

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon JAMES B. WASHINGTON and DOUGLAS MORGAN 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 same, then and there to answer the complaint of DELIA R. FRICK.

WITNESS my hand this 2 day of June, 1963.

Alice J. Shuck
Clerk of the Circuit Court

The defendant, James B. Washington, resides at Star Route C, Box 508, Atmore, Alabama.

The defendant Douglas Morgan resides at Bratt, Florida.

* * * * *

DELIA R. FRICK,

Plaintiff,

VS.

JAMES B. WASHINGTON and
DOUGLAS MORGAN,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 5597

COMPLAINT

COUNT ONE

The plaintiff claims of the defendants the sum of Ten Thousand Dollars (\$10,000.00) as damages for that heretofore on. to-wit, June 3, 1962, the defendant, James B. Washington, who was then and there the agent, servant or employee of the defendant, Douglas Morgan, and acting in the line and scope of his authority as such agent, servant or employee, then and there so negligently

operated the motor truck which he was then and there driving at a point on U. S. Highway No. 31 near Shiver's Garage at Spanish Fort in Baldwin County, Alabama, as to cause the said motor truck to run into, upon or against the motor vehicle which the plaintiff was driving, and as a proximate result of the said negligence of the said defendant the plaintiff's neck was injured, she was caused to lose time from her work and to expend large sums of money for medical treatment because of the said injuries, hence this suit.

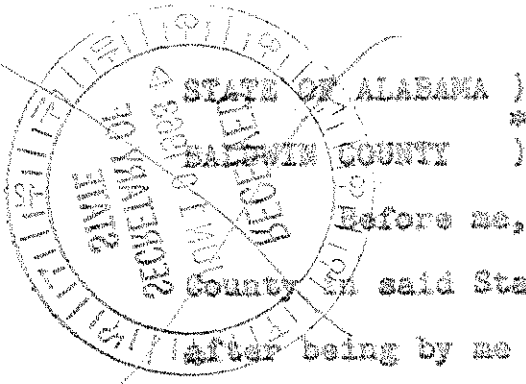
COUNT TWO

The plaintiff claims of the defendants the sum of Five Hundred Dollars (\$500.00) as damages for that heretofore on, to-wit, June 8, 1962, the defendant, James D. Washington, who was then and there the agent, servant or employee of the defendant, Douglas Morgan, and acting in the line and scope of his authority as such agent, servant or employee, then and there so negligently operated the motor truck which he was then and there driving at a point on U. S. Highway No. 31 near Shiver's Garage at Spanish Fort in Baldwin County, Alabama, as to cause the said motor truck to run into, upon or against the plaintiff's motor vehicle which she was then and there driving, and as a proximate result and consequence of the negligence of the said defendant the plaintiff's said motor vehicle was demolished and rendered unfit for use, hence this suit.


Attorney for Plaintiff

Plaintiff demands a trial of
this cause by jury.


Attorney for Plaintiff



STATE OF ALABAMA)
BALDWIN COUNTY)

Before me, the undersigned authority, within and for said County in said State, personally appeared J. B. Blackburn, who, after being by me first duly and legally sworn, deposes and says:

That he is attorney for the plaintiff in the above entitled cause in which Delia E. Price is plaintiff and James D. Washington and Douglas Morgan are defendants; that on, to-wit, June 8, 1962, the defendants were each non-residents of the State of Alabama.

Affiant further deposes and says that service can be had on the defendant, James D. Washington, at Star Route C, Box 508, Atmore, Alabama, and on the defendant, Douglas Morgan, at Bratt, Florida.

J. B. Blackburn

Sworn to and subscribed before me on
this the 7th day of June, 1963.

Ernestine R. Sims

Notary Public, Baldwin County, Alabama

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon JAMES D. WASHINGTON and DOUGLAS MORGAN 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 same, then and there to answer the complaint of DELIA R. PRICE.

WITNESS my hand this 7 day of June, 1963.

Alice J. Luck
Clerk of the Circuit Court

The defendant, James D. Washington,
resides at Star Route C, Box 508,
Atmore, Alabama.

The defendant Douglas Morgan re-
sides at Bratt, Florida.

* * * * *

DELIA R. PRICE,

Plaintiff,

VS.

