

LEO BOLAR,

Plaintiff,

-VS-

EDWIN JOHNSON,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT F&W.

Case No. 5613

PLEAS


Comes the Defendant and offers the following pleas
to the Plaintiff's Complaint:

ONE

Not Guilty.

TWO

The Defendant says that at the time and place alleged
in the complaint, the Plaintiff so negligently operated the
vehicle he was driving as to run into, upon, or against the
Defendant's vehicle and said negligence of the Plaintiff con-
tributed proximately to the injuries and damages complained of
by the Plaintiff; wherefore, the Plaintiff should not recover.


E. G. RICKARBY, Attorney
for Defendant.

FILED

OCT 7 1963

ALICE J. DICK

CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No. _____

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon EDWIN JOHNSON

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against _____

EDWIN JOHNSON

_____, Defendant_____

by LEO BOLAR

_____, Plaintiff_____

Witness my hand this

25

day of

June

19 63

Ed-8-8-63

Deane French Clerk

STATE of ALABAMA**Baldwin County****CIRCUIT COURT**

LEO BOLAR

Plaintiffs

vs.

EDWIN JOHNSON

Defendants

Summons and Complaint**FILED**

Filed

19

JUN 25 1963**ALICE L. DUCK****CLERK
REGISTER**

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
APPROXIMATELY $\frac{1}{2}$ to 1 mile
East of Daphne, on
Belforest Road.

Received In Office

June 25, 1963

Sheriff.

I have executed this summons

this

8th day of Aug1963

by leaving a copy with

Edwin Johnson

Sheriff claims 50 miles at

Ten Cents per mile Total \$ 5.00

TAYLOR WILKINS, Sheriff

BY

Fred Leibert
DEPUTY SHERIFF

Taylor Wilkins

Sheriff.

Fred Leibert

Deputy Sheriff.

Belforest

LEO BOLAR

Plaintiff

-VS-

EDWIN JOHNSON

Defendant

) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY, ALABAMA

) AT LAW.

) No. 5613

COUNT ONE:

Plaintiff claims of the Defendant the sum of ONE HUNDRED EIGHTY-EIGHT and 07/100 (\$188.07) DOLLARS, as damages, for that heretofore and on, to-wit; the 22nd day of September, 1962, while the Plaintiff was operating his vehicle along a public road in Baldwin County, Alabama, approximately one and one-half (1½) miles West of Loxley, Alabama, being then and there a public highway in Baldwin County, Alabama, the Defendant so negligently operated the vehicle he was driving as to run into, upon or against the Plaintiff's vehicle as approximate result thereof, the Plaintiff was injured, in this: his automobile was bent, smashed, broken and otherwise damaged, rendered permanently less valuable, and he was deprived of the use thereof, for a period of time: for all of which Plaintiff claims damages as aforesaid.

DUCK & LACEY
Attorneys for Plaintiff

By: 

John V. Duck

Defendant may be served
approximately ½ mile to
1 mile east of Daphne,
on Belforest Road.

LEO BOLER, ET AL,
Plaintiff


- VS -

ELVIN JOHNSON,
Defendant

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Ø
Ø

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
AT LAW.

Comes E. G. RICKARBY, appearing as Attorney for the
Defendant in the above styled cause, and demands the
right to demur or plead further in said cause.


E. G. RICKARBY,
Attorney for Defendant.

FILED
SEP 12 1963
ALICE L. DICK, CLERK
REGISTER

LEO BOLAR,

Plaintiff,

-VS-

EDWIN JOHNSON,

Defendant.

Q

Q

Q

Q

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Q

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by the Plaintiff; wherefore, the Plaintiff should not recover.


E. G. RICKABY, Attorney
for Defendant.

FILED

OCT 8 1933

WILLIE J. DUCK, CLERK
REGISTER

LAW OFFICES
E. G. RICKARBY
392 FAIRHOPE AVENUE
FAIRHOPE, ALABAMA

October 3, 1963

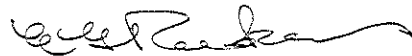
Mrs. Alice Duck
Clerk of the Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck:

Inre: Leo Bolar
Vs: Edwin Johnson
Case No. 5613
Our File: 63-232

Enclosed find Pleas. I have mailed copy of same
to Messrs. John Duck and Richard Lacey.

Yours very truly,



R/s
cc: Messrs. Duck & Lacey

TELEPHONE WA 8-9836

LAW OFFICES
E. G. RICKARBY
392 FAIRHOPE AVENUE
FAIRHOPE, ALABAMA

P. O. BOX 71

September 11, 1963

Mrs. Alice Duck
Clerk of Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck:

This defendant came in and asked me to represent him, and when I asked him to bring me in the complaint he had lost it. Would you make a photostatic copy of the complaint in this matter and let me have it? I have lost the original. Please enter my appearance for defendant.

Yours very truly,



EGR/ms
Enclosure

TELEPHONE WA 8-9836

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