

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No. _____

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon IRMAL R. HARRIS - Foley, Alabama

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 _____

IRMAL R. HARRIS Defendant_____

by _____

J. C. BURNETT Plaintiff_____

Witness my hand this 18 day of Feb 1965

EX-2-20-65

Alise L. Leuck, Clerk

No. 6404 Page

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

J. C. BURNETT

Plaintiffs

VS.

IRMA L. R. HARRIS

Defendants

Summons and Complaint

Filed _____ 19__

Feb 19 1985

Clerk

WILTERS, BRANTLEY & NESBIT

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED
Foley, Alabama
Received In Office

Received-In Office

FEB 18 1965 19

TAYLOR WILKINS

SHERIFF

Sheriff.

I have executed this summons

this 20th Feb. 1965

by leaving a copy with

Arnal R. Harris

Sheriff claims 72
 Ten cents per mile Total \$ 7.20 miles at
 TAYLOR WILKINS, Sheriff
 DEPUTY SHERIFF

BY 007 WILKINS, Sheriff
 DEPUTY SHERIFF

DEPUTY SHERIFF

Taylor W. Phineas

Sheriff.

Mr. Eastburn

Deputy Sheriff.

Talay, Ab -

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BALDWIN COUNTY, ALABAMA

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NO. 000

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ALABAMA
NO. 6404

DEMURRER

- James Stones Gerson
Attorneys for Defendant

3129

[illegible]

6404
J. C. BURNETT,
Plaintiff,

vs

IRMAL R. HARRIS,
Defendant.

DEMURRER

J. C. BURNETT,
PLAINTIFF
vs
IRMAL R. HARRIS,
DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

NO. 6404

1.

The Plaintiff, J. C. Burnett, claims of the Defendant the sum of TWO THOUSAND FIVE HUNDRED AND NO/100 (\$2,500.00) as damages for that heretofore on, to-wit, the 25th day of July, 1964, the Plaintiff's son, Darren Wayne Burnett, a minor under the age of fourteen years, was riding in the automobile owned by the Plaintiff, which was being driven in an easterly direction along and upon Fairhope Avenue, a public road in Fairhope, Baldwin County, Alabama, at a point where Fairhope Avenue intersects Greeno Road; that at said time and place, the Defendant, Irmal R. Harris, who was driving an automobile in a northerly direction on Greeno Road, a public road in Fairhope, Baldwin County, Alabama, so negligently operated her automobile as to cause it to run into and against the Plaintiff's automobile in which Darren Wayne Burnett, a minor, was riding, and as a direct and proximate consequence and result of said negligence, the Plaintiff's automobile was bent, twisted and broken, and Darren Wayne Burnett, a minor, was injured as follows: He received multiple abrasions, contusions and lacerations on his head, he received multiple contusions on his body, his right clavicle was fractured and he got a piece of glass in one of his ears. The Plaintiff avers, that he has been caused to spend large sums of money to fix and repair his automobile, that he was caused to spend money to replace his automobile while it was being repaired, that he had to spend money for Doctor's, drugs and hospitalization for the treatment of his said minor son, all to the loss of the Plaintiff in the aforesaid amount.

WILTERS, BRANTLEY & NESBIT

Defendant demands a trial by Jury.

By:

Attorney for the Plaintiff

WILTERS, BRANTLEY & NESBIT

NO. _____

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

J. C. BURNETT,

PLAINTIFF

VS

IRMAL R. HARRIS,

DEFENDANT

Wilters, Brantley & Nesbit
Robertsdale, Alabama

Plaintiff's Attorneys

Chason, Stone & Chason
Bay Minette, Alabama

Defendant's Attorneys