JAMES D. WASHINGTON and
DOUGLAS MORGAN,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 5597

COMPLAINT

COUNT ONE

The plaintiff claims of the defendants the sum of Ten Thousand Dollars (\$10,000.00) as damages for that heretofore on, to-wit, June 8, 1962, the defendant, James D. Washington, who was then and there the agent, servant or employee of the defendant, Douglas Morgan, and acting in the line and scope of his authority as such agent, servant or employee, then and there so negligently

operated the motor truck which he was then and there driving at a point on U. S. Highway No. 31 near Shiver's Garage at Spanish Fort in Baldwin County, Alabama, as to cause the said motor truck to run into, upon or against the motor vehicle which the plaintiff was driving, and as a proximate result of the said negligence of the said defendant the plaintiff's neck was injured, she was caused to lose time from her work and to expend large sums of money for medical treatment because of the said injuries, hence this suit.

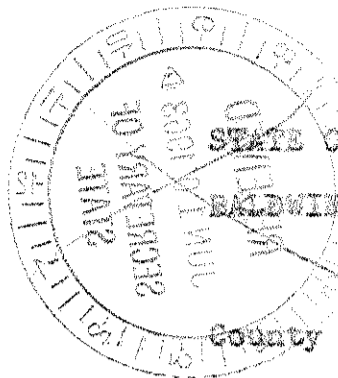
COUNT TWO

The plaintiff claims of the defendants the sum of Five Hundred Dollars (\$500.00) as damages for that heretofore on, to-wit, June 8, 1962, the defendant, James D. Washington, who was then and there the agent, servant or employee of the defendant, Douglas Morgan, and acting in the line and scope of his authority as such agent, servant or employee, then and there so negligently operated the motor truck which he was then and there driving at a point on U. S. Highway No. 31 near Shiver's Garage at Spanish Fort in Baldwin County, Alabama, as to cause the said motor truck to run into, upon or against the plaintiff's motor vehicle which she was then and there driving, and as a proximate result and consequence of the negligence of the said defendant the plaintiff's said motor vehicle was demolished and rendered unfit for use, hence this suit.


Attorney for Plaintiff

Plaintiff demands a trial of
this cause by jury.


Attorney for Plaintiff



STATE OF ALABAMA)
*
BALDWIN COUNTY)

Before me, the undersigned authority, within and for said County in said State, personally appeared J. B. Blackburn, who, after being by me first duly and legally sworn, deposes and says:

That he is attorney for the plaintiff in the above entitled cause in which Delia R. Price is plaintiff and James D. Washington and Douglas Morgan are defendants; that on, to-wit, June 8, 1962, the defendants were each non-residents of the State of Alabama.

Affiant further deposes and says that service can be had on the defendant, James D. Washington, at Star Route C, Box 508, Atmore, Alabama, and on the defendant, Douglas Morgan, at Bratt, Florida.

J. B. Blackburn

Sworn to and subscribed before me on
this the 7th day of June, 1963.

Ernestine R. Lewis

Notary Public, Baldwin County, Alabama

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon JAMES D. WASHINGTON and DOUGLAS MORGAN 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 same, then and there to answer the complaint of DELIA R. PRICE.

WITNESS my hand this 7 day of June, 1963.

Alice J. Luck
Clerk of the Circuit Court

The defendant, James D. Washington, resides at Star Route C, Box 508, Atmore, Alabama.

The defendant Douglas Morgan resides at Bratt, Florida.

* * * * *

DELIA R. PRICE,

Plaintiff,

VS.

JAMES D. WASHINGTON and
DOUGLAS MORGAN,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW NO. 5597

COMPLAINT

COUNT ONE

The plaintiff claims of the defendants the sum of Ten Thousand Dollars (\$10,000.00) as damages for that heretofore on, to-wit, June 8, 1962, the defendant, James D. Washington, who was then and there the agent, servant or employee of the defendant, Douglas Morgan, and acting in the line and scope of his authority as such agent, servant or employee, then and there so negligently

operated the motor truck which he was then and there driving at a point on U. S. Highway No. 31 near Shiver's Garage at Spanish Fort in Baldwin County, Alabama, as to cause the said motor truck to run into, upon or against the motor vehicle which the plaintiff was driving, and as a proximate result of the said negligence of the said defendant the plaintiff's neck was injured, she was caused to lose time from her work and to expend large sums of money for medical treatment because of the said injuries, hence this suit.

