

BAKER BROWNELL,

Plaintiff

vs.

MABEL QUATES,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN LAW

NO.

41809

Plaintiff claims of the Defendant a sum of \$150.00 for that on heretofore, to-wit: the 17th day of August, 1960, the Plaintiff's automobile was parked on a country road in the community of Bon Secour, Alabama, at about 11:50 A.M., at a point on said road at the side of Meme's Restaurant, which said county road is at said point a public road in Baldwin County, Alabama, and at the same time, at the same place, the Defendant, Mabel Quates, so negligently operated a motor vehicle so as to have caused or allow the same to run into, upon, or against the Plaintiff's vehicle so that the left front door was bent, the windshield smashed, and the left front fender was bent, all as a proximate result of the negligence of the Defendant aforesaid, hence this suit.

James Rivers Jr.
Attorney for Plaintiff

Defendant, Mabel Quates, resides
upon Star Route, Bon Secour, Alabama.

FILED

AUG 9 1961

ALICE J. DUCK, CLERK
REGISTER

Received 9 day of Aug 1961
on 12 day of Aug 1961
I served a copy of the within St C
on Mabel Quates

By service on _____

TAYLOR WILKINS, Sheriff
By Charles Childers

Ben Secor

Sheriff claims 86 miles at

Ten Cents per mile Total \$ 8.60

TAYLOR WILKINS, Sheriff

By Charles Childers

DEPUTY SHERIFF

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN LAW NO. 4809

BAKER BROWNELL,
Plaintiff

vs.

MABEL QUATES,
Defendant

SUMMONS AND COMPLAINT

FILED

AUG 9 1961

ALICE J. DUCK, CLERK
REGISTER

J. CONNOR OWENS, JR.
ATTORNEY AT LAW
Dahlberg Building
BAY MINETTE, ALABAMA