

SUMMONS AND COMPLAINT

5215
Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. _____

FALL

TERM, 19 62

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon KATHERINE K. ROPAS

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 _____

KATHERINE K. ROPAS, Defendant

by _____

ROBERT J. ROSE, Plaintiff

Witness my hand this 24 day of July 19 62

Alice J. Luck, Clerk

Defendant resides at Elberta, Alabama.

ROBERT J. ROSE,
Plaintiff,

VS.

KATHERINE K. ROPAS,
Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN LAW NO. _____.

The Plaintiff claims of the Defendant the sum of EIGHT HUNDRED (\$800.00) DOLLARS as damages for that heretofore and on, to-wit: February 4th, 1962, the Plaintiff was lawfully operating his vehicle on Baldwin County Highway No. 87, and at a point thereon approximately 15 feet South of REA power pole No. 9/25, which said county road is at said point a public road in Baldwin County, Alabama, and at the same time and at the same place, the Defendant, Katherine K. Ropas, so negligently operated a motor vehicle so as to cause or allow the same the run into, upon or against the vehicle owned by the Plaintiff, so that the Plaintiff's vehicle was broken, damaged and crushed in that the front fenders, lights, grill, radiator, motor, door framing and wheels were smashed and bent, and that the said damages to the Plaintiff's vehicle were the proximate consequence and negligence of the Defendant aforesaid, hence this suit.

J. Cannon Owens, Jr.
Attorney for the Plaintiff

Plaintiff demands that this cause
be tried by Jury-

J. Cannon Owens, Jr.

FILED

JUL 24 1962

ALICE J. DUCK, CLERK
REGISTER

Sheriff claims _____ miles at

Ten Cents per mile Total \$ 8.40

TAYLOR WILKINS, Sheriff

BY _____
DEPUTY SHERIFF

Received _____ day of July 1962
and on 25 day of July 1962
I served a copy of the within on
on Katherine K. Ropas

By service on _____

TAYLOR WILKINS, Sheriff

Alberta

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

IN LAW NO. 5213.

ROBERT J. ROSE,

Plaintiff,

VS.

KATHERINE K. ROPAS,

Defendant.

SUMMONS & COMPLAINT

FILED

JUL 24 1962

Alice L. Duck, CLERK
REGISTER

J. CONNOR OWENS, JR.

ATTORNEY AT LAW

Dahlberg Building

BAY MINETTE, ALABAMA