STATE OF ALABAMA ! BALDWIN COUNTY

TO ANY SERVIFF OF THE STATE OF ALABAMA:

You are horeby commended to susmon JANNE D. WASHINGTON and DOUGLAS MURGAS 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 enswer the complaint of DELLA R. FEICH.

WITHOUS my hand this day of June, 1963.

Clerk of the Circuit Court

The defendant, James D. Washington, resides at Star Apute C, Box 555, Atmore, Alabama.

The defendant loughed Morgan resides at Bratt, Florida.

DELIA R. PRICE,

Plainsiff.

VO.

JAMES D. WASHINGTON and DOUGLAS MORGAN,

Defendants.

IN THE CLEASURE COURT OF

BALDWIN COUNTY.

AT LAW

COMPLAINT

CALL LAND

The plaintiff claims of the defendants the sws of Ten Thousand Dollars (\$10,000.00) as demages for that heretofore oc. 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 es such agent, servant or employee, then and there so negligently

court Ind

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 Carage 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 Flaintiff

- Harlelinen

Plaintiff demands a trial of this cause by jury.

Slackleuren

Actorney for Plaintiff

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Edfore me, the undersigned authority, within and for said 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 Bougles Morgen are defendants; that on, to-wit, June 8, 1962, the defendants were each non-residents of the State of Alabama.

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

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

STATE OF ALABAMA)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon JAMIS 3. VASHINGTON 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 enswer the complaint of BELIA R. PRICE.

SITHESS my hand this _____ day of June, 1963.

Clerk of the Circuit Court

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

The defendent Booglas Morgan resides at Bratt, Florida.

DELLA R. FRICE,

Plaintiff,

VD.

JAMES D. WASHINGTON and DOUGLAS NORGAN,

Defendents.

IN THE CLACUIT COURT OF BALDKIN COUNTY, ALABAMA RT LAW NO. 352

COMPLAINT

COUNT OF

The plaintiff claims of the defendants the sum of Ten Thousand Dollars (\$10,000.00) as damages for that heretofore on, te-wit, June 5, 1962, the defendant, James D. Hashington, who was then and there the agent, servent 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

commitwo

The plaintiff claims of the defendants the sum of Five Hundred Bollars (\$500.00) as demages for that heretofore on, to-wit, June 8, 1962, the defendant, James B. Washington, who was then and there the agent, servant or employee of the defendant, Bouglas 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.

Actorney for Flaintiff

Hackberry

Plaintiff demands a trial of this cause by jury.

atorney for Plaintiff



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 Belia R. Price is plaintiff and James D. Washington and Bouglas 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.

3. Blackburn

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

Enestine R. Sens

STATE OF ALABAMA) BALDWIN COUNTY

The second

TO REI SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon JAMAS D. WASHINGTON and DOUGLAS MONGAR to appear I within thirty days from the cartice 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 D. FRICE.

WITHESS my hand this ____ day of June, 1963.

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 N. PRICE,

Plaintiff,

VS.

JAMES D. WASHINGTON and DOUGLAS MORGAN,

Defendants.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

AT LAW NO. 55

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

COURT 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 B. Washington, who was then and there the agent, servant or employee of the defendant, Bouglas 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 Flaintiff

Hackbeurn

)- / Jlackleum

Plaintiff demands a trial of this cause by jury.

Coorney for Plaintiff



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 Bouglas 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.

B. Blockbury

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

and Lai.

STATE OF ALABAMA) DALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are horeby commanded to summon JAMES E. MASHIMUTON and DOWLAS MOROAN 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 _____ day of June, 1963.

Clork 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,

Plainciff,

VS.

JAMES D. WASHIKUTOW and DOUGLAS MORGAN,

Defendants.

IN THE CINCULT COURT OF BALDWIN COUNTY, ALABAMA

AT LAW

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 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

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 Flaintiff

5. Blackleum

Plaintiff demands a trial of

lacleleum

this cause by jury.

attorney for Plaintiff

STATE OF ALABAMA)

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 B. 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.

15. Blacklenen

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

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 ______ day of June, 1963.

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. <u>3597</u>

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

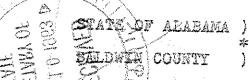
COUNT TWO

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.

Slacklemm

attorney for Plaintiff



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. Blacklin

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

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 _____ day of June, 1963.

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. 5397

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

COUNT TWO

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

Blacklenn

Plaintiff demands a trial of this cause by jury.

ttorney for Plaintiff



County in save State, personally appeared J. B. Flackburn, 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 Bouglas 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.

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

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 _____ day of June, 1963.

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

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

Stacken

Plaintiff demands a trial of this cause by jury.

415. Blacklum

ttorney 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.

B. Blacklun

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

Notary Public, Baldwin County, Alabama

Ey- 6-10-63 on See of State RECEIVED IN OFFICE

JUN 10 1983

M. S. BUTLER, Sheriff

Executed by serving. C. copies of the within on Secretary of State of The State of Alabama.

This the Cday of Secretary of State of State

Sheriff of Montgomery County,

M. S. Butler,

Ву 96 ветею D. S.

SUMMONS AND COMPLAINT

DELIA R. PRICE,

VS.

Plaintiff,

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