

MORGAN KNOWLTON, A minor,
suing by and through
CLINTON KNOWLTON, his father
and next friend,

Plaintiff,

vs.

THOMAS SALAC,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 6646

COUNT ONE

The Plaintiff claims of the Defendant the sum of Five Thousand (\$5,000.00) Dollars as damages for that heretofore on to-wit: The 8th day of July, 1964, in a field where the Defendant was conducting a farming operation at a point approximately one mile east of Robertsedale, in Baldwin County, Alabama, the Defendant so negligently operated a motor vehicle, to-wit: A farm tractor, as to cause or allow the same to run into, upon or against a stump, thereby injuring the Plaintiff, who was then and there riding the said motor vehicle with and at the request of the Defendant as his employee, in that the Plaintiff received a severe injury to his left great toe which necessitated the amputation of a portion of said toe; he received a fracture of his left second toe; he was caused to incur large hospital and medical expenses; he has been caused to experience much pain and suffering and will continue to experience pain, suffering and discomfort in the future; he has been permanently disabled, all to the damage of the Plaintiff in the sum above mentioned, hence this suit.

CHASON, STONE & CHASON

By John Earle Chason

The Plaintiff respectfully requests
a trial of this cause by jury.

CHASON, STONE & CHASON

By John Earle Chason

FILED

56

AUG 18 1965

ALICE J. DICK, CLERK
REGISTER

6646

MORGAN KNOWLTON, A minor,
suing by and through
CLINTON KNOWLTON, his father
and next friend,

Plaintiff,

vs.

THOMAS SALAC,

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SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No.6646.....

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Thomas Salac

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 Salac....., Defendant.....

by Morgan Knowlton, a minor suing by and through Clinton Knowlton, his father.....
and next friend,....., Plaintiff.....

Witness my hand this.....18th.....day of.....August.....1965.....

64-8-28-65

Alice J. Duck Clerk

No. 6646

Page

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

MORGAN KNOWLTON, a Minor suing by
and through CLINTON KNOWLTON, his
father and next friend

Plaintiffs

vs.

THOMAS SALAC
Robertsdale, Ala.

Defendants

SUMMONS AND COMPLAINT

Filed August 18, 1965

Alice J. Duck Clerk

Chason, Stone & Chason

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED
Received In Office

AUG 19 1965 19

TAYLOR WILKINS
SHERIFF Sheriff

I have executed this summons

this 4-7-65 1965
by leaving a copy with

Thomas Salac

Cost \$50
Fee \$5.00

TAYLOR WILKINS
Deputy Sheriff
Charles Childers

Taylor Wilkins Sheriff

Charles Childers Deputy Sheriff

R. R. Allen