

5624

JIM ODOM

PLAINTIFF

VS

LUTHER PAGE

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW, NO. _____

COMPLAINT

The Plaintiff claims of the Defendant the sum of Five Hundred (\$500.00) Dollars, as damages, for that heretofore on, to-wit: the 7th day of July 1962, the Plaintiff was operating his motor vehicle Eastwardly on a public highway, viz: U. S. Highway No. 90 at a point in Baldwin County, Alabama near Spanish Fort, Alabama, where he and said vehicle had a right to be, and the Defendant, Luther Page, so negligently operated a motor vehicle then and there as to cause said motor vehicle he was operating to run into, upon and against the automobile the Plaintiff was operating, thus causing said automboile to run into, upon and against the automobile directly ahead of him on said highway; and Plaintiff avers that as a proximate consequence thereof, the Plaintiff's vehicle was damaged in and about the front end and the rear end as well, the loss of which Plaintiff has incurred expense, all to his damage, hence this suit.


Attorney for Plaintiff



NOTE-O-GRAM

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JAMES A. BRICE

ATTORNEY AT LAW

BOX 298 • FOLEY, ALABAMA • WH 3-3601

MESSAGE

REPLY

TO Mrs. Alice J. Duck
Circuit Clerk
Bay Minette, Alabama

DATE

DATE July 2, 1963

Re: Jim Odom
Vs: Luther Page

Enclosure: Summons and Complaint

James A. Brice

cc: Howell, Johnston & Langford
Post Office Box 1652
Mobile, Alabama

BY

INSTRUCTIONS TO SENDER:

SIGNED

INSTRUCTIONS TO RECEIVER:

1. KEEP YELLOW COPY. 2. SEND WHITE AND PINK COPIES WITH CARBON INTACT.

1. WRITE REPLY. 2. DETACH STUB, KEEP PINK COPY, RETURN WHITE COPY TO SENDER.

5624

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 Luther Page

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 _____

Luther Page, Defendant_____

by _____

Jim Odom, Plaintiff_____

Witness my hand this \$ _____ day of July 1963

64-9-9-63

Prince J. Smith, Clerk

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

Jim Odom

Plaintiffs

VS.

Luther Page

Defendants

MOORE'S STORE

Summons and Complaint

Filed

FILED

19

JUL 31 1963

Clerk

ALICE J. DUCK

**CLERK
REGISTER**

James A. Brice

Plaintiff's Attorney

Defendant's Attorney

*Smith's Quarters - Town RT
at Snake Shack 2nd Rd. to RT 4
4th House on RT*

Defendant lives at

Foley, Alabama

Received In Office

, 19

Sheriff.

I have executed this summons

this

9-9

1963

by leaving a copy with

Luther Page

Sheriff claims 72 miles at
Ten Cents per mile Total \$ 7.20
by JM Eastman Sheriff
TAYLOR WILKINS, Sheriff
DEPUTY SHERIFF

Taylor Wilkins

Sheriff.

Jm Eastman

Deputy Sheriff.

Foley