

**BALDWIN**  
**The State of Alabama, ~~Frank~~ County**  
**CIRCUIT COURT**

TO ANY SHERIFF OF THE STATE OF ALABAMA—GREETING:

You are hereby commanded to summon

**BEN GARRIEK**

**Baldwin**

to appear in the Circuit Court of ~~Frank~~ County, Alabama, at the place of holding the same and plead, answer, or demur, within thirty days from service hereof to the complaint of

**FRANK KELLEY**

Witness this 19 day of JULY 1963

Alice J. Duck, Clerk

IF THE DEFENDANT FAILS TO APPEAR AND PLEAD, ANSWER OR DEMUR WITHIN THIRTY DAYS AFTER SERVICE, THE PLAINTIFF MAY TAKE JUDGMENT BY DEFAULT

**COMPLAINT**

**FRANK KELLEY**

vs.

**BEN GARRIEK**

120,564.1

Plaintiff

Defendant

**COUNT ONE:** Plaintiff claims of defendant the sum of ~~seven~~ **Seven** hundred fifty dollars, for that, on June 27, 1963, in Baldwin County, Ala., on U S Highway 31, a public highway, at a point about 4 miles south of Bay Minette, defendant so negligently operated the vehicle he was then driving, that ~~he~~ the car of plaintiff's, which plaintiff was then driving, collided with another vehicle and turned over, and as a proximate consequence of said negligence the ~~car~~ plaintiffs said car, a 1957 Chevrolet V-8 two door sedan, of the value of \$750, was demolished and completely ruined and rendered valueless; all of which said damages were the proximate result of defendants said negligence, aforesaid.

John C. Walters  
 John C. Walters, Attorney (for plaintiff)

Address: Walters Building  
 Troy, Alabama

**TRIAL BY JURY DEMANDED.**

John C. Walters  
 Attorney.

**FILED**

JUL 19 1963

ALICE J. DUCK, CLERK  
 REGISTER

BALDWIN  
The State of Alabama, ~~Pike~~ Baldwin County  
CIRCUIT COURT

TO ANY SHERIFF OF THE STATE OF ALABAMA—GREETING:

You are hereby commanded to summon

BEN GARRIEK

~~Baldwin~~  
to appear in the Circuit Court of ~~Pike~~ Baldwin County, Alabama, at the place of holding the same and plead, answer, or demur,  
within thirty days from service hereof to the complaint of

FRANK KELLEY

Witness this 19 day of JULY 19 63

*Alice L. Duck*, Clerk

IF THE DEFENDANT FAILS TO APPEAR AND PLEAD, ANSWER OR DEMUR WITHIN THIRTY DAYS  
AFTER SERVICE, THE PLAINTIFF MAY TAKE JUDGMENT BY DEFAULT

COMPLAINT

FRANK KELLEY

vs.

BEN GARRIEK

no 5641

Plaintiff

Defendant

COUNT ONE: Plaintiff claims of defendant the sum of ~~\$650~~ Seven hundred fifty dollars, for that, on June 27, 1963, in Baldwin County, Ala., on U S Highway 31, a public highway, at a point about 4 miles south of Bay Minette, defendant so negligently operated the vehicle he was then driving, that ~~he~~ the car of plaintiff's, which plaintiff was then driving, collided with another vehicle and turned over, and as a proximate consequence of said negligence the ~~same~~ plaintiffs said car, a 1957 Chevrolet V-8 two door sedan, of the value of \$750, was demolished and completely ruined and rendered valueless; all of which said damages were the proximate result of defendants said negligence, aforesaid.

*John C. Walters*  
John C. Walters, Attorney (for plaintiff)

Address: Walters Building  
Troy, Alabama

TRIAL BY JURY DEMANDED.

*John C. Walters*  
Attorney.

FILED

JUL 19 1963

ALICE L. DUCK, CLERK  
REGISTER

N.F.

439

7285641

Frank Kelly vs

Ben Hurst

Returned 23 day of July 1963  
Not found in my county after diligent search and in-

quiry.

Taylor Williams, Sheriff  
By W. A. Zeller, Deputy Sheriff

Received this 19 day of July 1963, Sheriff

Executed this day of 19, 19

by leaving a copy of the within Summons and Complaint with

Defendant

Sheriff

Miles at 10¢ \$

THE STATE OF ALABAMA, PIKE COUNTY

To the Sheriff of County:

Whereas, the Plaintiff in the within stated cause has made affidavit and given bond as required by law, you are hereby required to take the property mentioned in the complaint into your possession, unless Defendant give bond payable to the Plaintiff, with sufficient surety in double the amount of the value of the property, with condition that if the Defendant

cost in the suit, within thirty days thereafter, deliver the property to the Plaintiff, and pay all costs and damages which may accrue from the detention thereof.

Clerk.

Troy Pkg. Co., Troy, Ala.