

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 8057

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to SummonTHOMAS LEROY JOHNSON and JOHN DALE.....

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.....

THOMAS LEROY JOHNSON and JOHN DALE
....., Defendant. S.....

byLEONARD JACKSON NELSON.....
....., Plaintiff.....

Witness my hand this.....22.....day of.....March.....1968.....

Alice J. Black Clerk

No.....

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

LEONARD JACKSON NELSON

Plaintiffs

vs.

THOMAS LEROY JOHNSON AND
JOHN DALE

Defendants

SUMMONS AND COMPLAINT

Filed 19.....

Clerk

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
Thomas Leroy Johnson - Daphne, Ala
John Dale - Montrose, Ala. or at
Thomas Hospital, Fairhope, Ala.

Received In Office

..... 19.....

Sheriff

I have executed this summons

this 19.....

by leaving a copy with

Sheriff

Deputy Sheriff

LEONARD JACKSON NELSON,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
vs.)	AT LAW
THOMAS LEROY JOHNSON, and)	
JOHN DALE, jointly and)	
individually,)	
Defendants.)	

Plaintiff claims of the Defendants the sum of ONE THOUSAND SEVENTY-FOUR AND 62/100 (\$1,074.62) as damages, for that heretofore on, to-wit: the 7th day of April, 1967, when Plaintiff was operating his said automobile along U. S. Highway 98 at its intersection with Montrose County Road, which was then and there a public highway in Baldwin County, Alabama, and at the said time and place, the Defendant, THOMAS LEROY JOHNSON, as the agent, servant or employee of the Defendant, JOHN DALE, and while acting within the line and scope of his authority, so negligently operated a motor vehicle as to allow it to run into, upon or against the Plaintiff's said automobile, and as a proximate consequence thereof, Plaintiff's automobile was damaged in that the hood was bent, smashed and had to be repaired; the right door molding was bent and had to be replaced, the windshield was broken and had to be replaced, the instrument panel was bent, smashed and otherwise torn and had to be repaired, the headlights were smashed and had to be replaced, the fender was bent, smashed and otherwise torn and had to be repaired, all as a proximate consequence of the Defendant's negligence, hence this suit.


 ATTORNEY FOR PLAINTIFF

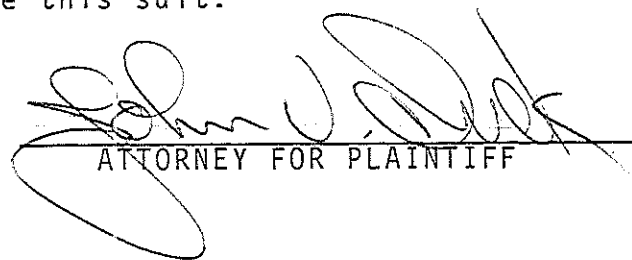
FILED

MAR 22 1968

ALICE J. DUCK CLERK
 REGISTER

LEONARD JACKSON NELSON,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
vs.)	AT LAW
THOMAS LEROY JOHNSON, and)	8057
JOHN DALE, jointly and)	
individually,)	
Defendants.)	

Plaintiff claims of the Defendants the sum of ONE THOUSAND SEVENTY-FOUR AND 62/100 (\$1,074.62) as damages, for that heretofore on, to-wit: the 7th day of April, 1967, when Plaintiff was operating his said automobile along U. S. Highway 98 at its intersection with Montrose County Road, which was then and there a public highway in Baldwin County, Alabama, and at the said time and place, the Defendant, THOMAS LEROY JOHNSON, as the agent, servant or employee of the Defendant, JOHN DALE, and while acting within the line and scope of his authority, so negligently operated a motor vehicle as to allow it to run into, upon or against the Plaintiff's said automobile, and as a proximate consequence thereof, Plaintiff's automobile was damaged in that the hood was bent, smashed and had to be repaired; the right door molding was bent and had to be replaced, the windshield was broken and had to be replaced, the instrument panel was bent, smashed and otherwise torn and had to be repaired, the headlights were smashed and had to be replaced, the fender was bent, smashed and otherwise torn and had to be repaired, all as a proximate consequence of the Defendant's negligence, hence this suit.


 ATTORNEY FOR PLAINTIFF

FILED

MAR 22 1968

ALICE J. DUCK CLERK
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STATE OF ALABAMA
Baldwin County

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byLEONARD JACKSON NELSON.....

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

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Baldwin County

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ALICE J. DUCK

CLERK
REGISTER

TAYLOR WILKINS, SHERIFF OF BALDWIN

COUNTY, ALABAMA, CLAIM \$1.50 EACH

FOR SERVING 1 PROCESS(ES) AND

TRAVEL EXPENSE ON EACH OF \$ 5.40

PROCESS JOHN V. TO DUCK \$ 6.90

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Thomas Leroy Johnson - Daphne, Ala
John Dale - Montrose, Ala. or at
Thomas Hospital, Fairhope, Ala.

Received In Office

RECEIVED

MAR 22 1968

TAYLOR WILKINS

I have executed this summons

this 19.....

by leaving a copy with

Thomas Leroy
Johnson 4-23-68
Daphne 54
John Dale
In Army

Returned 26 day of April 1968

Not found in my county after diligent search and

guilty as to John Dale

Taylor Wilkins, Sheriff

By Randall Deputy Sheriff

Taylor Wilkins, Sheriff

Roy Randall Deputy Sheriff

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