

CHARLES R. PEACOCK,	)	
	)	IN THE CIRCUIT COURT OF
Plaintiff,	)	
vs.	)	BALDWIN COUNTY, ALABAMA
WALTER M. WHITE,	)	
	)	LAW SIDE.
Defendant.	)	7564

COUNT ONE:

The Plaintiff claims of the Defendant the sum of THREE THOUSAND DOLLARS (\$3,000.00) as damages for that heretofore on, to-wit, the 20th day of December, 1966, the wife of the Plaintiff was operating the Plaintiff's automobile on, to-wit, Alabama Highway Number 59, a public highway in Baldwin County, Alabama, and also known as the Bay Minette to Stockton Highway, at its intersection with an unnamed dirt road, said intersection being approximately 1.7 miles North of the Baldwin County Courthouse in Bay Minette, Alabama, and .3 miles South of the intersection of said Highway Number 59 with Baldwin County Road No. 47, the Bethel Baptist Church being located in the Northwest corner of said intersection, and at said time and place, the Defendant so negligently caused or allowed the vehicle which he was then and there operating to collide with the vehicle in which Plaintiff's wife was operating as aforesaid, and as a proximate consequence of said negligence thereof, Plaintiff's wife was injured and Plaintiff was caused to expend large sums of money for doctor's bill, for dentist's bill, hospital treatment, medical attention and medical supplies in and about the healing of the injuries which his wife received, and will probably have to incur further expenses in the future, and Plaintiff lost and continues to lose the society, consortium and services of his said wife, for all of which he claims damages, hence this suit.

COUNT TWO:

The Plaintiff claims of the Defendant the sum of THREE THOUSAND DOLLARS (\$3,000.00) as damages for that heretofore on, to-wit, the 20th day of December, 1966, the wife of the Plaintiff

was operating the Plaintiff's automobile, on, to-wit, Alabama Highway Number 59, a public highway in Baldwin County, Alabama, and also known as the Bay Minette to Stockton Highway, at its intersection with an unnamed dirt road, said intersection being approximately 1.7 miles North of the Baldwin County Courthouse in Bay Minette, Alabama, and .3 miles South of the intersection of said Highway Number 59 with Baldwin County Road No. 47, the Bethel Baptist Church being located in the Northwest corner of said intersection, and at said time and place, the Defendant so negligently caused or allowed the vehicle which he was then and there operating to collide with the vehicle which Plaintiff's wife was operating as aforesaid, and as a proximate consequence of said negligence aforesaid, Plaintiff's automobile was damaged in that the entire front section of said automobile was bent, broken, wrecked and damaged; the frame of said automobile was bent, twisted, broken and knocked out of alignment; that the Plaintiff used said automobile in and about the conduct of his business and that Plaintiff lost the use of said automobile for a period of six weeks, all to his great damage, hence this suit.

OWENS AND PATTON

By:

Walter S. Patton  
Attorneys for Plaintiff.

Plaintiff demands a trial of  
this cause by a Jury.

Walter S. Patton  
Attorneys for Plaintiff.

FILED  
JUN 9 1962

ALICE A. WICK, CLERK  
REGISTERED

SUMMONS AND COMPLAINT

MOORE PRINTING CO., 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 .....WALTER M. WHITE.....  
.....106 VINES STREET.....  
.....BAY MINETTE, ALABAMA.....  
.....

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.....

.....WALTER M. WHITE.....

....., Defendant.....

by .....CHARLES R. PEACOCK.....

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

Witness my hand this.....9th.....day of.....JUNE.....19..67..

*Executed 6-13-67  
Taylor Williams Sh  
W.A. Tolbert D.S.*

*Alice D. Luck*....., Clerk

No. 7564

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

CHARLES R. PEACOCK

Plaintiffs

vs.

WALTER M. WHITE

Defendants

SUMMONS AND COMPLAINT

Filed JUNE 9th 1967

Clerk

OWENS AND PATTON

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

106 VINES STREET

BAY MINETTE ALABAMA

Received In Office

JUN 9 1967

TAYLOR WILKINS

Sheriff

I have executed this summons

this 6-13 1967

by leaving a copy with

Walter M. White

Taylor Wilkins  
Sheriff

W. A. Talbot  
Deputy Sheriff

CHARLES R. PEACOCK,  
  
Plaintiff  
  
vs.  
  
WALTER M. WHITE,  
  
Defendant.

X  
X  
X  
X  
X  
X  
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
LAW SIDE  
CASE NUMBER 7564

PLEAS

Comes now the Defendant and for answer to the Complaint heretofore filed against him and to each count thereof, separately and severally, says as follows:

(1) Not guilty.

(2) That the wife of the Plaintiff was guilty of negligence which proximately contributed to her alleged injuries and damages in that she so negligently operated a motor vehicle at said time and place as to cause or allow the same to run into, upon or against the automobile being then and there operated by the Defendant; hence she should not recover.

Respectfully submitted,

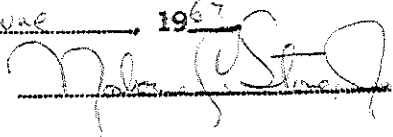
CHASON, STONE & CHASON

By:

  
Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading has been served upon counsel for all parties to this proceeding, by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 17 day of June, 1967.



FILED  
JUN 22 1967  
ALICE L. DICK, CLERK  
REGISTERED

CHARLES R. PEACOCK,

Plaintiff,

vs.

WALTER M. WHITE,

Defendant.

\* \* \* \* \*

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE            NO. 7564

\* \* \* \* \*

PLEAS

\* \* \* \* \*

FILED

JUN 22 1967

AUG 11 1967

CHASON, STONE & CHASON  
ATTORNEYS AT LAW  
P. O. Box 120  
BAY MINETTE, ALABAMA