

5405

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Clarence A. Robertson to appear within 30 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 Carl D. Brazile.

WITNESS MY HAND this 12 day of December, 1962.

Alice J. Luck
Clerk

Defendant's address is
Route 1, Box 261,
Robertsdale, Alabama

* * * * *

CARL D. BRAZILE,	)	IN THE CIRCUIT COURT OF
Plaintiff,	)	BALDWIN COUNTY, ALABAMA
VS.	)	AT LAW
CLARENCE A. ROBERTSON,	)	
Defendant.	)	

COMPLAINT
COUNT ONE

The Plaintiff claims of the Defendant Three Thousand Dollars (\$3,000.00) for that heretofore, on to-wit: December 16, 1961, the Plaintiff was driving his automobile on United States Highway No. 90 at a point 1.6 miles North of the center of Roberts-
dale in Baldwin County, Alabama, where he had a right to be, and the said Defendant at said time and place so negligently operated a motor vehicle so as to cause it to run into, upon or against the automobile of the Plaintiff and as a proximate consequence of the negligence of the said Defendant the Plaintiff's automobile was bent, broken and damaged; the right front fender was bent and damaged; the hood of the automobile was bent and damaged; the front

windshield of the automobile was broken and the air conditioning unit was severely damaged, all to the Plaintiff's damages aforesaid. Plaintiff avers that all of the damages to his said automobile were the proximate result of the negligence of the Defendant, hence this suit.

COUNT TWO

The Plaintiff claims of the Defendant Three Thousand Dollars (\$3,000.00) for that heretofore on to-wit: December 16, 1961, while Plaintiff was driving his automobile on United States Highway No. 90 at a point 1.6 miles North of the center of Robertsdale in Baldwin County, Alabama, at a place where he had a right to be, the Defendant willfully and wantonly damaged the said Plaintiff's automobile by willfully and wantonly operating a motor vehicle so as to cause it to run into, upon or against the automobile of the Plaintiff and as a direct and proximate consequence of the willful and wanton negligence of the Defendant, the Plaintiff's automobile was damaged as follows: the right front fender was bent and damaged; the hood of the automobile was bent and damaged; the front windshield of the automobile was broken and the air conditioning unit was severely damaged. Plaintiff avers that all of his said damage was a direct and proximate result of the willful and wanton negligence of the Defendant, hence this suit.

COUNT THREE

The Plaintiff claims of the Defendant Twenty-five Thousand Dollars (\$25,000.00) for that heretofore on to-wit: December 16, 1961, the Plaintiff was driving his automobile on United States Highway 90 at a point 1.6 miles North of the center of Robertsdale in Baldwin County, Alabama, at a place where he had a right to be and at said time and place the Defendant so negligently operated a motor vehicle as to cause it to run into, upon or against the automobile of Plaintiff and as a direct and proximate consequence of the negligence of the said Defendant, the Plaintiff was injured as follows: his ribs were fractured; his diaphragm was torn and bruised; he was made sick, sore and nervous and was put

to considerable expense in and about medical treatment of his injuries and he was disabled and unable to work for a period of twelve months and Plaintiff avers that all of his injuries were the direct and proximate result of the negligence of the said Defendant at the time and place complained of, hence this suit.

COUNT FOUR

The Plaintiff claims of the Defendant Twenty-five Thousand Dollars (\$25,000.00) for that heretofore on to-wit: December 16, 1961, the Plaintiff was driving his automobile on United States Highway No. 90 at a point 1.6 miles North of the center of Robertsdale in Baldwin County, Alabama, at a place where he had a right to be and at said time and place the Defendant willfully and wantonly injured the Plaintiff by willfully and wantonly driving a motor vehicle upon, into or against the automobile of Plaintiff and as a proximate result of the willfull and wanton negligence of the said Defendant the Plaintiff was injured as follows: his ribs were fractured; his diaphragm was torn and bruised; he was made sick, sore and nervous and he was disabled and unable to work for a period of twelve months. Plaintiff avers that all of his injuries were the direct and proximate result of the willful and wanton negligence of the Defendant at said time and place, hence this suit.

J. B. Blashburn
Attorney for Plaintiff

Plaintiff demands a trial by jury of said cause.

J. B. Blashburn
Attorney for Plaintiff

FILED

DEC 12 1962

ALICE J. DUCK, CLERK
REGISTER

5403
2837
CARL D. BRAZILE,
VS. Plaintiff,

CLARENCE A. ROBERTSON,
423 - Foley Street
Prichard, Ala Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

Received 21 day of June 1965
and on _____ day of _____ 19____
served a copy of the within D & C
on Clarence A. Robertson
by service on _____

TAYLOR WILKINS, Sheriff

By _____ D. 3

RETURNED 6-8-65

Not found in my County after dili-

gent search and inquiry.

RAY D. BRIDGEMAN, Sheriff

By W. E. Connerly S.

