

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 BENJAMIN YOUNG TRIMM and RILEY TRIMM to appear within thirty (30) 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 MACK AVENUE MOVING & STORAGE COMPANY, a Co-partnership.

WITNESS my hand this the 3 day of August, 1962.

Alice J. Duck
Clerk

MACK AVENUE MOVING & STORAGE CO.,)
a Co-Partnership, composed of)
Harold A. Gleiser and Melbert D.)
Gleiser,)

Plaintiff)

VS)

Benjamin Young Trimm and)
Riley Trimm,)

Defendants)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

5226

COUNT I

The Plaintiff claims of the Defendant, Benjamin Young Trimm, the sum of Six Thousand Four Hundred Eighty-four and 15/100 Dollars (\$6,484.15) as damages for that heretofore, on, to-wit, August 7, 1961, Plaintiff's vehicle, a truck and trailer, was lawfully being driven along U. S. Highway 90, a public highway, approximately six miles West of Loxley in Baldwin County, Alabama, at approximately four o'clock P. M., and then and there the Defendant, Benjamin Young Trimm, while driving an automobile, negligently passed Plaintiff's vehicle and applied brakes, causing Plaintiff's vehicle to strike the vehicle driven by the Defendant, Benjamin Young Trimm, in the rear and causing Plaintiff's vehicle to turn over, resulting in the damages as aforesaid in that the left side of the truck and trailer were damaged and bent; the saddle tanks were damaged; the motor was damaged; repainting was required; the truck and trailer were otherwise bent and damaged; a cross member was bent;

the frame was bent; a left spring was damaged; an axle was bent; and the truck and trailer were otherwise injured and rendered less valuable; and that towing charges were incurred; and that the use of the vehicle was lost to the damage of the Plaintiff; all as a proximate result of the negligence of the Defendant, Benjamin Young Trimm, as aforesaid.

COUNT II

The Plaintiff claims of the Defendants, Benjamin Young Trimm, and Riley Trimm, the sum of Six Thousand Four Hundred and 15/100 Dollars (\$6,484.15) damages for that heretofore, on, to-wit, August 7, 1961, Plaintiff's vehicle, a truck and trailer, was lawfully being driven along U. S. Highway 90, a public Highway, approximately six miles West of Loxley in Baldwin County, Alabama, at approximately four o'clock P. M., and then and there the Defendant, Benjamin Young Trimm, the agent, servant or employee of the Defendant, Riley Trimm, while acting within the line or scope of his employment as such agent, servant or employee, while driving an automobile, negligently passed Plaintiff's vehicle and turned in close ahead of Plaintiff's vehicle and applied brakes, causing Plaintiff's vehicle to strike the vehicle driven by the Defendant, Benjamin Young Trimm, in the rear, and causing Plaintiff's vehicle to turn over, resulting in the damage as aforesaid in that the left side of the truck and trailer were damaged, bent; the saddle tanks were damaged; the motor was damaged; repainting was required; the truck and trailer were otherwise bent and damaged; a cross member was bent; the frame was bent; a left spring was damaged; an axle was bent; and the truck and trailer were otherwise injured and rendered less valuable; and that towing charges were incurred; and that the use of the vehicle was lost to the damage of the Plaintiff, all as a proximate result and consequence of the negligence as aforesaid.

Plaintiff demands trial
by jury


Attorney for Plaintiff

Defendant's last known address:
Rt. 1, Box 493, Saraland, Ala.

Exp 8-8-62 on Riley Trimm
N.F. on Benjamin Young Trimm

FILED

C. G. C.
AUG 3 1962

ALICE J. DUCK, CLERK
REGISTER

5226 3302
SUMMONS & COMPLAINT

MACK AVENUE MOVING & STORAGE CO.,
a Co-Partnership, composed of
Harold A. Gleiser & Melbert D.
Gleiser,
Plaintiff

VS
BENJAMIN YOUNG TRIMM and RILEY
TRIMM,
Defendants

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

FILED

AUG 3 1962

ALICE J. DUCK, CLERK
REGISTER

CECIL G. CHASON
ATTORNEY AT LAW
FOLEY, ALABAMA

EXECUTED

This 8 day of Aug, 1962
by serving a copy of the within on
Riley Trimm
RAY D. BRIDGES, Sheriff
By H. Ferguson D.S.