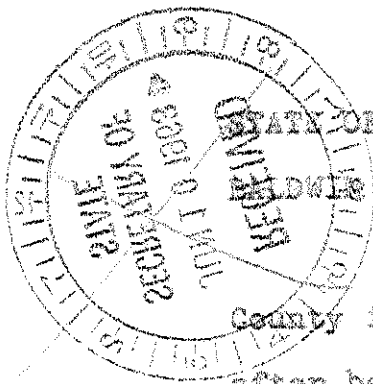
COUNT TWO

The plaintiff claims of the defendants the sum of Five Hundred Dollars (\$500.00) as damages for that heretofore on, to-wit, June 8, 1962, the defendant, James D. Washington, who was then and there the agent, servant or employee of the defendant, Douglas Morgan, and acting in the line and scope of his authority as such agent, servant or employee, then and there so negligently operated the motor truck which he was then and there driving at a point on U. S. Highway No. 31 near Shiver's Garage at Spanish Fort in Baldwin County, Alabama, as to cause the said motor truck to run into, upon or against the plaintiff's motor vehicle which she was then and there driving, and as a proximate result and consequence of the negligence of the said defendant the plaintiff's said motor vehicle was demolished and rendered unfit for use, hence this suit.


Attorney for Plaintiff

Plaintiff demands a trial of
this cause by jury.


Attorney for Plaintiff



STATE OF ALABAMA)
*
BALDWIN COUNTY)

Before me, the undersigned authority, within and for said County in said State, personally appeared J. E. Blackburn, who, after being by me first duly and legally sworn, deposes and says:

That he is attorney for the plaintiff in the above entitled cause in which Delia R. Price is plaintiff and James D. Washington and Douglas Morgan are defendants; that on, to-wit, June 8, 1962, the defendants were each non-residents of the State of Alabama.

Affiant further deposes and says that service can be had on the defendant, James D. Washington, at Star Route C, Box 506, Atmore, Alabama, and on the defendant, Douglas Morgan, at Bratt, Florida.

J. E. Blackburn

Sworn to and subscribed before me on
this the 7th day of June, 1963.

Ernestine R. Sim

Notary Public, Baldwin County, Alabama

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon JAMES D. WASHINGTON and DOUGLAS MORGAN 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 same, then and there to answer the complaint of DELIA R. PRICE.

WITNESS my hand this 7 day of June, 1963.

Alice J. Clark

Clerk of the Circuit Court

The defendant, James D. Washington, resides at Star Route C, Box 508, Atmore, Alabama.

The defendant Douglas Morgan resides at Bratt, Florida.

* * * * *

DELIA R. PRICE,

Plaintiff,

VS.

JAMES D. WASHINGTON and
DOUGLAS MORGAN,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 5597

COMPLAINT

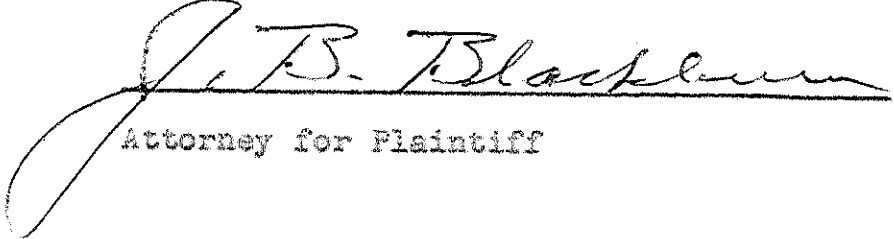
COUNT ONE

The plaintiff claims of the defendants the sum of Ten Thousand Dollars (\$10,000.00) as damages for that heretofore or, to-wit, June 8, 1962, the defendant, James D. Washington, who was then and there the agent, servant or employee of the defendant, Douglas Morgan, and acting in the line and scope of his authority as such agent, servant or employee, then and there so negligently

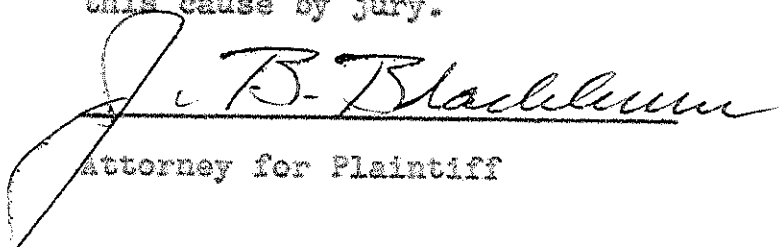
operated the motor truck which he was then and there driving at a point on U. S. Highway No. 31 near Shiver's Garage at Spanish Fort in Baldwin County, Alabama, as to cause the said motor truck to run into, upon or against the motor vehicle which the plaintiff was driving, and as a proximate result of the said negligence of the said defendant the plaintiff's neck was injured, she was caused to lose time from her work and to expend large sums of money for medical treatment because of the said injuries, hence this suit.

