

ELLIS J. LONG,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
Vs.	X	BALDWIN COUNTY, ALABAMA
JOHN BENJAMIN STEWART and	X	AT LAW
R. J. BOYINGTON,	X	CASE NO. 5282
Defendants.	X	

Comes now the Defendants in the above styled cause, and for answer to the Plaintiff's Complaint and each and every count therein says as follows:

1.

That they are not guilty of the matters alleged therein.

WILTERS & BRANTLEY

BY: *Robert M. Brantley*
Attorney for Defendants

FILED
MAR 7 1963
ALICE J. DUCK, CLERK
REGISTER

ELLIS J. LONG,

Plaintiff,

vs.

JOHN BENJAMIN STEWART and
R. J. BOYINGTON,

Defendants.

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 5282

PLEAS

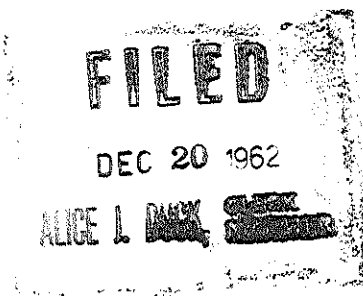
Comes now the Defendants in the above styled cause and files
the following pleas to the Complainant's Complaint:

1.

Not guilty.

2.

The Defendants are not guilty of the matters alleged therein.



WILTERS & BRANTLEY

BY:

Lochner M Brantley
Attorneys for the Defendants

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STATE OF ALABAMA)
 *
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon John Benjamin Stewart and R. J. Boyington to appear within thirty days from the service of this writ in the Circuit Court, to be held for said county at the place of holding the same, then and there to answer the complaint of Ellis J. Long.

WITNESS MY HAND, this the 19 day of September, 1962.

Alice J. Clark
Clerk

The Defendant, John Benjamin Stewart, may be served at Rabun Route, Bay Minette, Ala. Please serve Mr. Stewart and ascertain the place of residence of R. J. Boyington.

* * * * *

ELLIS J. LONG)	
)	
Plaintiff,)	IN THE CIRCUIT COURT OF
)	
VS.)	BALDWIN COUNTY, ALABAMA
)	
JOHN BENJAMIN STEWART and)	AT LAW
R. J. BOYINGTON,)	<u>5282</u>
)	
Defendants.)	

COMPLAINT

The Plaintiff claims of the Defendants ONE HUNDRED SEVENTY-FIVE DOLLARS (\$175.00) damages for that heretofore on, to-wit: December 29, 1961, the Defendant, John Benjamin Stewart, who was then and there an agent, servant or employee of the Defendant, R. J. Boyington, acting within the line and scope of his authority as such agent, servant or employee so negligently operated a motor vehicle on Baldwin County Road No. 47 at the place of the said road's intersection with the Quincy Road in Baldwin County, Alabama, so as to cause it to run into, upon, or against the automobile of Plaintiff and as a proximate consequence and result of said negligence the Plaintiff's said automobile was damaged as follows: the right rear

door was bent and damaged; the entire right side of the Plaintiff's automobile was bent, broken and damaged all to the Plaintiff's damage as aforesaid. Plaintiff avers that all of his said damages were caused as a direct and proximate consequence of the negligence of the Defendant, John Benjamin Stewart, who was then and there an agent, servant or employee of the Defendant, R. J. Boyington, acting within the line and scope of his authority as such agent, servant or employee, hence this suit.


Attorney for Plaintiff

FILED
SEP 19 1962
ALICE J. DUCK, CLERK
REGISTER

Received 19 day of Sept 1962
and on 20 day of Sept 1962
I served a copy of the within
on John Benjamin Stewart
R. J. Boyington
By service on _____

TAYLOR WILKINS, Sheriff
By W. A. Salbert D. S.
Stockton and
Rabon

Sheriff claims 46 miles at
Ten Cents per mile Total \$ 4.60
TAYLOR WILKINS, Sheriff
BY Salbert
DEPUTY SHERIFF

5282
ELLIS J. LONG,

Plaintiff,

VS.

JOHN BENJAMIN STEWART and R.
J. BOYINGTON,

Defendants.

FILED
SEP 19 1962
JAMES R. OWEN
BAY MINETTE, ALABAMA

JAMES R. OWEN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA