

LUMAN RODGERS,	)	
Plaintiff	)	IN THE CIRCUIT COURT OF
VS	)	BALDWIN COUNTY, ALABAMA
FRANK E. FOSTER,	)	CIVIL DIVISION
Defendant	)	NO. <u>7165</u>

The Plaintiff claims of the Defendant THREE HUNDRED DOLLARS (\$300.00) for that heretofore on, to-wit June 18, 1966 the Defendant did negligently operate an automotive vehicle at or near Ledas and Lou Williams Place, being on a public street in the City of Foley, Baldwin County, Alabama as to run upon, over and against the Plaintiff's automobile which was then and there being operated, at the time and place aforesaid, by the Plaintiff's daughter, Carolyn Rodgers, and as a direct and proximate result of the Defendant's negligence, the Plaintiff's automobile was damaged in this; The front bumper was bent and damaged and the entire left side including front fender, molding, left door and left quarter panel were torn and smashed. The Plaintiff alleges that he incurred damages in the aforesaid amount all for which the Plaintiff sues.

**FILED**

SEP 6 1966

ALICE J. DICK, CLERK  
REGISTERED

*Ernest M. Bailey*  
ERNEST M. BAILEY, Attorney for  
Plaintiff

LUMAN RODGERS,

Plaintiff

VS

FRANK. E. FOSTER,

Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
CIVIL DIVISION  
NO. \_\_\_\_\_

Defendant may be  
served at 5th Street,  
West, Foley, Alabama

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court, Baldwin County

No.....

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Frank E. Foster

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.....  
Frank E. Foster....., Defendant.....

by .....  
Luman Rodgers..... Plaintiff.....

Witness my hand this 6<sup>th</sup> day of September 19 66

64-9-30-66

Alvie D. Luck Clerk

No. 7165 Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Luman Rodgers

Plaintiffs

vs.

Frank E. Foster

Defendants

SUMMONS AND COMPLAINT

Filed ..... 19.....

SEP 6 1966

Clerk

ALICE I. DICK, CLERK  
REGISTER

Ernest M. Bailey

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

5 Street West

Foley, Alabama

RECEIVED  
Received In Office

SEP 6 1966 19.....

JAYLOR WILKINS, Sheriff

I have executed this summons

this 30th Sept 1966

by leaving a copy with

Frank E. Foster

Shoriff claims 72 miles at

Ten Cents per mile Total 7.20

JAYLOR WILKINS, Sheriff

BY J. M. Eastman  
DEPUTY SHERIFF

Jaylor Wilkins Sheriff

J. M. Eastman Deputy Sheriff  
Foley, Ala.