

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon John E. Edwards 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 same, then and there to answer the Complaint of John W. Hooks.

Witness my hand this 31st day of August, 1965.

Alice J. Leach
Clerk

JOHN W. HOOKS,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
vs.	X	BALDWIN COUNTY, ALABAMA
JOHN E. EDWARDS,	X	AT LAW
Defendant.	X	6670

COMPLAINT

COUNT ONE:

The Plaintiff claims of the Defendant the sum of Seven Hundred Dollars (\$700.00), as damages, for that, heretofore on to-wit: the 20th day of March, 1965, at a point on Baldwin County Highway 12 at its intersection with Styron dirt road near Foley, in Baldwin County, Alabama, the Defendant so negligently operated a motor vehicle as to cause or allow the same to run into, upon or against a motor vehicle belonging to the Plaintiff, and as a proximate result of such negligence the Plaintiff's automobile was

damaged in that its right front fender, the right front head-
lights, the bumper and radiator grill, and the right wheel were
bent, damaged or broken, all to the damage of the Plaintiff in
the sum above mentioned, hence this suit.

COUNT TWO:

The Plaintiff claims of the Defendant the sum of
Seven Hundred Dollars (\$700.00), as damages, for that heretofore
on to-wit: the 20th day of March, 1965, at a point on Baldwin
County Highway 12 at its intersection with Styron dirt road near
Foley, in Baldwin County, Alabama, the Defendant so wilfully and
wantonly operated a motor vehicle as to cause or allow the same
to run into, upon or against a motor vehicle belonging to the
Plaintiff, thereby wilfully and wantonly injuring the Plaintiff
in that the said automobile belonging to the Plaintiff was dam-
aged in that its right front fender, the right front headlights,
the bumper and radiator grill, and the right wheel were bent,
damaged or broken, all to the damage of the Plaintiff in the sum
above mentioned, hence this suit.

CHASON, STONE & CHASON

By: John Earle Chason
Attorneys for Plaintiff

FILED
AUG 27 1965
ALICE L. DAVIS, CLERK
REGISTER

EX-9-17-65

6670

JOHN W. HOOKS,
Plaintiff,

VS

JOHN E. EDWARDS,
Defendant.

Rt. 2, Foley, Ala.

Turn Left at Sanspree Shad.

Received 1 day of Sept 1965
17 day of Sept 1965
I received a copy of the within S & C
on John E. Edwards

By service on above

TAYLOR WILKINS, Sheriff

Jm Eastman

Bon Secours, Ga.

Sheriff claims 86 miles at

Ten Cents per mile Total \$ 8.60

TAYLOR WILKINS, Sheriff

BY Jm Eastman
DEPUTY SHERIFF

SUMMONS AND COMPLAINT

FILED

AUG 27 1965

ALICE J. DUCK, CLERK
REGISTER

CHASON, STONE & CHASON
ATTORNEYS AT LAW