STATE OF ALABAMA BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Dicen Flowers and Clifford Flowers 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 Madie Moore.

WITNESS MY HAND, this \_25 day of April, 1963.

Clerk Clerk

The defendant's address if Route 2, Box 151, Bay Minette, Alabama.

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MADIE MOORE.

Plaintiff.

VS.

DICEN FLOWERS and CLIFFORD FLOWERS,

Defendants.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

> AT LAW\_ 555

## COMPLAINT

The plaintiff claims of the defendants Three Hundred Fifty Dollars (\$350.00) for that heretofore on to-wit: July 20, 1962, at a point on the Brady Road Extention, which is 2.9 miles east of the city limits of Bay Minette in Baldwin County, Alabama, the defendant, Clifford Flowers, who was then and there an agent, servant or employee of the defendant, Dicen Flowers, acting within the line and scope of his authority as such agent, servant or employee, so negligently operated a motor vehicle so as to cause it to run into, upon or against an automobile belonging to the plaintiff and as a proximate result thereof the said plaintiff's automobile was

damaged as follows: the front bumper was bent and broken; the left front fender was bent and broken; the front grill was damaged and bent and the hood of the said automobile was bent, broken and damaged, all to the plaintiff's damages aforesaid, hence this suit. Plaintiff avers that all of her damages were caused as a proximate result of the negligence of the defendant, Clifford Flowers, who was at said time and place an agent, servant or employee of the defendant, Dicen Flowers, acting within the line and scope of his authority as such agent, servant or employee.

EN-4-26-63

Attorney for Plaintiff

FILED

APR 25 1965

ALIGE L DIEN, CLERK REGISTER

I served a copy of the within & + C Madie Moore on Dien + Chyford Houses By service on\_ TAYLOR WILKINS Sheriff Dicen Flowers 4 Clippord Flowers 5 Miles Mark Defts. -20 Ten Cents per file Total & 3.000 TAYLOR WILKINS, Sheriff APR 25 1800 AUG L DUCK, REGISTER

James R. Owen