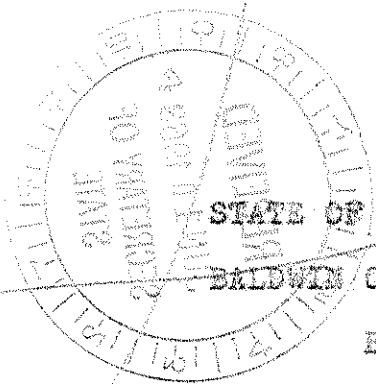
COUNT TWO

The plaintiff claims of the defendants the sum of Five Hundred Dollars (\$500.00) as damages for that heretofore on, to-wit, June 8, 1962, the defendant, James D. Washington, who was then and there the agent, servant or employee of the defendant, Douglas Morgan, and acting in the line and scope of his authority as such agent, servant or employee, then and there so negligently operated the motor truck which he was then and there driving at a point on U. S. Highway No. 31 near Shiver's Garage at Spanish Fort in Baldwin County, Alabama, as to cause the said motor truck to run into, upon or against the plaintiff's motor vehicle which she was then and there driving, and as a proximate result and consequence of the negligence of the said defendant the plaintiff's said motor vehicle was demolished and rendered unfit for use, hence this suit.


Attorney for Plaintiff

Plaintiff demands a trial of
this cause by jury.


Attorney for Plaintiff



STATE OF ALABAMA)
*
BALDWIN COUNTY)

Before me, the undersigned authority, within and for said County in said State, personally appeared J. B. Blackburn, who, after being by me first duly and legally sworn, deposes and says:

That he is attorney for the plaintiff in the above entitled cause in which Delia R. Price is plaintiff and James D. Washington and Douglas Morgan are defendants; that on, to-wit, June 8, 1962, the defendants were each non-residents of the State of Alabama.

Affiant further deposes and says that service can be had on the defendant, James D. Washington, at Star Route C, Box 508, Atmore, Alabama, and on the defendant, Douglas Morgan, at Bratt, Florida.

J. B. Blackburn

Sworn to and subscribed before me on this the 7th day of June, 1963.

Ernestine R. Davis

Notary Public, Baldwin County, Alabama

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon JAMES D. WASHINGTON and DOUGLAS MORGAN 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 same, then and there to answer the complaint of DELIA R. PRICE.

WITNESS my hand this 7 day of June, 1963.

Alice J. Luck

Clerk of the Circuit Court

The defendant, James D. Washington, resides at Star Route C, Box 508, Atmore, Alabama.

The defendant Douglas Morgan resides at Bratt, Florida.

* * * * *

DELIA R. PRICE,

Plaintiff,

VS.

JAMES D. WASHINGTON and
DOUGLAS MORGAN,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 5597

COMPLAINT

COUNT ONE

The plaintiff claims of the defendants the sum of Ten Thousand Dollars (\$10,000.00) as damages for that heretofore on, to-wit, June 8, 1962, the defendant, James D. Washington, who was then and there the agent, servant or employee of the defendant, Douglas Morgan, and acting in the line and scope of his authority as such agent, servant or employee, then and there so negligently

operated the motor truck which he was then and there driving at a point on U. S. Highway No. 31 near Shiver's Garage at Spanish Fort in Baldwin County, Alabama, as to cause the said motor truck to run into, upon or against the motor vehicle which the plaintiff was driving, and as a proximate result of the said negligence of the said defendant the plaintiff's neck was injured, she was caused to lose time from her work and to expend large sums of money for medical treatment because of the said injuries, hence this suit.

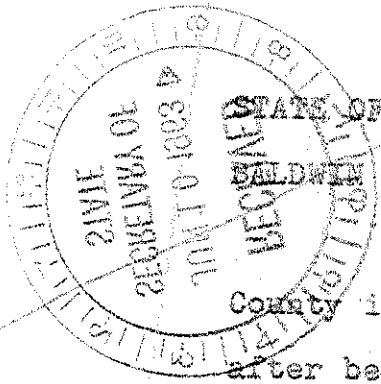
COUNT TWO

The plaintiff claims of the defendants the sum of Five Hundred Dollars (\$500.00) as damages for that heretofore on, to-wit, June 8, 1962, the defendant, James D. Washington, who was then and there the agent, servant or employee of the defendant, Douglas Morgan, and acting in the line and scope of his authority as such agent, servant or employee, then and there so negligently operated the motor truck which he was then and there driving at a point on U. S. Highway No. 31 near Shiver's Garage at Spanish Fort in Baldwin County, Alabama, as to cause the said motor truck to run into, upon or against the plaintiff's motor vehicle which she was then and there driving, and as a proximate result and consequence of the negligence of the said defendant the plaintiff's said motor vehicle was demolished and rendered unfit for use, hence this suit.


