

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Eunice Stephens and Henry J. Stephens to appear within thirty days from the service of this Writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the complaint of John MacArthur Collins.

Witness my hand this the 11<sup>th</sup> day of February, 1964.

  
Clerk

JOHN MacARTHUR COLLINS,

¶

Plaintiff,

¶

IN THE CIRCUIT COURT OF

vs.

¶

¶

BALDWIN COUNTY, ALABAMA

EUNICE STEPHENS and HENRY  
J. STEPHENS,

¶

AT LAW

Defendants.

¶

COUNT ONE:

The Plaintiff claims of the Defendants the sum of Three Hundred Dollars (\$300.00) as damages for that on, heretofore, to-wit: September 12, 1963, at a point on U. S. Highway #31, a public highway in Baldwin County, Alabama, within the City Limits of Bay Minette, Alabama, and opposite the business establishment known as the "Y-Drive In, South", the Defendant Henry J. Stephens, who was then and there the agent, servant or employee of the Defendant Eunice Stephens, and acting within the line and scope of his authority as such agent, servant or employee, did so negligently operate a motor vehicle as to cause or allow the same to run into or against the motor vehicle owned by the Plaintiff and as a proximate result of the negligence of such Defendant, aforesaid, the

automobile belonging to the Plaintiff was demolished, hence this suit.

CHASON, STONE & CHASON

By:

John Earle Chason  
Attorneys for Plaintiff

Defendant's address is

Rabon Route, Stockton, Alabama.

Ex-2-14-64

FILED

FEB 11 1964

ALICE J. DUCK, CLERK  
REGISTER

Received 12 day of Feb 1964  
and on 14 day of Feb 1964  
served a copy of the within  
on Eunice Stephens  
Henry J. Stephens  
by service on

TAYLOR WILKINS, Sheriff  
By W. A. Talbert  
Stockly  
Sheriff claims 44 miles at 4.50  
Ten Cents per mile  
TAYLOR WILKINS, Sheriff  
BY Talbert  
DEPUTY SHERIFF

JOHN MacARTHUR COLLINS,  
Plaintiff,

VS

EUNICE STEPHENS and HENRY  
J. STEPHENS,  
Defendants

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IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

AT LAW

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SUMMONS AND COMPLAINT

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FILED

FEB 11 1964

ALICE J. DUCK, CLERK  
REGISTER

CHASON & STONE  
ATTORNEYS AT LAW  
BAY MINETTE, ALABAMA