

ALBERT WILLINGHAM
PLAINTIFF
VS
WILLIAM ELONZO RICE, JR.
DEFENDANT

) IN THE CIRCUIT COURT OF
)
) BALDWIN COUNTY, ALABAMA
)
) AT LAW
)
) NUMBER: 5331
)

PLEA

Comes now Defendant in the above styled cause and for answer to the complaint in this cause says:

1. The action is barred by the statute of limitation of one Year.

W. L. Day
Attorney for Defendant

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 12 day of Oct 1967 served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing the same by United States Mail, properly addressed, with first class postage prepaid.

W. L. Day

FILED

OCT 19 1967

ALICE J. BISHOP CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. ~~6006~~ 5331

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

William Elonzo Rice, Jr.

.....TERM, 19.....

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.....

William Elonzo Rice, Jr

....., Defendant.....

by Albert Willingham

....., Plaintiff.....

Witness my hand this 24 day of February 19 65.

Chief Clerk Clerk

24:9-5-67

No. 5331
6109

No. Page.....

STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

ALBERT WILLINGHAM

Plaintiffs

vs.

WILLIAM ELONZO RICE Jr.

Defendants

SUMMONS AND COMPLAINT

Filed 2-24 19 65

Alice J. Duck

Clerk

C. G. Hason

Plaintiff's Attorney

Defendant's Attorney

OCT 3 1965
Defendant lives at

RECEIVED
TAYLOR WILLIAMS
SHERIFF
Received In Office

2/24 APR 26 1965 1965

TAYLOR WILLIAMS
SHERIFF

I have executed this summons

this 19.....

by leaving a copy with

Returned 21 day of March 19.....

Not found in my county after diligent search and
return

Taylor Williams Sheriff
Roy Randall Deputy Sheriff

Served Oct 5-67 Jr.
Williams Elonzo Rice

Point Clear

Sheriff charges 80 miles at

Ten Cents per mile Total 8.00

Taylor Williams Sheriff

Roy Randall Deputy Sheriff

Point Clear
Could not find out at Leo

ALBERT WILLINGHAM,)	
)	
PLAINTIFF)	IN THE CIRCUIT COURT OF
)	
VS)	BALDWIN COUNTY, ALABAMA
)	
WILLIAM ELONZO RICE, JR,)	AT LAW
)	Mo. 449 5331
DEFENDANT)	

Amended Complaint

The Plaintiff claims of the Defendant the sum of One Thousand Dollars (\$1,000.00) as damages for that on, to-wit, the 3rd day of April, 1962, while operating a motor vehicle on Alabama Highway 59 south of the City of Foley, Alabama, at or near the intersection of County Road # 12, all in Baldwin County, Alabama, a public highway, the Defendant William Elonzo Rice, Jr negligently ran an automobile operated by him into, upon or against the automobile operated by the Plaintiff, and which was in his charge and for which he is responsible, and as a proximate result and consequence of the negligence of the Defendant, the vehicle operated by the Plaintiff was sorely damaged in that the right front side and fender was crushed, bent, broken and rendered useless; that Plaintiff was deprived of the use of his automobile necessary in and about his business, all to Plaintiff's damage as aforesaid.


 Attorney for Plaintiff

Defendant resides in Fairhope, Alabama

FILED
 FEB 24 1962
 BALDWIN COUNTY, ALA.

SUMMONS AND COMPLAINT

~~6110~~ No. 5331

ALBERT WILLINGHAM,

PLAINTIFF

VS

WILLIAM ELONZO RICE, JR.,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CECIL G. CHASON
ATTORNEY AT LAW
FOLEY, ALABAMA

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No.-----

-----TERM, 19-----

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the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against -----

William Elonzo Rice, Jr.-----, Defendant-----

by -----

Albert Willingham-----, Plaintiff-----

Witness my hand this 18 day of Oct 1962

Deezy Duck-----, Clerk

N.F.

STATE of ALABAMA

Baldwin County

CIRCUIT COURTAlbert Willingham

Plaintiffs

vs.

William Elonzo Rice, Jr.

Defendants

Summons and Complaint

Filed

FILED

19

OCT 18 1962

Clerk

MADE & DICK, CLERK
REGISTERJames A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Fairhope, Alabama

Received In Office

, 19

Sheriff.

I have executed this summons

this

19

by leaving a copy with

Returned

23 day ofMay1962Not a return, copy, after diligent search and
guilty.Taylor Wilkins, Sher.

By

Robert

Deputy Sheriff

Sheriff.

Deputy Sheriff.

ALBERT WILLINGHAM

PLAINTIFF

VS

WILLIAM ELONZO RICE, JR.,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COMPLAINT

The Plaintiff claims of the Defendant the sum of Seven Hundred Fifty and NO/100 (\$750.00) Dollars as damages for that heretofore on, to-wit: the 3rd day of April 1962, the Plaintiff was operating his motor vehicle southwardly on a public road, viz: Alabama Highway #59, south of Foley, Alabama, where he had a lawful right to be, and the Defendant, William Elonzo Rice, Jr., so negligently operated a motor vehicle then and there as to cause said motor vehicle to run into, upon and against the automobile the Plaintiff was operating and which Plaintiff owned; and Plaintiff avers that as a proximate consequence thereof, the Plaintiff's vehicle was damaged in and about the right front and right front side, the repair of which Plaintiff has incurred expenses; and further, that as a direct and proximate result of the aforesaid negligence of the defendant, Plaintiff's automobile and all parts thereof were crushed, bent, broken and rendered useless; that Plaintiff has been and will be deprived of the use of his automobile necessary in and about his work, for an indefinite period of time, all to Plaintiff's damage, hence this suit.


Attorney for Plaintiff

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No. _____

_____ TERM, 19____

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William Elonzo Rice, Jr.

_____, Defendant_____

by _____

Albert Willingham

_____, Plaintiff_____

Witness my hand this _____ day of _____ 19____

_____, Clerk

No.

5331

Page

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

Albert Willingham

Plaintiffs

vs.

William Elonzo Rice, Jr.

Defendants

Summons and Complaint

Filed

FILED

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OCT 18 1962

Clerk

**ALICE J. DUCK, CLERK
REGISTER**

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Fairhope, Alabama

Received In Office

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Sheriff.

I have executed this summons

this

19

by leaving a copy with

Sheriff.

Deputy Sheriff.

ALBERT WILLINGHAM

PLAINTIFF

VS

WILLIAM ELONZO RICE, JR.,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COMPLAINT

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James A. Rice
Attorney for Plaintiff

Received 18th day of Oct 1962

and on day of 19

I served a copy of the within J. C.

on Wm. Elonzo Rice, Jr.

J. C.

By service on

TAYLOR WILKINS, Sheriff

By D. S.

FILED
OCT 18 1962
CLERK
REGISTER