

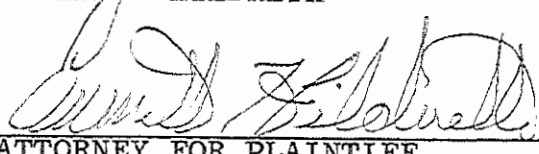
MOTION TO DISMISS.

NATHANIEL EDMOND,	X	IN THE CIRCUIT COURT OF
PLAINTIFF.	X	BALDWIN COUNTY, ALABAMA.
vs.	X	AT LAW.
MACK GRAY,	X	CASE NO: <u>7315</u> .
DEFENDANT.	X	

Comes now the Plaintiff by his Attorney, and moves the Court to dismiss the above styled cause, at Plaintiff's cost and as grounds therefor respectfully shows:

That all matters in controversy in this suit between plaintiff and defendant have been fully settled and compromised by agreement, and that there is no further occasion for the prosecution of this suit.

TUCKER & HILDRETH


ATTORNEY FOR PLAINTIFF.

FILED

JAN 9 1937

AUDIE L. DICK, CLERK
REGISTER

STATE OF ALABAMA X
BALDWIN COUNTY X

IN THE CIRCUIT COURT.

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summon MACK GRAY, Star Route A, Atmore, Alabama; to appear in the Circuit Court of Baldwin County, Alabama, at the place of holding the same, and plead, answer, or demur within thirty (30) days from service hereof, to the complaint of NATHANIEL EDMOND, PLAINTIFF.

Witness my hand this 16 day of December, 1966.

Oliver J. Puck
CLERK

* * * * *

C O M P L A I N T .

NATHANIEL EDMOND,
PLAINTIFF.

vs.

MACK GRAY,
DEFENDANT.

X
X
X
X
X
X
X
X

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

AT LAW.

CASE NO. 7315.

COUNT ONE.

THE PLAINTIFF, NATHANIEL EDMOND, claims of the Defendant, Mack Gray, the sum of Five Thousand (\$5,000.00) Dollars, as damages, for that heretofore and on, to-wit; the 17th day of December, 1965, the Plaintiff, Nathaniel Edmond, was a passenger in an automobile upon a public highway in Baldwin County, Alabama, to-wit: on county road No. 61, at its intersection with Rabon Road, some 8.6 miles north of Perdido, Alabama, in Baldwin County, Alabama, and where the Plaintiff had a right to be, and then and there the Defendant, Mack Gray, negligently drove or operated a motor vehicle and then and there the Defendant, Mack Gray, negligently drove an automobile into or upon or against the said automobile in which the Plaintiff was a passenger; and by reason thereof and as a proximate result and consequence thereof, the Plaintiff received severe and painful personal injuries, in that, to-wit:

The Plaintiff, Nathaniel Edmond, received severe and painful personal injuries to his face, head, legs and right knee; Plaintiff suffered abrasions and contusions of the face, head, legs and other parts of his body; Plaintiff was made sick, sore and lame; Plaintiff was caused to suffer great mental anguish and physical pain and continues to have great pain.

Plaintiff received cuts on his head; Plaintiff suffered a fracture of the right knee; Plaintiff was painfully and permanently injured and disabled; Plaintiff's leg was in a cast twenty-nine (29) days; Plaintiff was caused to spend six (6) days in the hospital.

And Plaintiff avers that his aforesaid injuries and damages were proximately caused by reason of and in consequence of the aforesaid negligence of the Defendant, Mack Gray.

BY:

Edmond Hildreth
Attorney for Plaintiff.

Plaintiff requests a trial by jury of the issues involved in this cause.

BY:

Edmond Hildreth
Attorney for Plaintiff.

FILED

DEC 16 1966

ALICE L. DUCK, CLERK
REGISTER

Executed 12-19-66
Taylor Wilkins sh.
W. A. Tolbert P.S.

7315

Nathaniel Edmond,
Pltf.

vs.

Mack Gray,
Def't

Summons & Complaint

Emmett H. Idreth

Received 16 day of Dec 1966
and on 19 day of Dec 1966
I served a copy of the within Plt
on Mack Gray

By service on _____

TAYLOR WILKINS, Sheriff
By W. A. Tolbert D. S.
Lottie

Sheriff claims 40 miles at
Ten Cents per mile Total \$ 4.00
TAYLOR WILKINS, Sheriff
BY W. A. Tolbert
DEPUTY SHERIFF

FILED

DEC 16 1966

RECEIVED
CLERK OF DISTRICT COURT
JAN 2 1967