

Jernigan's

"Collards and Everything"

WHISTLER, ALA.

November 6, 1964

Circuit Court, Baldwin County
State of Alabama

In Re:

LEE HOMER HUDSON.

Plaintiff,

VS.

LORENZO TRUPE and T. J.
JERNIGAN, JR.,

Defendants

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

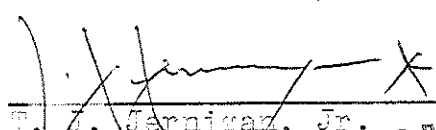
AT LAW

Case No. 6226

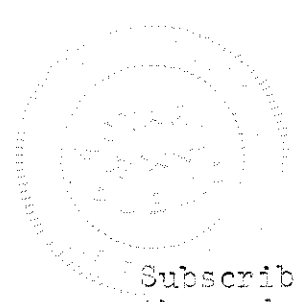

~~XXXXXX~~
ANSWER

I, the undersigned, T. J. Jernigan, Jr., herein state that I
am not guilty as charged, in the above stated case, and here-
with request a trial by Jury in this case.

Respectfully,


T. J. Jernigan, Jr.

Subscribed and sworn to before
the undersigned this 6 day of
November, 1964.



Notary Public, Mobile County, Ala.
Notary Public, Mobile County, Alabama
My Commission Expires March 2, 1966

FILED
NOV 6 1964
ALICE J. DICK, CLERK
REGISTER

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Lorenzo Trupe and T. J. Jernigan, Jr., 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 the same, then and there to answer the complaint of Lee Homer Hudson.

WITNESS my hand this 2 day of October, 1964.

Alice J. Luck
Clerk

Defendants' address:

Lorenzo Trupe, 704 Sullivan Avenue, Prichard, Alabama
T. J. Jernigan, Jr., 50 Gould Street, Whistler, Alabama

* * * * *

LEE HOMER HUDSON,

Plaintiff,

VS.

LORENZO TRUPE and T. J.
JERNIGAN, JR.,

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

6226

COMPLAINT

The plaintiff claims of the defendants the sum of Four Hundred Dollars (\$400.00) for that heretofore on to-wit, May 18, 1964, at a point where the Old Daphne Road intersects the East Hurricane Road in Bay Minette, Alabama, the defendant, Lorenzo Trupe, who was then and there an agent, servant or employee of the defendant, T. J. Jernigan, Jr., acting within the line and scope of his authority as such agent, servant or employee so negligently operated a motor vehicle so as to cause it to run into, upon or against the motor vehicle of the plaintiff and as a proximate result of the said negligence the plaintiff's motor vehicle was bent, broken and damaged; the right front fender was damaged; the grill panel, head lights and front bumper bar were bent and damaged; the muffler and radiator frame was damaged and bent and he was put to considerable time and trouble in and about repairing his said motor vehicle and

he was forced to be without the use of his said motor vehicle for a long period of time as a result of the said negligence of the said defendant. Plaintiff avers that all of his damages was the proximate result of the negligence of the defendant, Lorenzo Trupe, at said time and place while he was then and there an agent, servant or employee of the defendant, T. J. Jernigan, Jr., acting within the line and scope of his authority as such agent, servant or employee.

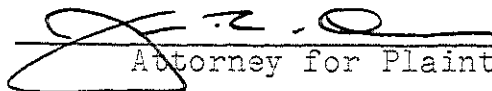
FILED

OCT 7 1964

ALICE J. DUCK, CLERK
REGISTER

64-10-12-64

64-10-14-64


Attorney for Plaintiff

9th Case No. 6226,
2453
36

Lee Homer Hudson
Pltf.

EXECUTED
This 12 day of Oct, 1964
by serving a copy of the within on
Lorenzo Trupe
RAY D. BRIDGES, Sheriff
By Geoffrey H. D.S.

vs.
12/1/64
Lorenzo Trupe &
14/6/64
T. J. Sernigan, Jr.

Defts.

EXECUTED
This 14 day of Oct, 1964
by serving a copy of the within on
T. J. Sernigan, Jr.
RAY D. BRIDGES, Sheriff
By B. F. Lewis D.S.

RECEIVED

OCT 8 1964

SHERIFF'S OFFICE

James R. Owen - Atty-