

WILLIAM R. CLEMENTS

Plaintiff

vs

RUSSELL J. SOCENSKI
and DAVID CUMMINGS

Defendants

X

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 5976

COUNT ONE

The plaintiff claims of the defendants the sum of Five Thousand (\$5,000.00) Dollars as damages, for that, heretofore, on to-wit, Sunday, January 19, 1964, plaintiff avers that he was operating his automobile on a public highway on to-wit, U. S. Highway No. 31 in the City of Bay Minette between the intersection of Dolive Street and the L & N overpass where he had a right to be and defendant, David Cummings operating an automobile property of defendant, Russell J. Socenski, so negligently operated the motor vehicle, to-wit, an automobile, then and there as to cause said motor vehicle which said David Cummings was operating to run into, over or against the automobile which plaintiff was then and there operating; and plaintiff avers that as a proximate consequence thereof, he was severely injured about the arms and shoulder suffering bruises and contusions and nerve injuries so that he was unable to perform his employment duties and suffered physical pain and mental anguish; and was caused to spend large sums of money for medical treatment, medical bills, x-rays and other such expenses.

Plaintiff further avers that his said automobile, a 1957 Bel Air, 2 Dr. Hardtop of a value of \$650.00 was damaged and is a total loss.

Plaintiff avers that all of his said damages were caused as a proximate consequence of the negligence of the said David Cummings while acting within the line and scope of his joint venture with the said Russell J. Socenski.

THOMPSON & WHITE

BY:


Attorneys for defendants

FILED

MAR 13 1964

ALICE J. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 59-76.....

.....TERM. 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Russell J. Socenski and David Cummings

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 Russell J.
Socenski and David Cummings....., Defendant.....

by William R. Clements.....

Plaintiff.....

Witness my hand this 13.....day of March 1964.

Alice D. Shuck....., Clerk

N.F.

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

WILLIAM R. CLEMENTS

Plaintiffs

vs.

RUSSELL J. SOCENSKI AND DAVID

CUMMINGS

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

Clerk

Returned 23 day of March 1964

Not found in my county after diligent search and inquiry.

Taylor Wilkins, Sheriff

By _____

Deputy Sheriff

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

1965

Sheriff

I have executed this summons

this 19.....

by leaving a copy with

Sheriff

Deputy Sheriff

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 5976.....

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Socenski and David Cummings....., Defendant.....

by William R. Clements.....

....., Plaintiff.....

Witness my hand this 13.....day of March..... 1944.....

Alice D. Duck..... Clerk

WILLIAM R. CLEMENTS	X		
Plaintiff	X	IN THE CIRCUIT COURT OF	
VS	X	BALDWIN COUNTY, ALABAMA	
RUSSELL J. SOCENSKI	X	AT LAW	NO. _____
and DAVID CUMMINGS	X		
Defendants	X		

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Plaintiff further avers that his said automobile, a 1957 Bel Air, 2 Dr. Hardtop of a value of \$650.00 was damaged and is a total loss.

Plaintiff avers that all of his said damages were caused as a proximate consequence of the negligence of the said David Cummings while acting within the line and scope of his joint venture with the said Russell J. Socenski.

FILED

MAR 18 1964

ALICE J. DUCK, CLERK
REGISTER

THOMPSON & WHITE

BY: 
Attorneys for defendants

WILLIAM R. CLEMENTS

Plaintiff

VS

RUSSELL J. SOCENSKI
and DAVID CUMMINGS

Defendants

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IN THE CIRCUIT COURT OF

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FILED

MAR 13 1964

ALICE I. DUCK, CLERK
REGISTER

THOMPSON & WHITE

BY


Attorneys for defendants

WILLIAM R. CLEMENTS

X

Plaintiff

X

IN THE CIRCUIT COURT OF

vs

X

BALDWIN COUNTY, ALABAMA

RUSSELL J. SOCENSKI
and DAVID CUMMINGS

X

AT LAW

NO. 5976

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THOMPSON & WHITE

BY: Lo Ross Thompson
Attorneys for defendants

FILED

MAR 13 1964

ALICE L. DICK, CLERK
REGISTER

WILLIAM R. CLEMENTS

Plaintiff

vs

RUSSELL J. SOCENSKI
and DAVID CUNNINGHAM

Defendants

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BALDWIN COUNTY, ALABAMA

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THOMPSON & WHITE

BY: 

Attorneys for defendants

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MAR 18 1964

ALICE J. DUCK, CLERK
REGISTER