

5720

LUTHER ARD, as Administrator of the
ESTATE OF DELLA H. ARD, DECEASED

PLAINTIFF

VS

ALBERT W. BERGMAN, III

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

The Plaintiff, as Administrator of the Estate of Della H. Ard, deceased, claims of the Defendant Ten Thousand Dollars (\$10,000.00) as damages for that, heretofore, to-wit: the 25th day of December 1962, the Plaintiff's intestate, Della H. Ard, was riding as a passenger in a motor vehicle proceeding eastwardly on U. S. Highway 98 at a point four-fifths of a mile east of its intersection with Baldwin County Road #27, both public highways, in Baldwin County, Alabama, whereupon at the said point, the Defendant, Albert W. Bergman, III, so negligently operated a motor vehicle westwardly on U. S. Highway 98 so as to cause or allow said vehicle to collide with the said motor vehicle in which Plaintiff's intestate was riding as a passenger, and as a direct and proximate result of the negligence of the said Defendant, the said Della H. Ard suffered fatal injuries from which and as a proximate result of which she died on, to-wit: January 12, 1963, to the Plaintiff's damage, as aforesaid, hence this suit.


Attorney for Plaintiff

FILED

SEP 20 1963

ALICE I. DUCK, CLERK
REGISTER

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 Albert W. Bergman, III

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 _____

_____ Albert W. Bergman, III _____, Defendant _____

by Luther Ard, as Administrator of the Estate of Della H. Ard,
deceased

_____, Plaintiff _____

Witness my hand this 20 day of Sept 19 63

W. J. French _____, Clerk

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

Luther Ard, as Administrator
of the Estate of Della H. Ard,
deceased

Plaintiffs

vs.

Albert W. Bergman, III

Defendants

Summons and Complaint

Filed _____ 19____

SEP 20 1963

ALICE J. DUCK, CLERK
REGISTER

Clerk

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Foley, Alabama

Received In Office

_____, 19____

Sheriff.

I have executed this summons

this _____ 19____

by leaving a copy with

Sheriff.

Deputy Sheriff.

LUTHER ARD, as Administrator
of the estate of DELLA H.
ARD, Deceased,

Plaintiff,

vs.

ALBERT W. BERGMAN, III,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Comes the Defendant in the above styled cause and for plea
to the complaint filed in said cause, says:

1. Not guilty.

FILED

SEP 20 1965

ALICE J. DUCK, CLERK
REGISTER

Presman Stone
Attorneys for Defendant

LUTHER ARD, as Administrator
of the estate of DELLA H. ARD,
Deceased,

Plaintiff,

vs

ALBERT W. BERGMAN, III,

Defendant

* * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

* * * * *

PLEA

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