

COMPLAINT.

JOHN M. KILBORN, : IN THE CIRCUIT COURT OF
Plaintiff, : BALDWIN COUNTY, ALABAMA
versus : AT LAW
MRS. MARY STUART, :
Defendant. : NO. 4832

COUNT ONE

Plaintiff claims of the Defendant FIVE HUNDRED AND NO/100ths (\$500.00) DOLLARS as damages for this:

On to-wit July 31, 1961 Plaintiff was the owner of an automobile then being operated northwardly at Gulf Shores, Alabama, on a highway leading north from the four-way intersection of the road east to west leading to Fort Morgan with the road leading south-north from the Gulf of Mexico, which roadway meanders northwardly and eastwardly towards the Intrastate Waterway Canal and the Bridge over such canal. At that time and place Defendant was operating an automobile southwardly on the same roadway approaching Plaintiff's automobile. At such time and place, the aforesaid road being a public highway, Defendant negligently drove the automobile being operated by her upon and against Plaintiff's automobile. As a direct and proximate consequence of the negligence aforesaid Plaintiff's automobile was smashed and broken on the left side, and it was otherwise bent and thrown out of line, all to Plaintiff's damage in the amount claimed. Wherefore this suit.


ATTORNEY FOR PLAINTIFF

Defendant's Address:

211 E First Street
Bay Minette, Alabama.

SUMMONS

JOHN M. KILBORN, : IN THE CIRCUIT COURT OF
Plaintiff, : BALDWIN COUNTY, ALABAMA
versus : AT LAW
MRS. MARY STUART, :
Defendant. : NO.

THE STATE OF ALABAMA)
BALDWIN COUNTY) CIRCUIT COURT

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Mrs. Mary Stuart to appear within thirty days from service of this process, in the Circuit Court of Baldwin County, Alabama, at the place of holding the same, then and there to answer the complaint of John M. Kilborn.

WITNESS:

Clerk of said Court, this

24 day of Aug, 1961.

ATTEST:

Cliff Luck
Clerk

SHERIFF'S RETURN

Received _____ day of _____, 1961 _____ and
on _____ Day of _____, 1961, I served a
copy of the within _____ on

by service on _____

TAYLOR WILKINS, SHERIFF

By _____ D. S.

VINCENT F. KILBORN

LAWYER

FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

TELEPHONE HEMLOCK 2-2635

CABLE ADDRESS: VEEKAY

August 23, 1961

VINCENT F. KILBORN
MICHAEL J. SALMON
BENJAMIN H. KILBORN
WILLIS C. DARBY, JR.
ABRAHAM A. MITCHELL

Mrs. Alice Duck
Clerk, Circuit Court
Court House
Bay Minette, Alabama

RE: JOHN M. KILBORN
VS: MRS. MARY STUART

Dear Mrs. Duck:

I enclose herewith Complaint and Summons in the above styled cause which I would thank you to file for me. Please acknowledge receipt of same.

Very truly yours,



VINCENT F. KILBORN

VFK:sfh
Encl.

VINCENT F. KILBORN

LAWYER

FIRST NATIONAL BANK BUILDING

MOBILE, ALABAMA

TELEPHONE HEMLOCK 2-2635

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ATTORNEY FOR PLAINTIFF

Defendant's Address:

211 E First Street
Bay Minette, Alabama.

FILED
AUG 24 1961
ALICE L. DUCK, CLERK
REGISTER

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24 day of Aug, 1961.

ATTEST:

Blaise J. Luck
Clerk

SHERIFF'S RETURN

Received _____ day of _____, 1961 _____ and
on _____ Day of _____, 1961, I served a
copy of the within _____ on

by service on _____

TAYLOR WILKINS, SHERIFF

Not Found

By _____ D. S.

4832

John M. Kalborn

VS

Mrs. Mary Stuart

Received 24 day of Aug 1961
and on _____ day of _____ 19____
I served a copy of the within _____
on Mrs. Mary Stuart
By service on _____

TAYLOR WILKINS, Sheriff
By _____ D.S.

Returned 1 day of Sept 1961

Not found in my county after diligent search and inquiry.

Taylor Wilkins, Sheriff
By W. C. Zolbert
Deputy Sheriff

FILED
AUG 24 1961
ALICE J. DUCK, CLERK
REGISTER