

WILLIAM L. LEE

PLAINTIFF

VS

DONALD OLA GAYLOR

DEFENDANT

IN THE CIRCUIT COURT OF

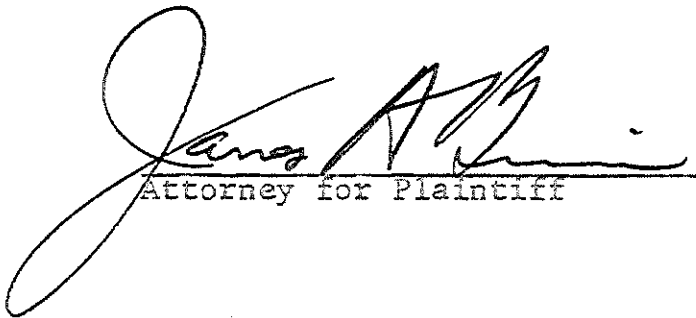
BALDWIN COUNTY, ALABAMA

AT LAW

5857

COMPLAINT

The Plaintiff claims of the Defendant Two Thousand Dollars (\$2,000.00) as damages for that heretofore on, to-wit: the 28th day of December 1962 the Plaintiff was operating his motor vehicle eastwardly on U. S. Highway 98 at its point of intersection with Baldwin County Road No. 65, in Baldwin County, Alabama, where he had a lawful right to be, and the Defendant, Donald Ola Gaylor, so negligently operated a motor vehicle then and there as to cause said motor vehicle to run into, upon and against the automobile the Plaintiff was operating and which Plaintiff owned; and Plaintiff avers that as a proximate consequence thereof, the Plaintiff's vehicle was damaged in and about the front end in the repair of which Plaintiff has incurred expenses; and further, that as a direct and proximate result of the aforesaid negligence of the Defendant, Plaintiff was deprived of the use of his motor vehicle necessary in and about his work, all to Plaintiff's damage, hence this suit.


Attorney for Plaintiff

FILED

DEC 10 1963

ALICE J. DUCK, 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 Donald Ola Gaylor

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 _____

Donald Ola Gaylor, Defendant.---

by _____

William L. Lee, Plaintiff.---

Witness my hand this 10 day of December 1963
64-1-6-64 Alice J. Luck, Clerk

No. 5829

Page 2 of 6

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

William L. Lee

Plaintiffs

vs.

6/5/92
Donald Ola Gaylor

Defendants

Summons and Complaint

Filed

FILED

19

DEC 10 1963

Clerk

ALICE J. DUCK, CLERK
REGISTER

RECEIVED

DEC 11 1963

SHERIFF'S OFFICE

~~James A. Brice~~

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

710 Merwina Avenue
Mobile, Alabama

Received In Office

Dec. 10, 1963

Sheriff.

I have executed this summons

this 1-6-64 19

by leaving a copy with

Donald Ola Gaylor

Ray L. Bridges
H. Davis

Sheriff.

Deputy Sheriff.