STATE OF ALABAMA ) \*
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Thomas E. Rider and Mary L. Guiditta 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 the same, then and there to answer the complaint of Verma N. Long.

WITNESS my hand this 2nd day of August, 1967.

alie Thuck

The defendant, Thomas E. Rider, resides at Route 1, Loxley, Alabama.

The defendant, Mary L. Guiditta, resides at 2703 Emogene Street, Mobile, Alabama.

VERMA N. LONG,

Plaintiff,

VS.

THOMAS E. RIDER and MARY L. GUIDITTA,

Defendants.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

> AT LAW 765^7

COMPLAINT

COUNT ONE

The plaintiff claims of the defendant, Thomas E. Rider, Six Hundred Dollars (\$600.00) for that heretofore on to-wit, April 7, 1967, at a point on U. S. Highway 90, .6 miles West of the limits of Loxley, in Baldwin County, Alabama, the plaintiff was operating his automobile and at said time and place the defendant, Thomas E. Rider, so negligently operated a motor vehicle as to cause it to run into, upon or against the automobile of plaintiff and as a proximate result of the negligence of the said defendant the plaintiff automobile was damaged as follows: the right front fender and left front fender was broken and damaged; the hood was bent and damaged; the left front light was broken; the front bumper and front grill

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such agent, servant or employee at said time amaplace. as ytirontus aid lo eqopa bas eail edt atagin gaites an on bas an agent, servant or employee of the defendant, Mary L. Guidittu, ge gritos ered fine mes then sand there acting as all of his damages were caused as a proximate result of the negit-Pleintiff avers that .effdomotus bies ent gairteger tuods bite Mnocked out of line and plaintiff was put to much apprente saw elidomotus and to amen't end traders the Liga anoul damaged; the left front light was broken; she front bumper and left front fender were broken and Lamaged; the hood was bent and automobile was damaged as follows: the right front fender and a'llitnialq ent loerent tiuser etamixorq a as bna llitnialq to elidomotus end tentage to noqu , othi mur of it esuso of ea servant or employee, did so negligently operate a motor vehicle acting within the line and scope of his authority as such agent, agent, servant or employee of the defendant, Mary L. Guiditta, place, the defendant, Thomas E. Hider, who was then and there an bas emit biss ta elidomotus aid gaitereqo esw Mitanisiq elidw bas , smadalA , youroo miwblad , yelvol lo adimil end to deeW aslim d. fore on to-wit, April 7, 1967, at a point on U. S. Highway 90, -otered tant rol segamab (00.0008) erallod berbauk xi2 to mus ent The plaintiff claims of the defendant, Mary L. Guiditta,

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repairing the said automobile, all to his damages aforesaid, hence

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STATE OF ALABAMA ) \*\*
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Thomas E. Rider and Mary L. Guiditta 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 the same, then and there to answer the complaint of Verma N. Long.

WITNESS my hand this and day of August, 1967.

lie V. Jeeck

The defendant, Thomas E. Rider, resides at Route 1, Loxley, Alabama.

The defendant, Mary L. Guiditta, resides at 2703 Emogene Street, Mobile, Alabama.

VERMA N. LONG,

Plaintiff.

VS.

THOMAS E. RIDER and MARY L. GUIDITTA,

Defendants.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

AT LAW 7657

COMPLAINT

COUNT ONE

The plaintiff claims of the defendant, Thomas E. Rider, Six Hundred Dollars (\$600.00) for that heretofore on to-wit, April 7, 1967, at a point on U. S. Highway 90, .6 miles West of the limits of Loxley, in Baldwin County, Alabama, the plaintiff was operating his automobile and at said time and place the defendant, Thomas E. Rider, so negligently operated a motor vehicle as to cause it to run into, upon or against the automobile of plaintiff and as a proximate result of the negligence of the said defendant the plaintiff automobile was damaged as follows: the right front fender and left front fender was broken and damaged; the hood was bent and damaged; the left front light was broken; the front bumper and front grill

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were bent and broken; the frame of the automobile was knocked out of line and plaintiff was put to much inconvenience in and about repairing the said automobile, all to his damages aforesaid, hence this suit.

# COUNT TWO

The plaintiff claims of the defendant, Mary L. Guiditta, the sum of Six Hundred Dollars (\$600.00) damages for that heretofore on to-wit, April 7, 1967, at a point on U. S. Highway 90, .6 miles West of the limits of Loxley, Baldwin County, Alabama, and while plaintiff was operating his automobile at said time and place, the defendant, Thomas E. Rider, who was then and there an agent, servant or employee of the defendant, Mary L. Guiditta, acting within the line and scope of his authority as such agent, servant or employee, did so negligently operate a motor vehicle as to cause it to run into, upon or against the automobile of plaintiff and as a proximate result thereof, the plaintiff's automobile was damaged as follows: the right front fender and left front fender were broken and damaged; the hood was bent and damaged; the left front light was broken; the front bumper and front grill were bent and broken; the frame of the automobile was knocked out of line and plaintiff was put to much inconvenience in and about repairing the said automobile. Plaintiff avers that all of his damages were caused as a proximate result of the negligence of said Thomas E. Rider, who was then and there acting as an agent, servant or employee of the defendant, Mary L. Guiditta. and who was acting within the line and scope of his authority as such agent, servant or employee at said time am place.

Attorney for Plaintiff



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RAY D. BRIDGES, Shoriff

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VERMA N. LONG,

Plaintiff,

vs:

THOMAS E. RIDER and MARY L. GUIDITTA,

Defendant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

SUMMONS & COMPLAINT

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