

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 Daniel E. Hare 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 Johnnie Perdue, Jr., a minor nine months of age who sues by and through his father and next friend, Johnnie Perdue, Sr.

Witness my hand this 23 day of July, 1966.

Alice J. Duck
Clerk

JOHNNIE PERDUE, JR., a minor X
nine months of age who sues by
and through his father and next X
friend, JOHNNIE PERDUE, SR.,

Plaintiff,

vs.

DANIEL E. HARE,

Defendant.

X IN THE CIRCUIT COURT OF
X BALDWIN COUNTY, ALABAMA
X LAW SIDE
X 7084
X

The Plaintiff claims of the Defendant the sum of Fifteen Hundred Dollars (\$1500.00) as damages for that on to-wit, April 17, 1966, on County Road 27, about 3.2 miles North of Alabama 104 in Baldwin County, Alabama, the Defendant negligently drove an automobile into or against an automobile in which the Plaintiff was riding and as a proximate result of the negligence of such Defendant the Plaintiff was injured in this: he received a slight fracture of the skull and was bruised and lacerated, all to the damage of the Plaintiff in the sum above mentioned, hence this suit.

FILED

JUL 25 1966

ALICE J. DUCK, CLERK

49

Charles Stone & Sharon
Attorneys for Plaintiff

JOHNNIE PERDUE, JR., a minor
nine months of age who sues by
and through his father and next
friend, JOHNNIE PERDUE, SR.,

Plaintiff,

vs.

DANIEL E. HARE,

Defendant.

SUMMONS AND COMPLAINT

50