


WILLARD S. MEREDITH,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
vs.)	AT LAW
JACK D. HUBBARD)	
and)	
CLYDE D. HUBBARD,)	
Jointly and Individually)	
Defendants.)	CASE NO. <u>5880</u>

COUNT ONE

Plaintiff claims of the Defendants the sum of Five Thousand and No/100 Dollars, (\$5,000.00) for that heretofore and on, to-wit: December 20, 1962, the Defendant, Jack D. Hubbard, was the servant, agent or employee of the Defendant Clyde D. Hubbard, and that while acting within the line and scope of his employment as such servant, agent or employee, the said Jack D. Hubbard so negligently operated an automobile on Alabama Highway 59 at or near its intersection with Baldwin County Highway 34, both of which said highways were then and there public roads within the State of Alabama, County of Baldwin, as to cause or allow said vehicle to collide with a vehicle then and there owned and operated by the Plaintiff and that as a direct and proximate result of the negligence of the Defendants, as afore-said, the Plaintiff's automobile was broken and damaged and the market value thereof was greatly and permanently decreased; and further that as a direct and proximate result of said negligence of the Defendants, the Plaintiff's wife, who was then and there a passenger in the said automobile owned and operated by the Plaintiff, was injured about her person and that she was caused to incur extensive hospital and medical bills in and about the treatment of her said injuries and that Plaintiff was thereby caused to expend such sums of money as were necessary in the medical treatment and hospitalization of his wife, all as a direct and proximate result

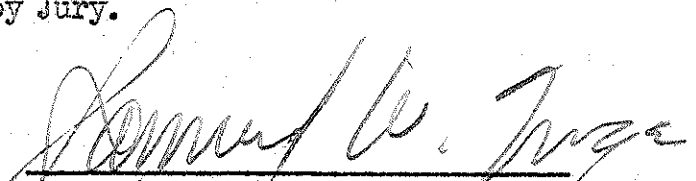
of the negligence of the Defendants, as aforesaid.

HENCE, this suit.



Samuel W. Inge
Attorney for Plaintiff

Plaintiff respectfully demands trial by Jury.



Samuel W. Inge
Attorney for Plaintiff

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No. 5880

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon Jack D. Hubbard and Clyde D. Hubbard

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

Jack D. Hubbard and Clyde D. Hubbard, Defendant

by Willard S. Meredith

Plaintiff

Witness my hand this 23rd day of December 1963

Alvin S. Duck, Clerk


WILLARD S. MEREDITH,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
vs.)	AT LAW
JACK D. HUBBARD)	
and)	
CLYDE D. HUBBARD,)	
Jointly and Individually)	
Defendants.)	CASE NO. <u>5888</u>

COUNT ONE

Plaintiff claims of the Defendants the sum of Five Thousand and No/100 Dollars, (\$5,000.00) for that heretofore and on, to-wit: December 20, 1962, the Defendant, Jack D. Hubbard, was the servant, agent or employee of the Defendant Clyde D. Hubbard, and that while acting within the line and scope of his employment as such servant, agent or employee, the said Jack D. Hubbard so negligently operated an automobile on Alabama Highway 59 at or near its intersection with Baldwin County Highway 34, both of which said highways were then and there public roads within the State of Alabama, County of Baldwin, as to cause or allow said vehicle to collide with a vehicle then and there owned and operated by the Plaintiff and that as a direct and proximate result of the negligence of the Defendants, as afore-said, the Plaintiff's automobile was broken and damaged and the market value thereof was greatly and permanently decreased; and further that as a direct and proximate result of said negligence of the Defendants, the Plaintiff's wife, who was then and there a passenger in the said automobile owned and operated by the Plaintiff, was injured about her person and that she was caused to incur extensive hospital and medical bills in and about the treatment of her said injuries and that Plaintiff was thereby caused to expend such sums of money as were necessary in the medical treatment and hospitalization of his wife, all as a direct and proximate result

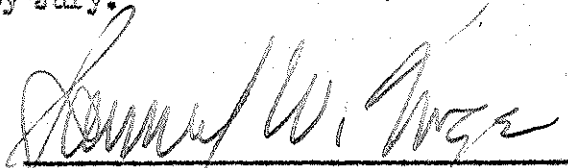
of the negligence of the Defendants, as aforesaid.

HENCE, this suit.



Samuel W. Inge
Attorney for Plaintiff

Plaintiff respectfully demands trial by Jury.



Samuel W. Inge
Attorney for Plaintiff

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, }

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TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA

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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

Jack D. Hubbard and Clyde D. Hubbard, Defendant

by Willard S. Meredith

, Plaintiff

Witness my hand this 23rd day of December 1963

N.E.

Alice J. Smith, Clerk

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

WILLARD S. MEREDITH

Plaintiffs

vs.

JACK D. HUBBARD & CLYDE D. HUBBARD

Defendants

Summons, and Complaint

Filed December 23, 19 63

Alice J. Duck Clerk

Samuel W. Inge

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

Dec. 23, 19 63

Sheriff.

I have executed this summons

this 19

by leaving a copy with

Returned 3 days of 19 64
Not found to pay amount of diligent search and in-
quire.

Charles L. P.

Sheriff.

Deputy Sheriff.

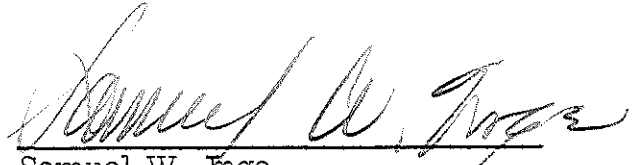
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vs.)	AT LAW
JACK D. HUBBARD)	
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Defendants.)	CASE NO. <u>5880</u>

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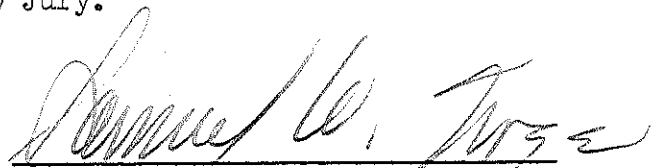
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of the negligence of the Defendants, as aforesaid.

HENCE, this suit.


Samuel W. Inge
Attorney for Plaintiff

Plaintiff respectfully demands trial by Jury.


Samuel W. Inge
Attorney for Plaintiff