

LOUIS WILLIAMS

PLAINTIFF

VS

R. J. HOUSTON, SR. AND  
R. J. HOUSTON, JR.

DEFENDANTS

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

5304

COMPLAINT

The Plaintiff claims of the Defendants the sum of One Thousand (\$1,000.00) Dollars as damages for that heretofore on, to-wit: the 17th day of May 1962, the Defendant, R. J. Houston, Jr., while acting within the line and scope of his employment as agent, servant or employee of the Defendant, R. J. Houston, Sr., so negligently operated a motor vehicle westwardly and northwardly on U. S. highway 98, at its intersection with the Edgewater Heights road, at Daphne, Alabama, in Baldwin County, Alabama, so as to cause or allow said vehicle to collide with a motor vehicle owned by the Plaintiff, and being operated at a place where it had a lawful right to be, and as a direct and proximate result of the negligence of the Defendant, R. J. Houston, Jr., while acting within the line of the scope of his employment as agent, servant, or employee of the Defendant, R. J. Houston, Sr. the Plaintiff's automobile was crushed, bent, broken and damaged in and about the back end and extreme front end; all to Plaintiff's great damage, hence this suit.

*James A. Inni*  
Attorney for Plaintiffs

FILED

SEP 22 1962

ALICE L. DICK, CLERK  
REGISTER

Received 27 day of Sept 1962  
and on 28 day of Oct 1962  
I served a copy of the within S & C  
on R. J. Houston Sr &  
R. J. Houston, Jr.  
By service on R. J. Houston Sr. & Jr.

Sheriff claims 140 miles at

Ten Cents per mile Total \$ 14.00

TAYLOR WILKINS Sheriff

BY

*Leibert*  
DEPUTY SHERIFF

TAYLOR WILKINS, Sheriff

By *Fred Herbert* D. S.

*Ballie Webb*

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

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

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

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon R. J. Houston, Sr. and R. J. Houston, Jr.

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 \_\_\_\_\_

R. J. Houston, Sr. and R. J. Houston, Jr., Defendant S.

by Louis Williams

\_\_\_\_\_, Plaintiff.

Witness my hand this 27 day of Sept 1962

Alice J. Duck, Clerk

**STATE of ALABAMA**

Baldwin County

**CIRCUIT COURT**Louis Williams

Plaintiffs

vs.

R. J. Houston, Sr. andR. J. Houston, Jr.Battlesworth 8-2853 Defendants**Summons and Complaint**

Filed

**FILED**

19\_\_

SEP 27 1962

Clerk

ALICE J. DUCK,

CLERK  
REGISTERJames A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Daphne, Alabama

Received In Office

, 19\_\_

Sheriff.

I have executed this summons

this

19\_\_

by leaving a copy with

Sheriff.

Deputy Sheriff.

JAMES A. BRICE

ATTORNEY AT LAW

FOLEY, ALABAMA

P.O. Box 298

WHITEHALL 3-3601

February 6, 1963

Mrs. Alice J. Duck  
Circuit Clerk  
Bay Minette, Alabama

Dear Mrs. Duck

Re: Louis Williams  
Vs: R. J. Houston  
At Law, No. 5304

Please dismiss the above complaint and send me a  
cost bill.

The case should be removed from the February 12th  
non-jury docket.

Sincerely,

  
James A. Brice

JAB:j

cc: Judge H. M. Hall  
Bay Minette, Alabama

cc: Mr. Bill Bailey  
Fairhope, Alabama