

ROBERT L. HOWARD,	X		
Plaintiff,	X	IN THE CIRCUIT COURT OF	
	X		
vs.		BALDWIN COUNTY, ALABAMA	
	X		
MARSHALL LEE VINSON	X	AT LAW	NO: 8041
and GROVER PHILLIPI,			
	X		
Defendants.			
	X		

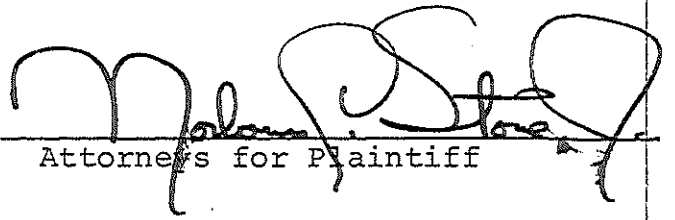
MOTION FOR JUDGMENT BY DEFAULT

Comes now the Plaintiff in the above styled cause, by his attorneys, and moves this Honorable Court to enter a Judgement by Default in favor of the Plaintiff and against the Defendants and as grounds therefor says as follows:

That the Defendants were served with a copy of the Complaint and a Summons on March 19, 1968 and they have failed to plead, answer or demur thereto since that time.

CHASON, STONE & CHASON

By:


Attorneys for Plaintiff

FILED

JUN 26 1968

ALICE J. DUCK CLERK
REGISTER

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon MARSHALL LEE VINSON and GROVER PHILLIPI 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 same, then and there to answer the Complaint of ROBERT L. HOWARD.

Witness my hand this 14 day of March, 1968.

Alice J. Luck
Clerk

ROBERT L. HOWARD,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
vs.	X	BALDWIN COUNTY, ALABAMA
MARSHALL LEE VINSON	X	AT LAW
and GROVER PHILLIPI,	X	
Defendants.	X	8041
	X	

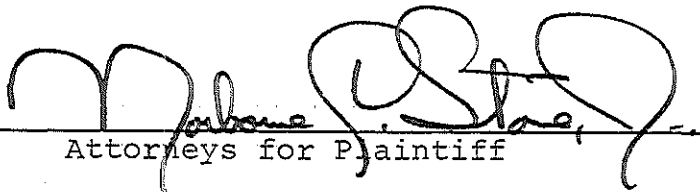
COUNT ONE:

The Plaintiff claims of the Defendants Five Hundred Dollars (\$500.00) damages for that on heretofore, to-wit: The second day of December, 1967, the Defendant Marshall Lee Vinson, who was then and there acting as the agent, servant or employee of the Defendant Grover Phillipi, so negligently operated a motor vehicle on U.S. Highway 31 at a point approximately three-fourths of a mile South of the city limits of Bay Minette in Baldwin County, Alabama, as to cause or allow the same to run into, upon and against an automobile of the Plaintiff being then and there

operated by his wife, Ione C. Howard, and as a proximate consequence and result of the negligence of the Defendant Marshall Lee Vinson aforesaid, while acting within the line and scope of his employment as the agent, servant or employee of the Defendant Grover Phillipi, the automobile of the Plaintiff was damaged in this: The right front fender was bent, the right running board assembly was bent and broken, the hood was bent and broken, the right headlights were bent and broken, the grill was bent and broken, the windshield was broken, the steering wheel was broken and the automobile was otherwise bent, broken and damaged, all to the damage of the Plaintiff, wherefore he brings this suit and asks judgment in the above amount.

CHASON, STONE & CHASON

By:


Attorneys for Plaintiff

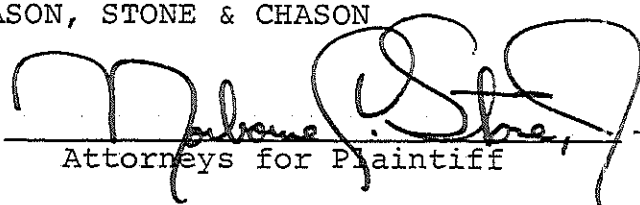
The Plaintiff demands a
trial of this cause by a
jury.

FILED

MAR 14 1968

CHASON, STONE & CHASON

By:


Attorneys for Plaintiff

ALICE J. DUCK

CLERK
REGISTER

8041

Received 15 day of March 1968
and on 15 day of March 1968
I served a copy of the within Ave
on Marshall Lee Vinson;
Grover Phillipi

TAYLOR WILKINS, Sheriff
WA Talbot
White house Fork
and Rahon

Sheriff claims 37.5 miles at
Ten Cents per mile Total \$ 3.20
TAYLOR WILKINS, Sheriff
BY Talbot
DEPUTY SHERIFF

We, the jury, find for the
Plaintiff and assess his
damages at \$ 400.00
As Foreman

ROBERT L. HOWARD,

Plaintiff,

vs.

MARSHALL LEE VINSON
and GROVER PHILLIPI,

Defendants.

* * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

* * * * *

SUMMONS AND COMPLAINT

FILED

* * * * * MAR 14 1968 * * * * *

ALICE J. DUCK CLERK
REGISTER

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