Attorney for Plaintiff

Plaintiff demands a trial of
this cause by jury.


Attorney for Plaintiff



STATE OF ALABAMA)
*
BALDWIN COUNTY)

Before me, the undersigned authority, within and for said County in said State, personally appeared J. B. Blackburn, who, after being by me first duly and legally sworn, deposes and says:

That he is attorney for the plaintiff in the above entitled cause in which Delia R. Price is plaintiff and James D. Washington and Douglas Morgan are defendants; that on, to-wit, June 8, 1962, the defendants were each non-residents of the State of Alabama.

Affiant further deposes and says that service can be had on the defendant, James D. Washington, at Star Route C, Box 508, Atmore, Alabama, and on the defendant, Douglas Morgan, at Bratt, Florida.

J. B. Blackburn

Sworn to and subscribed before me on
this the 7th day of June, 1963.

Ernestine R. Sims

Notary Public, Baldwin County, Alabama

STATE OF ALABAMA)
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BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon JAMES D. WASHINGTON and DOUGLAS MORGAN 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 same, then and there to answer the complaint of DELIA R. PRICE.

WITNESS my hand this 7 day of June, 1963.

Alice J. Duck
Clerk of the Circuit Court

The defendant, James D. Washington, resides at Star Route C, Box 508, Atmore, Alabama.

The defendant Douglas Morgan resides at Bratt, Florida.

* * * * *

DELIA R. PRICE,

VS.

JAMES D. WASHINGTON and
DOUGLAS MORGAN,

Plaintiff,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 5597

COMPLAINT

COUNT ONE

The plaintiff claims of the defendants the sum of Ten Thousand Dollars (\$10,000.00) as damages for that heretofore on, to-wit, June 8, 1962, the defendant, James D. Washington, who was then and there the agent, servant or employee of the defendant, Douglas Morgan, and acting in the line and scope of his authority as such agent, servant or employee, then and there so negligently

operated the motor truck which he was then and there driving at a point on U. S. Highway No. 31 near Shiver's Garage at Spanish Fort in Baldwin County, Alabama, as to cause the said motor truck to run into, upon or against the motor vehicle which the plaintiff was driving, and as a proximate result of the said negligence of the said defendant the plaintiff's neck was injured, she was caused to lose time from her work and to expend large sums of money for medical treatment because of the said injuries, hence this suit.

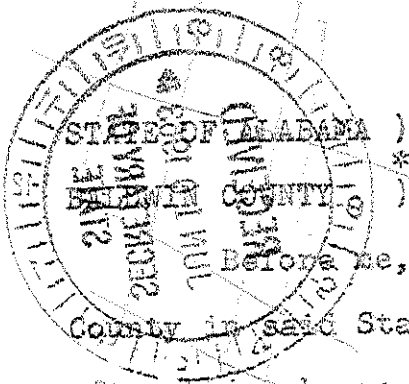
COUNT TWO

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Attorney for Plaintiff

Plaintiff demands a trial of
this cause by jury.


Attorney for Plaintiff



Before me, the undersigned authority, within and for said County in said State, personally appeared J. E. Blackburn, who, after being by me first duly and legally sworn, deposes and says:

That he is attorney for the plaintiff in the above entitled cause in which Delia R. Price is plaintiff and James D. Washington and Douglas Morgan are defendants; that on, to-wit, June 8, 1962, the defendants were each non-residents of the State of Alabama.

Affiant further deposes and says that service can be had on the defendant, James D. Washington, at Star Route C, Box 506, Atmore, Alabama, and on the defendant, Douglas Morgan, at Bratt, Florida.

J. E. Blackburn

Sworn to and subscribed before me on this the 7th day of June, 1963.

Ernestine R. Sims

Notary Public, Baldwin County, Alabama

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon JAMES D. WASHINGTON and DOUGLAS MORGAN 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 same, then and there to answer the complaint of DELIA R. PRICE.

WITNESS my hand this 7 day of June, 1963.

Alice D. Duck
Clerk of the Circuit Court

The defendant, James D. Washington, resides at Star Route C, Box 508, Atmore, Alabama.

