

JAMES A. BRICE

ATTORNEY AT LAW

BOX 296 • FOLEY, ALABAMA • WH3-3601

MESSAGE

REPLY

TO Mrs. Alice J. Duck
Circuit Clerk
Bay Minette, Alabama

DATE October 28, 1963

re: Mary Jones
vs: Charlie Thomas

Enclosure: Summons and Complaint

DATE

SIGNED

BY

RECIPIENT KEEP THIS COPY, RETURN WHITE COPY TO SENDER

700.5792

MARY JONES,

PLAINTIFF

VS

CHARLIE THOMAS

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW, NO. 5792

COMPLAINT

Plaintiff claims of the Defendant Five Thousand Dollars (\$5,000.00) as damages, for that heretofore on, to-wit: the 23rd day of June 1963, the Defendant, Charlie Thomas, so negligently operated a motor vehicle in which Plaintiff was riding as a passenger southwardly on Baldwin County Road #55 at its intersection with U. S. Highway 98; both being public highways, in Baldwin County, Alabama, so as to cause or allow said vehicle to go out of control and to leave said road and crash, and as a direct and proximate result of the negligence of the Defendant, the Plaintiff received contusions and abrasions about her body; both her legs were broken; she was made sick, sore, weak and weary; suffered great pain and mental anguish; was caused to incur expenses of doctors, hospitals, nurses, x-rays and drugs in and about the care and treatment of her injuries as aforesaid; and suffered loss of income due to her disability, hence this suit.

FILED

SEP 23 1963

AMT & CLK

CLERK
REGISTER


Attorney for Plaintiff

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 Charlie Thomas

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 -----

Charlie Thomas-----, Defendant-----

by -----

Mary Jones-----, Plaintiff-----

Witness my hand this 29 day of Oct 1963

Exp- 11-2-63 Alice J. Luck-----, Clerk

No. 5792

Page _____

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

Mary Jones

Plaintiffs

vs.

Charlie Thomas

Defendants

Summons and Complaint

Filed _____ 19____

FILED

OCT 20 1963

Clerk

**ALICE J. DUCK, CLERK
REGISTER**

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Gulf Coast Foundary
Foley, Alabama

Received In Office

Oct 29, 1963

Sheriff.

I have executed this summons

this Nov-2 1963

by leaving a copy with

Charlie Thomas

Sheriff claims 72 miles at

Ten Cents per mile Total \$ 7.20

TAYLOR WILKINS, Sheriff

BY Charles Chedden
DEPUTY SHERIFF

Sheriff.

Deputy Sheriff.