

STATE OF ALABAMA )  
\*  
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Andrew J. Hoover 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 Wilmer Lipscomb.

WITNESS my hand this 21st day of March, 1968.

Alice J. Lipscomb  
Clerk

The defendant resides in Foley, Alabama.

\* \* \* \* \*

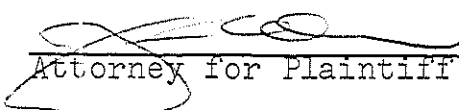
WILMER LIPSCOMB,	)	
	)	
Plaintiff,	)	IN THE CIRCUIT COURT OF
	)	
VS.	)	BALDWIN COUNTY, ALABAMA
	)	
ANDREW J. HOOVER,	)	AT LAW
	)	8055
Defendant.	)	

C O M P L A I N T

COUNT ONE

The plaintiff claims of the defendant the sum of One Thousand Dollars (\$1,000.00) for that heretofore on to-wit, March 24, 1967, at a point on U. S. Highway 98, which is 2.4 miles West of the City Limits of Foley in Baldwin County, Alabama, and which is at a point where U. S. Highway 98 intersects the cemetery road, the defendant so negligently operated a motor vehicle so as to cause it to run into, upon or against the automobile of plaintiff which was being operated at said time by his wife, Velma Lipscomb, and which was on said U. S. Highway 98 at a place where it had a right to be, and as a proximate result of the negligence of the said defendant, plaintiff's automobile was damaged as follows: the left one-fourth panel, wheel base assembly, trunk floor pan, rear body panel, trunk lid, rear bumper, rear frame section, frame,

upper floor pan of trunk compartment, front seat and left rear tire were all bent, broken and damaged and plaintiff was forced to much inconvenience in and about having his automobile repaired and was without the use of his said automobile for approximately ten days. Plaintiff avers that all of his damages were the proximate result of the negligence of the defendant at said time and place, hence this suit.

  
Attorney for Plaintiff

**FILED**

MAR 21 1968

**ALICE J. DUCK** CLERK  
REGISTER

CASE NO. 8055

WILMER LIPSCOMB,  
Plaintiff,

vs;

ANDREW J. HOOVER,  
Defendant.

SUMMONS & COMPLAINT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

James R. Owen, Attorney

Received 21 day of March 1948  
and on 26 day of March 1948  
I served a copy of the within 29 C  
on Andrew J. Hoover  
by service on Andrew J. Hoover

TAYLOR WILKINS, Sheriff  
By M. Eastman D. J.  
Joley, Ala

TAYLOR WILKINS, SHERIFF OF BALDWIN  
COUNTY, ALABAMA, CLAY \$1.50 EACH  
FOR SERVING 1 PROCESS(ES) AND  
TRAVEL EXPENSE ON EACH OF \$ 7.20  
PROCESS(ES) OR A TOTAL OF \$ 8.20