

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

Circuit Court, Baldwin County

STATE OF ALABAMA
BALDWIN COUNTY

No.

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JOHN CARLTON KENDRICK

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.....

JOHN CARLTON KENDRICK

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

by AMOS A. BEASLEY

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

Witness my hand this 6 day of July 1965

EX-7-19-65

Deirdre J. French Clerk

No. 6583

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

AMOS A. BEASLEY

Plaintiffs

vs.

JOHN CARLTON KENDRICK

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

..... Clerk

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
can be served at S & H Concrete
Co., Foley, Ala. or at his home
in Stapleton, Ala.

Received In Office

JUL 6 1965

TAYLOR WILKINS

SHERIFF

19.....

Sheriff

I have executed this summons

this July 19 1965
by leaving a copy with

John Carlton Kendrick

Sheriff claim 78 7.20
Ten Cents per mile to
TAYLOR WILKINS
BY J. M. Eastman
DEPUTY SHERIFF

Taylor Wilkins Sheriff

J. M. Eastman Deputy Sheriff

Foley

SPEED LETTER

DUCK & LACEY

Attorneys at Law

P. O. DRAWER A-J - FAIRHOPE, ALABAMA

MESSAGE

REPLY

TO Mrs. Alice J. Duck
Bay Minette, Ala.

DATE

DATE July 2, 1965

Re: Amos A. Beasley vs. Kendrick

Dear Mrs. Duck:

Enclosed find Bill of Complaint to be
filed togetherwith copy of same and Summons
to be served.

Sincerely,

SIGNED

SIGNED

1. 1000 2. 1000 3. 1000 4. 1000

\$500

AMOS BEASLEY,

Plaintiff,

VS.

JOHN CARLTON KENDRICK,

Defendant.

IN THE

CIRCUIT COURT OF BALDWIN COUNTY,

ALABAMA. AT LAW.

NO. 6583

October 17, 1966

MR. AMOS BEASLEY, BEING FIRST DULY SWORN, TESTIFIED AS FOLLOWS:

Examination by Mr. Duck

Q. What is your name, please?

A. Amos Beasley.

Q. Were you involved in an automobile accident in Baldwin County, Alabama, back in September of 1964?

A. Yes sir.

Q. Do you know who was driving the other car?

A. John Kendrick.

Q. Did you talk to him at the scene of the accident?

A. Yes sir.

Q. Did he make himself known to you as John Kendrick - John Carlton Kendrick?

A. The highway patrolman came up - -

Q. And it was made known to you that that was the name of the person?

A. Yes sir.

Q. Did you suffer personal injuries as a result of that accident?

A. Yes sir.

Q. Were you driving your car?

A. Yes sir.

Q. How did the accident happen?

A. This boy struck us from behind on a bridge.

Q. Were you stopped?

A. No sir; I was travelling about 50 miles an hour; he was making 80 to 90 miles an hour.

Q. Were you injured personally as a result of that accident?

A. Slightly.

Q. What injuries did you receive?

A. Tore the ligaments loose between my ribs.

Q. Was it necessary for you to have treatment by a Doctor?

A. Yes sir.

Q. Did you go to a hospital ?

A. For first aid and when I got back home was when it gave me trouble and I had to see a Doctor at home.

Q. How much hospital and Doctor bill did you incur?

A. Oh, me personally - I would say about \$35.00.

Q. Did you lose any time from your work?

A. About a week.

Q. Where do you work?

A. Dothan Guano Company.

Q. What is your income per week?

A. \$125.00 a week.

Q. Did the thing bother you very long ? - - Your injuries?

A. No sir, just for a period of time - - bothered me for six or seven weeks.

Q. Very painful?

A. Very sore when I would breathe and I had to be strapped up.

Q. What kind of car were you driving?

A. 1962 Rambler American.

Q. You have bought and sold automobiles like that?

A. I have bought - - (pge 2)

Q. What was the reasonable market value of your car just before the accident?

A. I would say \$1200 to \$1400.

Q. What was the reasonable market value of it right after the accident?

A. Nothing; it was a total loss.

Q. In otherwords, you feel that you lost about \$1250.00 for the value of your car as a result of this accident?

A. Yes sir.

C E R T I F I C A T E:

I hereby certify that the foregoing, consisting of pages 1 to 3 both inclusive, correctly sets forth a true and correct transcript of the testimony as taken by me in Open Court, on this the 17th day of October, 1966.

This the 17th day of October, 1966.

Louise Amending
Court Reporter