

HENRY H. LINK,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
Vs.	X	BALDWIN COUNTY, ALABAMA
THOMAS G. MCGILL,	X	AT LAW
Defendant.	X	

Comes now the Defendant in the above styled cause and for answer to the Plaintiff's Bill of Complaint says:

1.

Not guilty.

2.

The Defendant alleges that the Plaintiff was himself guilty of negligence at the time and place alleged in the complaint which proximately contributed to his alleged damages; that he so negligently operated his motor vehicle at said time and place so as to cause or allow the same to run into, upon or against the vehicle of the Defendant, thereby proximately contributing to his own alleged injuries and damages and hence he should not be allowed to recover in this suit.

3.

The Defendant alleges that the Plaintiff was himself guilty of negligence at the time and place alleged in his complaint which proximately contributed to his alleged damages in that the Plaintiff negligently and carelessly operated his vehicle so closely behind the vehicle of the Defendant than was reasonable or prudent; that the Plaintiff did not have his vehicle under proper control at the time and place of the accident and that his speed was excessive, thereby proximately contributing to his own alleged damages and hence he should not be allowed to recover in this suit.

WILTERS & BRANTLEY

BY:

[Signature]
Attorney for Defendant

FILED
7-13
ALABAMA
CLERK OF COURT

HENRY H. LINK,

Plaintiff,

vs.

THOMAS G. MCGILL,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE.

6084

The Plaintiff claims of the Defendant, the sum of FIVE HUNDRED DOLLARS (\$500.00), as damages for that heretofore, and on, to-wit, December 3, 1963, on United States Highway #98, at a point thereon, to-wit, 9.9 miles West of the City Limits of Foley, Alabama, which highway at said point is a public road in Baldwin County, Alabama, the Plaintiff was operating his automobile and at the same time and at the same place, the Defendant so negligently operated the motor vehicle, which he was then and there driving, so as to cause or allow the same to run into, upon or against the automobile of the Plaintiff, and as a direct and proximate consequence of the negligence of the Defendant aforesaid, the automobile of the Plaintiff, a 1958 Chevrolet Station Wagon, was badly broken, torn and damaged in this: That the bumper, grill, right front fender, head lamps, doors, rear quarter panel and wheel housing were smashed, bent and buckled, hence this suit.

MASHBURN AND OWENS

By: J. Connor Owens, Jr.

Attorneys for Plaintiff.

FILED

JUN 9 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.....

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon THOMAS G. McGill

565 Stimpson Street

Fairhope, Alabama

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.....

Thomas G. McGill....., Defendant.....

by Henry H. Link.....

..... Plaintiff.....

Witness my hand this..... 9th..... day of..... June..... 19..... 64

..... Clerk

EX-6-12-64

No. 6084

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Henry H. Link

Plaintiffs

vs.

Thomas G. McGill

565 Stimpson St-

Fairhope, Ala. Defendants

SUMMONS AND COMPLAINT

Filed June 9, 1964 19.....

..... Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

6/10 1964

..... Sheriff

I have executed this summons

this 12th June 1964

by leaving a copy with

Thomas G. McGill

Sheriff claims 70 miles at

Ten Cents per mile Total \$ 7.00

TAYLOR WILKINS, Sheriff

BY [Signature]
DEPUTY SHERIFF

Taylor Wilkins Sheriff

[Signature] Deputy Sheriff

Thayer