

S U M M O N S

STATE OF ALABAMA :

COUNTY OF BALDWIN:

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summon Curtis Roberts to appear within thirty days from the service of this writ in the Circuit Court of Baldwin County, Alabama, at the place of holding the same and then and there to plead, answer or demur to the complaint of James R. Betterton

Witness my hand this 19 day of July, 1962.

Bevel. Jones
CLERK

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C O M P L A I N T

JAMES R. BETTERTON,

Plaintiff,

vs.

CURTIS ROBERTS,

Defendant.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 5209

COUNT ONE

Plaintiff claims of the Defendant the sum of Six Hundred and No/100 (\$600.00) Dollars, as damages, for that heretofore and on, to-wit, the 18th day of November, 1961, while Melvin A. Betterton was driving the Plaintiff's automobile on and along Baldwin County Road No. 61, said highway being then and there a public highway in Baldwin County, Alabama, at a point south of Perdido, Alabama, approximately one-half mile north of its intersection with U. S. Highway 31, at said time and place the Defendant wilfully damaged Plaintiff's said automobile by so wilfully operating an automobile as to cause the same to run into, over, against, or upon said automobile of the Plaintiff, and as a direct and proximate consequence thereof, the said automobile

of the Plaintiff was badly bent, broken, crushed and otherwise damaged in the aforesaid sum; hence this suit.

FOREMAN & BROWN

By William H. Brigham
William H. Brigham

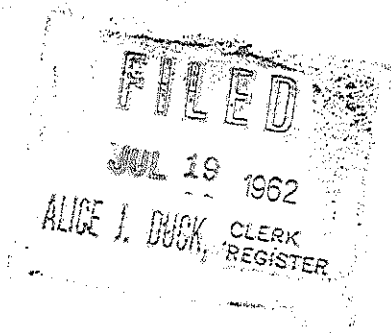
Plaintiff demands a trial by jury.

By William H. Brigham
William H. Brigham

Defendant may be served at:

Perdido, Alabama

En- 7-25-62



705209

James Betterton

VS

Curtis Roberts

Received 19 day of July 1962
and on 25 day of July 1962
I served a copy of the writ on Curtis Roberts

By service on _____

TAYLOR WILKINS Sheriff
By W. A. Zeller D.S.

Reckless

Sheriff claims 26 miles at
Ten Cents per mile Total \$ 2.60
TAYLOR WILKINS Sheriff
BY Zeller
Deputy Sheriff

FILED

JUL 19 1962

ALICE J. DUCK, CLERK
REGISTER

FOREMAN & BROWN
ATTORNEYS AT LAW
SUITE 214 FIRST NATIONAL BANK ANNEX
MOBILE 13, ALABAMA

ALEXANDER FOREMAN, JR.
ALTON R. BROWN, JR.
WILLIAM H. BRIGHAM, JR.

July 18, 1962

William H. Brigham

Mrs. Alice Duck, Clerk
Circuit Court of Baldwin County
Baldwin County Court House
Bay Minette, Alabama

RE: Our File No: 62-2030-WHC

Dear Mrs. Duck:

We enclose the summons and complaint of James R. Betterton vs. Curtis Roberts and the summons and complaint of Melvin A. Betterton vs. Curtis Roberts and respectfully request that you file same for us. Also we would appreciate it if these two cases could be set on the same day, if and when trial is necessary.

Yours very truly,

FOREMAN & BROWN

BY 
William H. Brigham

WHB:jw

enclosures

FOREMAN & BROWN
ATTORNEYS AT LAW
SUITE 214 FIRST NATIONAL BANK ANNEX
MOBILE 13, ALABAMA

ALEXANDER FOREMAN, JR.
ALTON R. BROWN, JR.
WILLIAM H. BRIGHAM

September 14, 1962

Honorable Hubert Hall, Judge
Circuit Court of Baldwin County
Baldwin County Court House
Bay Minette, Alabama

RE: James Betterton vs. Curtis Roberts
Case No: 5209
Our File No: 62-2030-WHC

Dear Judge Hall:

As no appearance has been filed in the above styled case, numbered as shown above, we wish to withdraw our demand for jury trial and request that a judgment by default with leave to prove damages be entered for the plaintiff.

Yours very truly,

FOREMAN & BROWN

BY

William H. Brigham
William H. Brigham

WHB:jw