

5561

STATE OF ALABAMA)
 *
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon JAMES DAVISON and EVERT DAVISON 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 D. E. TOLBERT.

WITNESS my hand this 3rd day of May, 1963.

Alice J. Luck
Clerk of the Circuit Court

The defendants reside in
Bay Minette, Alabama.

Ed-5-10-63

D. E. TOLBERT,

VS.

Plaintiff,

JAMES DAVISON and
EVERT DAVISON,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 5561

COMPLAINT

COUNT I

The plaintiff claims of the defendants the sum of Five Hundred Dollars (\$500.00) damages for that heretofore on, to-wit, May 6, 1962, the defendant Evert Davison, the agent, servant or employee of the defendant James Davison, while acting within the line and scope of his authority as such agent, servant or employee, did so negligently operate a motor vehicle on a public highway in Baldwin County, Alabama, as to cause or allow the said motor vehicle to run into, upon or against plaintiff's automobile, and as a proximate result of the said negligence of the said defendant the front end of plaintiff's automobile was damaged, the front bumper, front fenders, radiator, hood and other parts of the front of the said automobile were bent and damaged, all as a proximate consequence of the negligence of the defendants as aforesaid, hence this suit.

COUNT II

The plaintiff claims of the defendant, Evert Davison, the sum of Five Hundred Dollars (\$500.00) as damages for that heretofore on, to-wit, May 6, 1962, the said defendant so negligently operated a motor vehicle which he was then and there driving on a public highway in Baldwin County, Alabama, as to cause the said motor vehicle to run into, upon or against the plaintiff's automobile, and as a proximate consequence of which the front end of the plaintiff's automobile was damaged, the front bumper, front fenders, radiator, hood and other parts of the front of the said automobile were bent and damaged, all as a proximate consequence of the negligence of the defendant as aforesaid, hence this suit.

FILED

MAY

8 1963

WIDE I. DICK, CLERK
REGISTER

J. B. Blackburn
Attorney for Plaintiff

Plaintiff demands a trial of
said cause by jury.

J. B. Blackburn

Attorney for Plaintiff

FILED

MAY 3 1963

ALICE J. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

D. E. TOLBERT,

Plaintiff,

VS.

JAMES DAVISON and EVERT DAVISON,

Defendants.

TAYLOR WILKINS, Sheriff

By W. A. Tolbert, S.

om

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

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FILED

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ALICE L. DUCK, CLERK
REGISTER

J. B. Blackburn