

JOHN V. DUCK  
RICHARD C. LACEY

DUCK & LACEY  
*Attorneys at Law*  
FAIRHOPE, ALABAMA

319 MAGNOLIA AVENUE  
P. O. BOX 296  
TELEPHONE 928-2191

February 16, 1965

62100

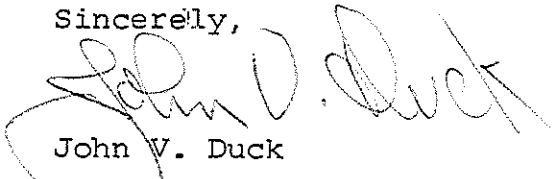
Mrs. Alice J. Duck  
P. O. Box 239  
Bay Minette, Alabama

Re: Jimmy D. Chrestman  
vs. Comer Jackson

Dear Mrs. Duck:

We enclose herewith Bill of Complaint to be  
filed together with copy of same and Summons  
to be served on Defendant.

Sincerely,

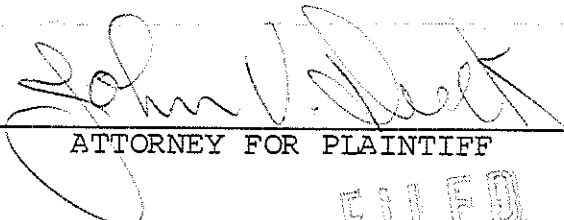
  
John V. Duck

JVD:lh  
Encls.

JIMMY D. CHRESTMAN,	)	IN THE CIRCUIT COURT OF
Plaintiff,	)	BALDWIN COUNTY, ALABAMA
vs.	)	AT LAW 6400
COMER JACKSON,	)	
Defendant.	)	

COUNT ONE

Plaintiff claims of the Defendant the sum of FIVE HUNDRED NINETY-FIVE and 16/100 (\$595.16) DOLLARS as damages, for that heretofore, and on, to-wit: the 8th day of March, 1964, at 2:20 P.M., the Defendant so negligently operated a motor vehicle on Baldwin County Highway No. 64, at a point thereon at its intersection with Catholic Cemetery Road, being then and there a public highway in Baldwin County, Alabama, as to allow the Defendant's vehicle to run into, upon or against the automobile being driven by the Plaintiff, and as a direct and proximate result of the negligence of the Defendant, the Plaintiff's automobile was damaged in that its rear bumper was torn off, the right rear quarter panel had to be replaced, the right was bent, torn and had to be replaced, the right front fender was rendered a total loss and had to be replaced, the rocker mold was bent torn and twisted, and had to be replaced, the right wheels were bent, torn and otherwise damaged, two tires were torn, and had to be replaced, three hubcaps were bent and torn and had to be replaced, the lights were knocked out, bent, smashed, the windshield was broken and had to be replaced, and that it was otherwise bent, torn and smashed, all as a result of the negligence of the Defendant as aforesaid, hence this suit.

  
 ATTORNEY FOR PLAINTIFF

The Defendant can be served  
at Route 1, Daphne, Alabama.

FILED  
 FEB 18 1965  
 ALICE L. SMITH, CLERK

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 COMER JACKSON

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.....

COMER JACKSON

....., Defendant.....

by JIMMY D. CHRESTMAN

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

Witness my hand this.....15.....day of.....Feb.....1965.....

EX-3-11-65

Debra J. Neucha

....., Clerk

Pass Church first home on R.

No. 6450.....

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

JIMMY D. CHRESTMAN

Plaintiffs

vs.

COMER JACKSON

Defendants

SUMMONS AND COMPLAINT

Filed FEB 18 1965 19.....

Clerk

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Route 1 Daphne, Alabama

Received In Office

FEB 18 1965

19.....

TAYLOR WILKINS

SHERIFF

Sheriff

I have executed this summons

this 11/ March 1965

by leaving a copy with

Daphne

Comer Jackson

Sheriff claims 54 miles at

Ten Cents per mile Total \$ 5.40

TAYLOR WILKINS, Sheriff

BY Roy Randall  
DEPUTY SHERIFF

Taylor Wilkins Sheriff

Roy Randall Deputy Sheriff

JIMMY D. CRESTMAN,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
Vs.	X	BALDWIN COUNTY, ALABAMA
COMER JACKSON,	X	AT LAW
Defendant.	X	CASE NO. 6400

Comes now the Defendant in the above styled cause and files the following demur to the Plaintiff's Complaint and for grounds therefor says:

1.

The Complaint does not state a cause of action.

WILTERS & BRANTLEY

BY:

*William M Brantley*  
Attorney for the Defendant

Defendant demands a trial by jury.

WILTERS & BRANTLEY

BY:

*William M Brantley*  
Attorney for Defendant

FILED  
MAR 15 1965  
ALICE J. DUCK, CLERK  
REGISTER

JIMMY D. CRESTMAN,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
Vs.	X	BALDWIN COUNTY, ALABAMA
COMER JACKSON,	X	AT LAW
Defendant.	X	CASE NO. 6400

AMENDED PLEAS

Comes now the Defendant in the above styled cause and amends his pleas by adding the following:

A.

Comes now the Defendant, Comer Jackson, and claims of the Plaintiff, Jimmy D. Crestman, by way of recoupment, the sum of \$600.00 as damages for that heretofore on, to-wit, the 8th day of March, 1964, at a point on or near U. S. Highway 64 where it intersects the Catholic Cemetery Road; said road being a public highway in Baldwin County, Alabama, and at said time and place referred to in the Plaintiff's Bill of Complaint, the said Plaintiff so negligently drove an automobile into, upon or against the truck of the Defendant, and as a direct and proximate consequence and result of said negligence, the Defendant's truck was damaged as follows: The rear fender was bent, the left door was torn and bent, the truck was knocked out of line, and was so damaged as to be a total loss to the Defendant, all to the loss of the Defendant in the aforesaid amount.

WILTERS & BRANTLEY

BY:

*William M. Brantley*  
Attorney for the Defendant

FILED  
OCT 2 1965  
ALICE J. DICK, CLERK  
RECORDED