

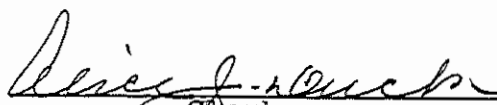
STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT - LAW SIDE

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Ellis Kinsey 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 Despina Dimitriadon.

Witness my hand this the 26 day of August, 1957.


Clerk

DESPINA DIMITRIADON,	X	
Plaintiff	X	IN THE CIRCUIT COURT OF
vs.	X	
	X	BALDWIN COUNTY, ALABAMA
ELLIS KINSEY,	X	
Defendant.	X	AT LAW
	X	

The Plaintiff claims of the Defendant the sum of One Thousand Dollars (\$1,000.00) as damages for that on, heretofore, to-wit: the 14th day of September, 1956, at about 9:30 o'clock P. M. at a point on U. S. Highway 31, in Atmore, Escambia County, Alabama, just East of the business district of Atmore, Alabama, which point was a public highway in Escambia County, Alabama, the Defendant Ellis Kinsey, so negligently operated a motor vehicle as to cause or allow the same to run into, upon and against a motor vehicle owned by the Plaintiff which was then and there being operated by Joseph Patrick Serone and as a proximate consequence and result of the negligence of the Defendant aforesaid, the motor vehicle of the Plaintiff was damaged in this: The right front fender, the front bumper, the right front wheel assembly, the right front wheel cap and one tire were bent, broken and damaged and the Plaintiff was caused to lose the use of his said motor vehicle, which was used in his business, for a period of, to-wit: three days, all to the damage of the Plaintiff

aforesaid, wherefore he brings this suit and asks judgment in the above amount.

CHASON & STONE

By: 

Defendant's address: Route 1, Box 28
Foley, Alabama

Executed Sept. 7, 1957

Received 26 day of Aug 1957
d on 7 day of Sept 1957
served a copy of the within S/C
Ellis Kinsey

service on _____

TAYLOR WILKINS, Sheriff
By Charles Kinsey, S.

Foley

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

DESPINA DIMITRIADON,
Plaintiff

VS.

ELLIS KINSEY,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

SUMMONS AND COMPLAINT

FILED
AUG 26 1957
ALICE J. DUCK, Clerk

LAW OFFICES
CHASON & STONE
BAY MINETTE, ALABAMA