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JAMES RAY SUMMERLIN,)
Plaintiff,)
vs.)
LARRY RAY COLE and JOHNNY)
PORTEMONT, jointly and)
individually,)
Defendants,)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

Ms. 7229

COUNT ONE

Plaintiff claims of the Defendants the sum of FOUR HUNDRED TWENTY-FOUR AND 61/100 (\$424.61) DOLLARS as damages, for that, heretofore on, to-wit: the 8th day of February, 1966, LARRY RAY COLE, the agent, servant or employee of the Defendant, JOHNNY PORTEMONT, was operating a motor vehicle on Alabama Highway U. S. 31, at a point thereon seven miles east of Spanish Fort, Alabama, while acting within the line and scope of his employment as such agent, servant or employee, negligently ran the motor vehicle upon or against the automobile of the Plaintiff, and by reason thereof and as the proximate result and consequence thereof, the Plaintiff's automobile was damaged in that: the left rear quarter panel was bent and smashed, the left rear wheel was destroyed, that the left rear roof panel was bent and otherwise damaged, that the left chrome rail was bent, smashed and otherwise damaged, that the trunk opening was bent and smashed, and that related to the said automobile and otherwise bent, smashed and had to be repaired, for all of which he claims damages as aforesaid.


ATTORNEY FOR PLAINTIFF



JAMES RAY SUMMERLIN,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
vs.)	AT LAW
LARRY RAY COLE and JOHNNY)	<i>No. 7229</i>
PORTEMONT, jointly and)	
individually,)	
Defendants,)	

COUNT ONE

Plaintiff claims of the Defendants the sum of FOUR HUNDRED TWENTY-FOUR AND 61/100 (\$424.61) DOLLARS as damages, for that, heretofore on, to-wit: the 8th day of February, 1966, LARRY RAY COLE, the agent, servant or employee of the Defendant, JOHNNY PORTEMONT, was operating a motor vehicle on Alabama Highway U. S. 31, at a point thereon seven miles east of Spanish Fort, Alabama, while acting within the line and scope of his employment as such agent, servant or employee, negligently ran the motor vehicle upon or against the automobile of the Plaintiff, and by reason thereof and as the proximate result and consequence thereof, the Plaintiff's automobile was damaged in that: the left rear quarter panel was bent and smashed, the left rear wheel was destroyed, that the left rear roof panel was bent and otherwise damaged, that the left chrome rail was bent, smashed and otherwise damaged, that the trunk opening was bent and smashed, and that Plaintiff's said automobile was otherwise bent, smashed and had to be repaired, for all of which he claims damages as aforesaid.

[Signature]
ATTORNEY FOR PLAINTIFF

FILED
OCT 27 1966
CLERK
JAMES L. COLE

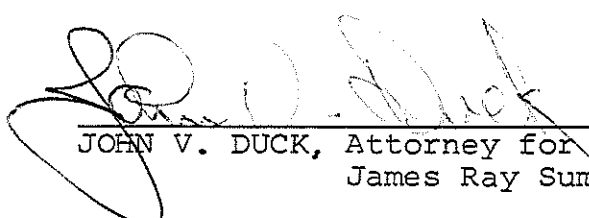
STATE OF ALABAMA

BALDWIN COUNTY

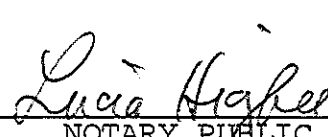
Personally appeared before me, the undersigned authority, JOHN V. DUCK, who being by me first duly and legally sworn, doth depose and say as follows:

My name is JOHN V. DUCK, I am Attorney for the Plaintiff in the case of JAMES RAY SUMMERLIN vs. LARRY RAY COLE and JOHNNY PORTEMONT, jointly and individually, Defendants, and that LARRY RAY COLE is a non-resident of the State of Alabama and is presently residing at Route 3, Brazil, Indiana.

Further the Affiant sayeth not.


JOHN V. DUCK, Attorney for Plaintiff
James Ray Summerlin.

Sworn to and subscribed before
me this 25th day of October,
1966.


NOTARY PUBLIC

FILED
OCT 27 1966

NOTARY PUBLIC
CLERK
JAMES L. DUCK

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 LARRY RAY COLE and JOHNNY PORTEMONT,

jointly and individually,

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.....

LARRY RAY COLE and JOHNNY PORTEMONT, jointly and....., Defendant.s.
individually,

by JAMES RAY SUMMERLIN,

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

Witness my hand this 27 day of October 1966

Alvin J. Hirsch Clerk

508

Executed 31 days of Oct, 1966
Mont. Co. sh. M.S. Butler
D. S. J. J. Romeo

No. 77-29

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

JAMES RAY SUMMERLIN,

Plaintiffs

vs.

LARRY RAY COLE and JOHNNY
PORTEMONT, jointly & Defendants
individually,

SUMMONS AND COMPLAINT

Filed 10-27 1966

Angela Duck Clerk

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

578
Defendant lives at
Larry Ray Cole - Rt. 3,
Brazil, Indiana
Johnny Portemont, P.O. Box 670,
Andalusia, Alabama

RECEIVED IN OFFICE

COCT 31 1966

Sheriff

I have executed this summons
M. S. Butler, Sheriff

this 19.....

by leaving a copy with

Executed by serving 3 copies of
the within on Agnes Baggett
Secretary of State of The State of
Alabama.

(This the 31 day of Oct 1966)

Sheriff of Montgomery County

M. S. Butler,

By J. R. Remo D. S.

The Sheriff claims \$1.00 travel ex-
pense on each of 1
process(es) or a total of \$ 1.00

M. S. Butler, Sheriff

Montgomery County,

Alabama.

Sheriff

Deputy Sheriff