

FROM

Message
Reply

DATE:

JAN 12 1966

PRIORITY

- ☐ URGENT!
☐ SOON AS POSSIBLE
☐ NO REPLY NEEDED

FILE NO:

ATTENTION:

SUBJECT:

JAN 12 1966

TO

Clark, Circuit Court

MESSAGE

SIGNED:

DATE OF REPLY:

REPLY TO:

REPLY

SIGNED:

RECIPIENT: WRITE REPLY. RETURN WHITE TO SENDER. KEEP THIS PINK COPY.

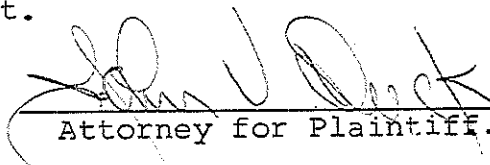
SCOTT CLEMENS
Plaintiff

-VS-

WILLY LEE HOLMES
Defendant

) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY, ALABAMA
) AT LAW. 6238
)
)

The Plaintiff claims of the Defendant the sum of ONE THOUSAND FIVE HUNDRED DOLLARS (\$1,500.00) as damages, for that, heretofore, on, to-wit; the 23rd day of February, 1964, the Plaintiff was driving his automobile along and upon Highway Numbered U. S. 98, traveling in Westwardly direction at a point thereon three and one-tenths miles (3 1/10) west of Foley, Alabama, at approximately two P. M. o'clock, where he had a right to be, and while said automobile was being operated and driven along U. S. Highway Numbered 98, which was then and there a public Highway in Baldwin C o u n t y , Alabama, the Defendant so negligently operated a motor vehicle, as to allow it to run upon, over or against the automobile of the Plaintiff, and as a direct and proximate result of the negligence of the defendant as aforesaid, the Plaintiff was injured in this; he suffered multiple contusions and abraisions, he was made otherwise sick, lame and sore, he suffered great physical pain and mental anguish, and he was caused to expend sums of money in and about the treatment of his said injuries; that he was caused to lose time from his employment, that his automobile was damages in this; the entire front end was bent, smashed and rendered a total loss, that both doors had to be replaced, that his radiator was torn, smashed and bent, that his grill was torn, smashed and molding had to be replaced; that both front fenders was smashed, bent and otherwise torn, that the frame was bent and knocked out of line: that his battery was smashed and rendered of no use, and that the tires was blown out, and rendered useless, and that his automobile was otherwise bent, smased, and torn, all as a proximate result of the negligence of the Defendant as aforesaid, hence this suit.


Attorney for Plaintiff.

The Defendant can be served at
Rt. 2 , Foley, Alabama

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 WILLY LEE HOLMES

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.....
WILLY LEE HOLMES....., Defendant.....

by
SCOTT CLEMMENS..... Plaintiff.....

Witness my hand this 14 day of Oct - 1964

67-10-29-64

Alice J. Duck Clerk

No. 6238

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

SCOTT CLEMENS

Plaintiffs

vs.

WILLY LEE HOLMES

Defendants

SUMMONS AND COMPLAINT

Filed 10-14 1964

Oliver Newk Clerk

Duck Lacey
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
Rt. 2 Foley, Alabama

Received In Office

10/14 1964

..... Sheriff

I have executed this summons

this Oct 29 1964

by leaving a copy with

Willy Lee Holmes

Sheriff claims 72 miles at

Ten Cents per mile Total \$ 7.20

TAYLOR WILKINS Sheriff

BY Taylor Wilkins
DEPUTY SHERIFF

Taylor Wilkins Sheriff
Robert C. ... Deputy Sheriff

Deputy