

4919

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon George Woolf and Hayward Johnson to appear within thirty 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 Earl A. Bryars, Jr.

WITNESS my hand this 19 day of October, 1961.

Alfred J. Duck
Clerk

Ex - 10-25-62

EARL A. BRYARS, JR.,

Plaintiff,

VS.

GEORGE WOOLF and HAYWARD
JOHNSON,

Defendants.

}
} IN THE CIRCUIT COURT OF

}
} BALDWIN COUNTY, ALABAMA

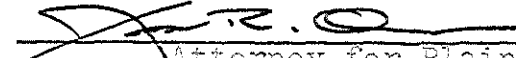
}
} AT LAW

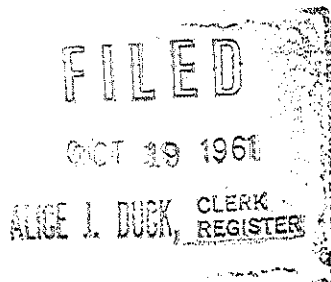
C O M P L A I N T

COUNT ONE

The Plaintiff claims of the Defendants the sum of Two Hundred Fifty Dollars (\$250.00) for that heretofore on to-wit, October 22, 1960, the Defendant, Hayward Johnson, who was then and there an agent, servant or employee of the Defendant, George Woolf, acting within the line and scope of his authority as such agent, servant or employee, so negligently operated a motor vehicle as to cause it to run into, upon or against a motor vehicle of the Plaintiff on a public street seven-tenths of a mile North of Perdido in Baldwin County, Alabama, on Railroad Street and as a proximate result of the negligence of the said Defendant, Hayward Johnson, who was then and there an agent, servant or employee of the Defendant, George Woolf, acting within the line and scope of his

authority as such agent, servant or employee, the Plaintiff's motor vehicle was damaged as follows: left front door was bent and damaged; the left front fender was demolished; the left front fender skirt was damaged; the radiator was bent and broken and the front bumper was bent, all to his damage as aforesaid, hence this suit.


Attorney for Plaintiff



70.4919

Sheriff claims 28 miles at
Ten Cents per mile Total \$ 2.80
TAYLOR WILKINS, Sheriff
BY W. A. Tolbert
DEPUTY SHERIFF

EARL A. BRYARS, JR.,
Plaintiff,
VS.
GEORGE WOOLF and HAYWARD JOHNSON,
Defendants.

Received 19 day of Oct 1941
and on 25 day of Oct 1941
I served a copy of the within
on George Woolf
By service on George Woolf
TAYLOR WILKINS, Sheriff
By W. A. Tolbert D. S.
1 mile north of B.M.
TAYLOR WILKINS, Sheriff
By W. A. Tolbert D. S.
1 mile north of B.M.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

FILED
OCT 19 1941
AUGIE J. DUCK, CLERK
REGISTER
JAMES R. OWEN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA

Received 19 day of Oct 1941
and on 25 day of Oct 1941
I served a copy of the within
on Hayward Johnson
By service on Hayward Johnson