The defendant Douglas Morgan resides at Bratt, Florida.

* * * * *

DELIA R. PRICE,)
)
Plaintiff,)
VS.)
)
JAMES D. WASHINGTON and)
DOUGLAS MORGAN,)
)
Defendants.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW NO. 5597

COMPLAINT
COUNT ONE

The plaintiff claims of the defendants the sum of Ten Thousand Dollars (\$10,000.00) as damages for that heretofore on, to-wit, June 8, 1962, the defendant, James D. Washington, who was then and there the agent, servant or employee of the defendant, Douglas Morgan, and acting in the line and scope of his authority as such agent, servant or employee, then and there so negligently

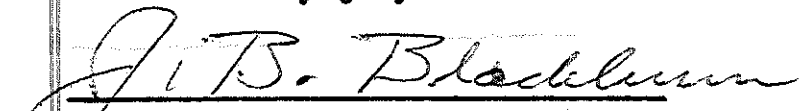
operated the motor truck which he was then and there driving at a point on U. S. Highway No. 31 near Shiver's Garage at Spanish Fort in Baldwin County, Alabama, as to cause the said motor truck to run into, upon or against the motor vehicle which the plaintiff was driving, and as a proximate result of the said negligence of the said defendant the plaintiff's neck was injured, she was caused to lose time from her work and to expend large sums of money for medical treatment because of the said injuries, hence this suit.

COUNT TWO

The plaintiff claims of the defendants the sum of Five Hundred Dollars (\$500.00) as damages for that heretofore on, to-wit, June 8, 1962, the defendant, James D. Washington, who was then and there the agent, servant or employee of the defendant, Douglas Morgan, and acting in the line and scope of his authority as such agent, servant or employee, then and there so negligently operated the motor truck which he was then and there driving at a point on U. S. Highway No. 31 near Shiver's Garage at Spanish Fort in Baldwin County, Alabama, as to cause the said motor truck to run into, upon or against the plaintiff's motor vehicle which she was then and there driving, and as a proximate result and consequence of the negligence of the said defendant the plaintiff's said motor vehicle was demolished and rendered unfit for use, hence this suit.


Attorney for Plaintiff

Plaintiff demands a trial of
this cause by jury.

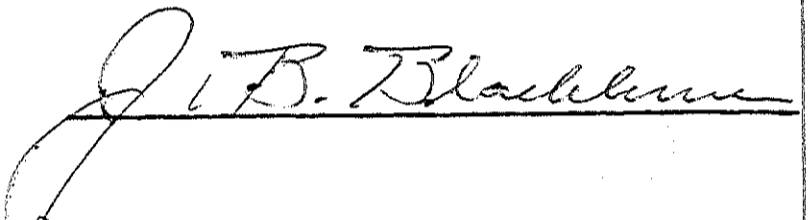

Attorney for Plaintiff

STATE OF ALABAMA)
*
BALDWIN COUNTY)

Before me, the undersigned authority, within and for said County in said State, personally appeared J. B. Blackburn, who, after being by me first duly and legally sworn, deposes and says:

That he is attorney for the plaintiff in the above entitled cause in which Delia R. Price is plaintiff and James D. Washington and Douglas Morgan are defendants; that on, to-wit, June 8, 1962, the defendants were each non-residents of the State of Alabama.

Affiant further deposes and says that service can be had on the defendant, James D. Washington, at Star Route C, Box 508, Atmore, Alabama, and on the defendant, Douglas Morgan, at Bratt, Florida.



Sworn to and subscribed before me on
this the 7th day of June, 1963.



Notary Public, Baldwin County, Alabama

*Ex-6-10-63 on
Sec. of State*

1078

RECEIVED IN OFFICE

JUN 10 1963

M. S. BUTLER, Sheriff

Executed by serving 6 copies of
the within on Agnes Baggett
Secretary of State of The State of
Alabama.

This the 10 day of June 19 63

Sheriff of Montgomery County,

M. S. Butler,

By J. B. Blackburn D. S.

The Sheriff claims 2
miles at 10c per mile for a total
of \$.20

M. S. Butler, Sheriff
Montgomery County, Ala.

SUMMONS AND COMPLAINT

DELIA R. PRICE,

Plaintiff,

VS.

JAMES D. WASHINGTON and DOUGLAS
MORGAN,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW NO. 5597

J. B. BLACKBURN
ATTORNEY AT LAW
BAY MINETTE, ALABAMA