

REBA McKINION,  
Plaintiff,

VS.

SEPTER PAYNE, SR.,  
Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

NO. 5643.

The Plaintiff claims of the Defendant the sum of \$750.00 as damages for that heretofore and on, to-wit: July 4th, 1963, a vehicle belonging to the Plaintiff was being lawfully operated on U.S. Highway 98 at a point thereon one mile East of Magnolia Springs, which road at said point is a public road in Baldwin County, Alabama, and at the same time and at the same place, the Defendant, Septer Payne, Sr., so negligently operated a motor vehicle as to cause or allow the same to run into, upon or against the vehicle owned by the Plaintiff, so that the Plaintiff's vehicle was broken, damaged, and crushed in that the left front fender, the left door framing, the left door, the left rear fender, the left side of the trunk, and all of the windows on the left side of the said automobile, were broken, damaged or crushed, and that the damages to the Plaintiff were the proximate consequence of the negligence of the Defendant aforesaid, hence this suit.



MASHBURN & OWENS  
Attorneys for the Plaintiff

**FILED**

JUL 22 1963

ALICE J. DUGG, CLERK  
REGISTER

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,  
BALDWIN COUNTY

No. \_\_\_\_\_

CIRCUIT COURT, BALDWIN COUNTY

JULY

TERM, 19 63

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon SEPTER PAYNE, SR.

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 \_\_\_\_\_

SEPTER PAYNE, SR., Defendant

by \_\_\_\_\_

REBA McKINION, Plaintiff

Witness my hand this 22nd day of July 19 63

Exp. 7-24-63

Alise J. Duck, Clerk

Defendant, Septer Payne, Sr., resides on Young Street at Fairhope,  
Alabama.

No. 5623

Page \_\_\_\_\_

# THE STATE OF ALABAMA

## BALDWIN COUNTY

### CIRCUIT COURT

REBA MCKINION,

vs.

Plaintiffs

SEPTER PAYNE, SR.

Phone <sup>WA</sup> 82924

Defendants

### SUMMONS and COMPLAINT

Filed

**FILED**

JUL 22 1963

Clerk

ALICE I. DUCK, CLERK  
REGISTER

young St -

MASHBURN &amp; OWENS

Plaintiff's Attorney S

Defendant's Attorney

Defendant lives at \_\_\_\_\_

RECEIVED IN OFFICE

July 22, 1963

, Sheriff

I have executed this summons  
this 24<sup>th</sup> day of July, 19 63  
by leaving a copy with

Septer Payne, Sr.

Sheriff claims

70

miles at

Ten Cents per mile Total \$

7.00

BY

Seibert  
Deputy Sheriff

Troy W. Wilkins

Sheriff

By: Fred L. Lipe

Deputy Sheriff

I hope