RETURNED 8-3-62
Not found in my County after dili-
gent search and inquiry.
RAY D. BRIDGES, Sheriff
By H. Ferguson D.S.

RECEIVED

AUG 6 1962

SHERIFF'S OFFICE

CECIL G. CHASON

ATTORNEY-AT-LAW
FOLEY, ALABAMA

August 2, 1962

Mrs Alice J. Duck
Clerk of Court
Bay Minette, Alabama

Dear Mrs. Duck:

I am enclosing herewith Summons & Complaint
along with two copies in the case of Mack Avenue
Moving & Storage Co., a Co-Partnership, composed
of Harold A. Gleiser & Melbert D. Gleiser vs
Benjamin Young Trimm and Riley Trimm.

Yours very truly,



C. G. Chason

CGC:dc

Encl. 3

TO ANY SHERIFF OF THE STATE OF ALABAMA:-

WITNESS my hand this the 3 day of August, 1962.

Alice J. Luck
Clerk

天 地 人 物 事 理 法 義 禮 智 信 忠 孝 廉 恥

Plaintiffs

AT LANE

VS

Defendants

COUNT I

- 1 -

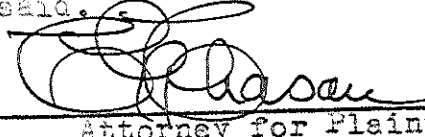
the frame was bent; a left spring was damaged; an axle was bent; and the truck and trailer were otherwise injured and rendered less valuable; and that towing charges were incurred; and that the use of the vehicle was lost to the damage of the Plaintiff; all as a proximate result of the negligence of the Defendant, Benjamin Young Trimm, as aforesaid.

COUNT II

The Plaintiff claims of the Defendants, Benjamin Young Trimm, and Riley Trimm, the sum of Six Thousand Four Hundred and 15/100 Dollars (\$6,484.15) damages for that heretofore, on, to-wit, August 7, 1961, Plaintiff's vehicle, a truck and trailer, was lawfully being driven along U. S. Highway 90, a public Highway, approximately six miles West of Loxley in Baldwin County, Alabama, at approximately four o'clock P. M., and then and there the Defendant, Benjamin Young Trimm, the agent, servant or employee of the Defendant, Riley Trimm, while acting within the line or scope of his employment as such agent, servant or employee, while driving an automobile, negligently passed Plaintiff's vehicle and turned in close ahead of Plaintiff's vehicle and applied brakes, causing Plaintiff's vehicle to strike the vehicle driven by the Defendant, Benjamin Young Trimm, in the rear, and causing Plaintiff's vehicle to turn over, resulting in the damage as aforesaid in that the left side of the truck and trailer were damaged, bent; the saddle tanks were damaged; the motor was damaged; repainting was required; the truck and trailer were otherwise bent and damaged; a cross member was bent; the frame was bent; a left spring was damaged; an axle was bent; and the truck and trailer were otherwise injured and rendered less valuable; and that towing charges were incurred; and that the use of the vehicle was lost to the damage of the Plaintiff, all as a proximate result and consequence of the negligence as aforesaid.

Plaintiff demands trial
by jury

Defendant's last known address:
Rt. 1, Box 493, Saraland, Ala.


Attorney for Plaintiff

[illegible]

RECEIVED
JAN 10 1964
FEDERAL BUREAU OF INVESTIGATION
U. S. DEPARTMENT OF JUSTICE
WASHINGTON, D. C. 20535

MACMACK AVENUE MOVING & STORAGE CO
a Co-Partnership, composed of
Harold A. Gleiser & Melbert D.
Gleiser,

Plaintiff

Defendants

AT LAW

Saraland

AUG 3 1952

CLERK
REGISTERED

