

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 6536

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Ted Dextras, as Administrator of the Estate of
Richard Foster, Deceased

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 Ted Dextras,
as Administrator of the Estate of Richard Foster, Deceased, Defendant.....
by Thomas W. Smith, a minor suing by and through James C. Smith, as his
father and next friend, Plaintiff.....

Witness my hand this.....7th.....day of.....June.....19.65

Alice J. Luck....., Clerk

THOMAS W. SMITH, a minor,
suing by and through James C.
Smith as his father and next
friend,

Plaintiff,

vs.

TED DEXTRAS, as Administrator
of the Estate of Richard Foster,
Deceased,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO _____

Now comes the Plaintiff, Thomas W. Smith, suing by and through James C. Smith, as his father and next friend, and claims of the Defendant, Ten Thousand Dollars (\$10,000) damages for that on, to-wit, the 27th day of June 1964 at the intersection of the Flowers Road and the Bon Secour Road, three and one-half miles South and two miles West of the center of the City of Foley in Baldwin County, Alabama, this being the intersection of Baldwin County Road #65 and Baldwin County Road #12, the decedent, Richard Foster, did at this time and place negligently operate an automotive vehicle so as to run in front of, upon or against an automotive vehicle in which the Plaintiff was riding and as a direct and proximate result and consequence of the negligence of the said Richard Foster, the Plaintiff was injured; his face was crushed; his legs were broken, he suffered shock; he suffered severe abrasions, cuts and contusions; he was hospitalized; he suffered permanent injury and disfigurement and he has spent large sums for medical and hospital treatment, all to his damage as aforesaid.

FILED

JUN 7 1965

ALICE L. DUCK, CLERK
REGISTER


Attorney for Plaintiff

THOMAS W. SMITH, a minor,
suing by and through James C.
Smith as his father and next
friend,

Plaintiff,

vs.

TED DEXTRAS, as Administrator
of the Estate of Richard Foster,
Deceased,

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

NO. 10536

Comes the Defendant in the above styled cause and for
plea to the Complaint filed in said cause, says:

1. Not guilty.

FILED

JUN 7 1895

ALICE L. DUCK, CLERK
REGISTER

Chas. Stone & Chas.
Attorneys for Defendant