

LEONARD KING

PLAINTIFF

VS

WOODROW O'FERRELL

DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

4817

COMPLAINT

The Plaintiff claims of the defendant the sum of One Thousand Two Hundred Eight and 05/100 (\$1,208.05) Dollars, as damages, for that heretofore on, to-wit: the 14th day of August 1960, the Plaintiff was operating his motor vehicle Southwardly on a public highway, viz: U. S. Highway No. 31 at a point in Baldwin County, Alabama 8.7 miles North of the corporate limits of Mobile, Alabama, where he and said vehicle had a right to be, and the Defendant, Woodrow O'Ferrell, so negligently operated a motor vehicle then and there as to cause said motor vehicle he was operating run into, upon and against the automobile the Plaintiff was operating; and Plaintiff avers that as a proximate consequence thereof the Plaintiff's vehicle was damaged in and about the front end left front side, the repair of which Plaintiff has incurred expense, all to his damage, hence this suit.

FILED  
AUG 14 1961  
ALICE J. DUCK, CLERK  
REGISTER

*James A. Davis*  
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....

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon Woodrow O'Ferrell

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 .....

..... Woodrow O'Ferrell ....., Defendant.....

by .....

..... Leonard King ....., Plaintiff.....

Witness my hand this 14 day of Aug 19 61

Ed - 11-8-62

W. J. Spack, Clerk

No. 4817

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**STATE of ALABAMA**

**Baldwin County**

**CIRCUIT COURT**

Leonard King

Plaintiffs

vs.

Woodrow O'Ferrell

Defendants

**Summons and Complaint**

**FILED**

Filed \_\_\_\_\_

19 \_\_\_\_\_

**AUG 14 1961**

ALICE J. DUCK, CLERK  
REGISTER

Clerk

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Spanish Fort Estates

Received In Office

8/14, 1961

Sheriff.

I have executed this summons

this 8-16

1961

by leaving a copy with

Not found lives in  
Greenhill all

Returned 16 day of Aug

1961

Not found in my county after diligent search and-i  
guiry.

Taylor Wilkins, Sheriff

By W. O. Garner

Deputy Sheriff

Serving a copy of the within  
on Woodrow O'Ferrell  
This the 8th day of November  
1962.

James M. Brock

Sheriff.

By Rennie Edson