

LOUIS JACKSON,	Ø	
	Ø	IN THE CIRCUIT COURT OF
Plaintiff,	Ø	BALDWIN COUNTY, ALABAMA,
VS.	Ø	AT LAW.
GEORGE C. LANGHAM, JR.,	Ø	
Defendant.	Ø	

C O M P L A I N T

COUNT ONE

The Plaintiff claims of the Defendant the sum of TEN THOUSAND (\$10,000.00) DOLLARS damages for that on to-wit, the 18th day of March, 1967, in Baldwin County, Alabama, the Plaintiff was on Baldwin County Highway Number Sixty-Four , three and seven-tenths miles west of the town limits of Loxley, Alabama, and the Defendant so negligently operated the motor vehicle in which he was driving that it struck the Plaintiff's 1950 Chevrolet station wagon and thereby and as a consequence thereof, threw the Plaintiff into a ditch, and the Plaintiff received personal injuries in this, to-wit, his right leg was broken and he was made sick, sore and lame and he is permanently injured and he suffered and continues to suffer great pain and he has lost much time from his work and is forced to incur considerable expenses for medical treatment, hospital services in and about the treatment of his injuries, for all of which he claims damages as aforesaid.

The Plaintiff avers that he received said injuries as aforesaid, as the approximate result and consequence of the negligence of the Defendant in driving said car.


ATTORNEY FOR PLAINTIFF

The Plaintiff demands a trial by jury.


ATTORNEY FOR PLAINTIFF

Defendant's address is Route 1, Loxley, Alabama.

FILED
FEB 12 1968

ALICE J. DUCK
CLERK
REGISTER

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

No. 7984

.....TERM. 1968.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon GEORGE C. LANGHAM, 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 GEORGE
C. LANGHAM, JR.,

....., Defendant.....
by LOUIS JACKSON

....., Plaintiff.....
Witness my hand this 12 day of Feb 19 68

Reice J. Luck Clerk

N.F.

No. 7984

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

LOUIS JACKSON

Plaintiffs

vs.

George C. Longhans Jr.

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

FEB 12 1968 Clerk

ALICE J. DUCK

CLERK
REGISTER

E. R. Rickorby
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED
Received in Office

FEB 12 1968 19.....

JAYLOR WILKINS
SHERIFF

Sheriff

I have executed this summons

this 19.....
by leaving a copy with

1968
Not found in my county after diligent search and inquiry.
J. R. Wilkins Sheriff
L. J. Duck Clerk
D. R. Rickorby Plaintiff's Attorney

Provj in in
Germany

Sheriff

Deputy Sheriff

Our File No. ...67-128

Your File No.

LAW OFFICES
E. G. RICKARBY
35 SOUTH SECTION STREET
FAIRHOPE, ALABAMA 36532

CODE 205
Telephone: 928-9836
Mailing Address
P. O. BOX 471

February 8, 1968

700-7984

Mrs. Alice Duck
Clerk of the Circuit Court
Bay Minette, Alabama 36507

Dear Mrs. Duck:

Inre: Louis Jackson versus George C. Langham, Jr.

Enclosed find Summons & Complaint in the above styled
cause.

Please process and oblige.

Yours very truly,



EGR/jlb
Encl.
2-19-68

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, Baldwin County

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by LOUIS JACKSON

....., Plaintiff.....
Witness my hand this 12 day of Feb 19 68

Reice Jackson..... Clerk

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CLERK
REGISTER