause.

  
Attorney for Defendant, Claude L.  
Crabtree

FILED

AUG 7 1962

ALICE J. DUCK, CLERK  
REGISTER