

JOHN V. DUCK
~~XXXXXXXXXX~~
JOHN V. DUCK
Attorney at Law

P. O. DRAWER Y - FAIRHOPE, ALASAMA

M E S S A G E

R E P L Y

TO Mrs. Alice J. Duck

Bay Minette, Ala.

DATE

DATE September 22, 1967

Re: M. F. Klass, Sr. vs. Clarence Crook
and William Brown, Jr. No. 7752

Dear Mrs. Duck:

Enclosed please find Bill of Complaint to
be filed together with copy of same and
Summons to be served.

Sincerely,

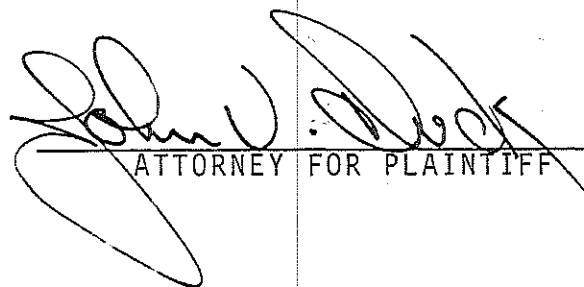
John V. Duck
(24)

SIGNED

SIGNED

M. F. KLASS, SR.,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
vs.)	AT LAW
CLARENCE CROOK and)	
WILLIAM BROWN, JR.,)	
jointly and individually,)	
Defendants.)	

Plaintiff claims of the Defendants the sum of TWO HUNDRED TWELVE (\$212.00) DOLLARS as damages for that heretofore on, to-wit: the 27th day of September, 1966, the Plaintiff was driving his automobile along and on Highway U. S. No. 90 at a point there on 2.5 miles east of the City Limits of Mobile, Alabama, which was then and there a public highway in Baldwin County, Alabama, and then and there the Defendant, WILLIAM BROWN, JR., as servant, agent or employee of the Defendant, CLARENCE CROOK, while acting within the line and scope of his authority, so negligently operated a motor vehicle as to run into, upon or against Plaintiff's automobile, and as a proximate consequence thereof, the Plaintiff's autom-obile was damaged in that: The left rear door was bent and smashed, the left rear quarter panel was bent and smashed, one wheel housing was bent and torn and had to be replaced, all to his damage as aforesaid, hence this suit.


 ATTORNEY FOR PLAINTIFF

FILED
 SEP 25 1967
 ALICE J. DUCK
 CLERK
 REGISTER

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 SummonCLARENCE CROOK and WILLIAM BROWN, JR.

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.....

.....CLARENCE CROOK and WILLIAM BROWN, JR., Defendant.....

byM. F. KLASS, SR.

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

Witness my hand this.....26.....day of.....Sept.....1967

.....Clerk

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT,

M. F. KLAS, SR.

Plaintiffs

vs.

CLARENCE CROOK and WILLIAM
BROWN, JR., jointly Defendants
and individually,

SUMMONS AND COMPLAINT

Filed **FILED** 19.....

SEP 25 1967

Clerk

ALICE J. DUCK

CLERK
REGISTER

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
Both Defendants can be served
in Bay Minette, Alabama.

Received In Office

SEP 25 1967

Sheriff

I have executed this summons

this Sept 27 1967

by leaving a copy with

Clarence Crook
William Brown Jr

Sheriff claims 8 miles at

Ten Cents per mile Total \$.80

TAYLOR WILKINS, Sheriff

BY W. A. Talbot
DEPUTY SHERIFF

Taylor Wilkins, Sheriff

W. A. Talbot, Deputy Sheriff

D. J. Talbot