

STATE OF ALABAMA)
*
BALDWIN COUNTY)

5772

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Bobby D. Saint 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 James T. Powers, Jr.

WITNESS my hand this 14 day of October, 1963.

Alvin J. Duck
Clerk

Defendant's address is
300 North 2nd Avenue
Cullman, Alabama

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* * * * *

JAMES T. POWERS, JR.,
Plaintiff,
VS.
BOBBY D. SAINT,
Defendant.

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

C O M P L A I N T

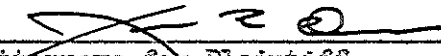
COUNT ONE

The plaintiff claims of the defendant TWENTY FIVE THOUSAND AND NO/100 DOLLARS (\$25,000.00) for that heretofore on to-wit, April 27, 1963, at a point on Alabama Highway No. 59, which is a public highway in Baldwin County, Alabama, 1.1 mile South of the city limits of Foley, Alabama, at the intersection of the said Alabama Highway No. 59 with the Milfen Road, the defendant so negligently operated an automobile so as to cause it to run into, upon or against the automobile which plaintiff was operating and as a proximate result of the negligence of said defendant the plaintiff was injured as follows: He was bruised, made sick, sore and nervous; was put under a great emotional strain; he was forced to spend 27 days in the hospital in and about the treatment of his said injuries and was caused to spend much money for hospital, medical and drug bills in and about the treatment of his injuries. Plaintiff avers that all of his injuries were caused as a proximate result of the negligence of the said defendant at said time and place, hence this suit.

COUNT TWO

The plaintiff claims of the defendant FIFTEEN HUNDRED DOLLARS (\$1500.00) for that heretofore on to-wit, April 27, ¹⁹⁶³ the defendant so negligently operated an automobile at a point on Alabama Highway No. 59, which is a public highway in Baldwin County, Alabama, 1.1 mile South of the city limits of Foley, Alabama, at the intersection of said Alabama Highway No. 59 with the Miflen Road so as to cause it to run into, upon or against the automobile of the plaintiff and as a proximate result thereof the plaintiff's automobile was completely demolished and rendered of no value, hence this suit.

O. S. BURKE and JAMES R. OWEN

By: 
Attorneys for Plaintiff

Plaintiff demands a trial by jury of said cause.


Attorney for Plaintiff

FILED

OCT 14 1963

ALICE J. DUCK, CLERK
REGISTER

JAMES R. OWEN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA 36507

June 17, 1965

Mrs. Alice J. Duck
Clerk of the Circuit Court
Bay Minette, Alabama


Dear Mrs. Duck:

I have a lawsuit pending in which J. T. Powers
is plaintiff and Bobby D. Saint is defendant. This case
was filed over one year ago and I do not believe there
has ever been any service. 5772

There is also a case pending in which Bobby D. Saint
is plaintiff and J. T. Powers is defendant. The
attorney representing Mr. Saint has agreed to dismiss his
case, if we would dismiss ours. f @ 0-

Accordingly, please dismiss both of these cases,
send me a cost bill in the case of Powers vs. Saint and
send a cost bill in the case of Saint vs. Powers to J.
Conner Owens, Attorney, Bay Minette, Alabama. 6031

Yours very truly,


JAMES R. OWEN

JRO/ers

STATE OF ALABAMA)
*
BALDWIN COUNTY)

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WITNESS my hand this 14 day of October, 1963.

Oliver J. Smith
Clerk

Defendant's address is
300 North 2nd Avenue
Cullman, Alabama

* * * * *

JAMES T. POWERS, JR.,)	
)	
Plaintiff,)	IN THE CIRCUIT COURT OF
)	
VS.)	BALDWIN COUNTY, ALABAMA
)	
BOBBY D. SAINT,)	AT LAW
)	5772
Defendant.)	

C O M P L A I N T
COUNT ONE

The plaintiff claims of the defendant TWENTY FIVE THOUSAND AND NO/100 DOLLARS (\$25,000.00) for that heretofore on to-wit, April 27, 1963, at a point on Alabama Highway No. 59, which is a public highway in Baldwin County, Alabama, 1.1 mile South of the city limits of Foley, Alabama, at the intersection of the said Alabama Highway No. 59 with the Mifflen Road, the defendant so negligently operated an automobile so as to cause it to run into, upon or against the automobile which plaintiff was operating and as a proximate result of the negligence of said defendant the plaintiff was injured as follows: He was bruised, made sick, sore and nervous; was put under a great emotional strain; he was forced to spend 27 days in the hospital in and about the treatment of his said injuries and was caused to spend much money for hospital, medical and drug bills in and about the treatment of his injuries. Plaintiff avers that all of his injuries were caused as a proximate result of the negligence of the said defendant at said time and place, hence this suit.

COUNT TWO

The plaintiff claims of the defendant FIFTEEN HUNDRED DOLLARS (\$1500.00) 1963 for that heretofore on to-wit, April 27, the defendant so negligently operated an automobile at a point on Alabama Highway No. 59, which is a public highway in Baldwin County, Alabama, 1.1 mile South of the city limits of Foley, Alabama, at the intersection of said Alabama Highway No. 59 with the Mifflen Road so as to cause it to run into, upon or against the automobile of the plaintiff and as a proximate result thereof the plaintiff's automobile was completely demolished and rendered of no value, hence this suit.

O. S. BURKE and JAMES R. OWEN

By: [Signature]
Attorneys for Plaintiff

Plaintiff demands a trial by jury of said cause.

[Signature]
Attorney for Plaintiff

FILED

OCT 24 1963

ALICE J. DUCK, CLERK
REGISTER