

CLARENCE L. CREAMER,

Plaintiff,

VS.

MATTHEW LADD,

Defendant.

X

X

X

X

X

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW.

CASE NO. 8089

Comes E. G. Rickarby and respectfully requests that he be allowed to withdraw his name as appearing for the Defendant in this cause.

Notice of this withdrawal has been made to the Defendant.



E. G. Rickarby,  
Solicitor for Defendant.

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 GLOSTON LUVERNE LADD and MATTHEW LADD 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 CLARENCE L. CREAMER.

Witness my hand this 15<sup>th</sup> day of April, 1968.

Calice R. Alcock  
Clerk

CLARENCE L. CREAMER,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
vs.	X	BALDWIN COUNTY, ALABAMA
GLOSTON LUVERNE LADD and	X	AT LAW
MATTHEW LADD,	X	CASE NO. <u>8089</u>
Defendants.	X	

The Plaintiff claims of the Defendants the sum of Three Hundred and Fifty Dollars (\$350.00) as damages for that heretofore on, to-wit: the 4th day of November, 1967 at approximately 6:45 P. M. at a point on Greeno Road near Fairhope, Baldwin County, Alabama, the Defendant Gloston Luverne Ladd who was then and there the agent, servant or employee of the Defendant Matthew Ladd and as such acting within the line and scope of his authority, so negligently operated an automobile as to cause or allow the same to collide with the automobile of the Plaintiff and as a proximate result of such negligence the Plaintiff's automobile was damaged in that the left front fender, left front headlight, the entire

left side, the hood and the front bumper, grill and radiator were bent, damaged or broken in the sum above mentioned, hence this suit.

CHASON, STONE & CHASON

By: John Earle Chason  
Attorneys for Plaintiff

**FILED**

APR 15 1968

**ALICE J. DUCK** CLERK  
REGISTER

8089

CLARENCE L. CREAMER,

Plaintiff,

vs.

GLOSTON LUVERNE LADD and  
MATTHEW LADD,

Box 287 FAIRHOPE, Ala

Defendants.

Received 15 day of April 1968  
and on 16 day of April 1968  
I served a copy of the within D & C  
on Glostons Luverne Ladd  
Matthew Ladd  
By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff

By W. C. Garner D. A.

F hope

TAYLOR WILKINS, SHERIFF OF BALDWIN  
COUNTY, ALABAMA, CLAIM \$1.50 EACH

FOR SERVING 2 PROCESS(ES) AND

TRAVEL EXPENSE ON EACH OF \$ 14.00

PROCESS(ES) OR A TOTAL OF \$ 17.00

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. \_\_\_\_\_

SUMMONS AND COMPLAINT

**FILED**

APR 15 1968

**ALICE J. DUCK** CLERK  
REGISTER

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