~~Received 12 day of Dec. 1962
and on _____ day of _____ 19____
I served a copy of the within D & C
on _____~~

~~By Clarence A. Robertson Sheriff~~

~~Returned 1-5-66 By Ray 1966
Not found in my county after diligent search and in-
quiry.~~

J. B. BLACKBURN
BY ATTORNEY AT LAW
BAY MINETTE, ALABAMA

STATE OF ALABAMA)
 *
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Clarence A. Robertson to appear within 30 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 Carl D. Brazile.

WITNESS MY HAND this 12 day of December, 1962.

Alice J. Luck
Clerk

Defendant's address is
Route 1, Box 261,
Robertsdale, Alabama

* * * * *

CARL D. BRAZILE,
 Plaintiff,
VS.
CLARENCE A. ROBERTSON,
 Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
5405

COMPLAINT

COUNT ONE

The Plaintiff claims of the Defendant Three Thousand Dollars (\$3,000.00) for that heretofore, on to-wit: December 16, 1961, the Plaintiff was driving his automobile on United States Highway No. 90 at a point 1.6 miles North of the center of Roberts- dale in Baldwin County, Alabama, where he had a right to be, and the said Defendant at said time and place so negligently operated a motor vehicle so as to cause it to run into, upon or against the automobile of the Plaintiff and as a proximate consequence of the negligence of the said Defendant the Plaintiff's automobile was bent, broken and damaged; the right front fender was bent and dam- aged; the hood of the automobile was bent and damaged; the front

windshield of the automobile was broken and the air conditioning unit was severely damaged, all to the Plaintiff's damages aforesaid. Plaintiff avers that all of the damages to his said automobile were the proximate result of the negligence of the Defendant, hence this suit.

COUNT TWO

The Plaintiff claims of the Defendant Three Thousand Dollars (\$3,000.00) for that heretofore on to-wit: December 16, 1961, while Plaintiff was driving his automobile on United States Highway No. 90 at a point 1.6 miles North of the center of Roberts-
dale in Baldwin County, Alabama, at a place where he had a right to be, the Defendant willfully and wantonly damaged the said Plaintiff's automobile by willfully and wantonly operating a motor vehicle so as to cause it to run into, upon or against the automobile of the Plaintiff and as a direct and proximate consequence of the willful and wanton negligence of the Defendant, the Plaintiff's automobile was damaged as follows: the right front fender was bent and damaged; the hood of the automobile was bent and damaged; the front windshield of the automobile was broken and the air conditioning unit was severely damaged. Plaintiff avers that all of his said damage was a direct and proximate result of the willful and wanton negligence of the Defendant, hence this suit.

COUNT THREE

The Plaintiff claims of the Defendant Twenty-five Thousand Dollars (\$25,000.00) for that heretofore on to-wit: December 16, 1961, the Plaintiff was driving his automobile on United States Highway 90 at a point 1.6 miles North of the center of Roberts-
dale in Baldwin County, Alabama, at a place where he had a right to be and at said time and place the Defendant so negligently operated a motor vehicle as to cause it to run into, upon or against the automobile of Plaintiff and as a direct and proximate consequence of the negligence of the said Defendant, the Plaintiff was injured as follows: his ribs were fractured; his diaphragm was torn and bruised; he was made sick, sore and nervous and was put

to considerable expense in and about medical treatment of his injuries and he was disabled and unable to work for a period of twelve months and Plaintiff avers that all of his injuries were the direct and proximate result of the negligence of the said Defendant at the time and place complained of, hence this suit.

COUNT FOUR

The Plaintiff claims of the Defendant Twenty-five Thousand and Dollars (\$25,000.00) for that heretofore on to-wit: December 16, 1961, the Plaintiff was driving his automobile on United States Highway No. 90 at a point 1.6 miles North of the center of Robertsdale in Baldwin County, Alabama, at a place where he had a right to be and at said time and place the Defendant willfully and wantonly injured the Plaintiff by willfully and wantonly driving a motor vehicle upon, into or against the automobile of Plaintiff and as a proximate result of the willfull and wanton negligence of the said Defendant the Plaintiff was injured as follows: his ribs were fractured; his diaphragm was torn and bruised; he was made sick, sore and nervous and he was disabled and unable to work for a period of twelve months. Plaintiff avers that all of his injuries were the direct and proximate result of the willful and wanton negligence of the Defendant at said time and place, hence this suit.

J. B. Blackburn
Attorney for Plaintiff

Plaintiff demands a trial by jury of said cause.

J. B. Blackburn
Attorney for Plaintiff

FILED

DEC 12 1961

ALICE L. DUCK, CLERK
REGISTER

J. B. BLACKBURN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA

May 31, 1965

5405-
Mrs. Alice J. Duck
Clerk
Bay Minette, Alabama

Dear Mrs. Duck:

A good while ago we filed a suit for Carl D. Brazile against Clarence A. Robinson on the law side of the Circuit Court.

Mr. Robinson has never been served since we did not have an address for him. We now have an address which is 423 Foley Street, Prichard, Alabama, and would appreciate it if you would have this complaint sent to Mobile County for service.

Yours very truly,


JAMES R. OWEN

JRO/ers