

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Jack Herbert and Otto May 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 Amos C. Wagner.

WITNESS my hand, this 20 day of June, 1963.

Beirne J. Duck
Clerk

The Defendants' address is
Route 1, Box 90, Wing, Alabama
Covington County

* * * * *

AMOS C. WAGNER,

Plaintiff,

VS.

JACK HERBERT and OTTO MAY,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

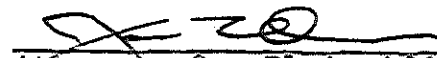
700,5609

C O M P L A I N T

COUNT ONE

The Plaintiff claims of the Defendants the sum of TWO HUNDRED FIFTY DOLLARS (\$250.00) for that heretofore on to-wit, October 16, 1962, at a point on U. S. Highway 90 at its point of intersection with U. S. Highway 98 at Spanish Fort in Baldwin County, Alabama, the Defendant, Jack Herbert, who was at said time and place an agent, servant or employee of the Defendant, Otto May, acting within the line and scope of his authority as such agent, servant or employee, did so negligently operate a motor vehicle as to cause it to run into, upon or against a motor vehicle being operated at said time and place by Grace K. Mays so as to cause the said motor vehicle being driven by the said Grace K. Mays to run into, upon or against a motor vehicle owned by the Plaintiff and as a proximate cause and result thereof the said Plaintiff's vehicle was injured

as follows: the left front fender and door was bent and damaged; the left front step was bent and damaged; the left front wheel was bent and damaged; the muffler and right front fender was bent and damaged and his said motor vehicle was rendered less valuable than before the said accident. Plaintiff avers that all of his damages was the result of the negligence of the Defendant, Jack Herbert, who was at said time and place an agent, servant or employee of the Defendant, Otto May, acting within the line and scope of his authority as such agent, servant or employee, hence this suit.


Attorney for Plaintiff

Ex-6-26-63

MA 5609

Amos C. Wagner

VS

Jack Herbert &
Otto May

Received 20 day of June 1963
and on 26 day of June 1963
I served a copy of the within Doc
on Jack Herbert &
Otto May
By service on _____

TAYLOR WILKINS, Sheriff
By Thompson

THE SHERIFF CLAIMS A TOTAL OF
60 MILES AT 10¢ PER MILE
FOR A TOTAL OF \$ 6.00
P.H. Smith Sheriff
Tom D.S.

FILED
June 20 1963
ALICE J. DUCK, CLERK
REGISTER