

JOHN V. DUCK  
Attorney at Law  
P. O. DRAWER Y - FAIRHOPE, ALABAMA

M E S S A G E

R E P L Y

TO Mrs. Alice J. Duck  
Bay Minette, Ala.

DATE May 13, 1968

Re: James Donald Goram vs. Curtis Reid  
Vernon.

Dear Mrs. Duck:

Enclosed please find Bill of Complaint  
to be filed together with copy of same  
and Summons to be served.

Sincerely,

SIGNED

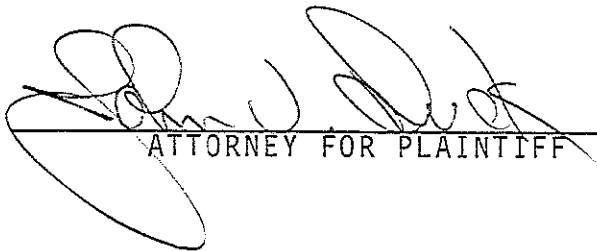
SIGNED

JAMES DONALD GORAM, )  
Plaintiff, )  
vs. )  
CURTIS REID VERNON, )  
Defendant. )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW, CASE NO. 8144

Comes now the Plaintiff in the above styled cause, and for  
answer to the Plea of Recoupment herein says:

"Not Guilty".

  
ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel  
for the opposing party in the foregoing matter with a copy  
of this pleading by depositing in the United States Mail  
a copy of same in a properly addressed envelope with  
adequate postage thereon.

This 31<sup>st</sup> day of January 1969  
Attorney for Plaintiff

FILED

FEB 3 1969

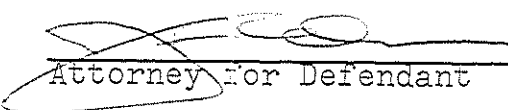
  
ALICE J. DUSK CLERK  
REGISTER

JAMES DONALD GORAM,	)	
	)	
Plaintiff,	)	IN THE CIRCUIT COURT OF
	)	
VS.	)	BALDWIN COUNTY, ALABAMA
	)	
CURTIS REID VERNON,	)	AT LAW NO. 8144
	)	
Defendant.	)	

PLEA

Now comes the defendant in the above styled cause and for plea to the complaint heretofore filed in said cause says:

1. Not guilty.
2. Defendant says for further plea to the complaint that the plaintiff was himself guilty of negligence at the time and place complained of in said complaint, which said negligence proximately contributed to his damages because of which he cannot recover.
3. For further answer to the complaint and by way of recoupment the defendant says: Defendant claims of the plaintiff the sum of Five Hundred Dollars (\$500.00) damages for that heretofore on to-wit, September 23, 1967, the defendant was operating his motor vehicle on U. S. Highway 31, South, at its intersection with McMillan Street in Bay Minette, Alabama, which was then and there a public highway in Baldwin County, Alabama, and where the defendant had a right to be and at said time and place the plaintiff so negligently operated a motor vehicle so as to run into, upon or against the defendant's automobile and as a proximate result of the negligence of plaintiff, the defendant's car was bent, broken and damaged to the defendant's damages aforesaid.

  
Attorney for Defendant

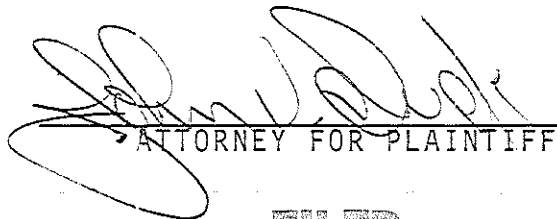
FILED

JUN 17 1968

ALICE J. CLARK CLERK  
REGISTER

JAMES DONALD GORAM,	)	IN THE CIRCUIT COURT OF
Plaintiff,	)	BALDWIN COUNTY, ALABAMA
vs.	)	AT LAW
CURTIS REID VERNON,	)	8144
Defendant.	)	

Plaintiff claims of the Defendant the sum of FOUR HUNDRED EIGHTY-SIX AND 27/100 (\$486.27) DOLLARS due from him for damages for that, heretofore on, to-wit: the 23rd day of September, 1967, the Plaintiff was operating his motor vehicle on Highway No. U.S. 31 South, at its intersection with McMillan Street in Bay Minette, Alabama, which was then and there a public highway in Baldwin County, Alabama, and where the Plaintiff had a right to be, the Defendant no negligently operated a said motor vehicle as to run into, upon or against the Plaintiff's said motor vehicle, and as a proximate result of said negligence on the part of the Defendant as aforesaid, the Plaintiff's car was damaged in that the frame was bent, the right front bumper was bent, smashed and otherwise torn, the right front fender was bent, smashed and had to be repaired, the right front light was broken and had to be replaced, the right front door was bent, smashed and torn and had to be repaired, and that the Plaintiff's said automobile was otherwise bent, smashed, torn and had to be repaired, all to the Plaintiff's damage as aforesaid, hence this suit.

  
 ATTORNEY FOR PLAINTIFF

FILED

MAY 15 1968

ALICE J. BUCK CLERK  
 REGISTER

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA  
Baldwin County

Circuit Court, Baldwin County

No. 8144

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon .....CURTIS REID VERNON.....

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.....

.....CURTIS REID VERNON....., Defendant.....

by .....JAMES DONALD GORAM.....

.....Plaintiff.....

Witness my hand this.....15.....day of.....May.....1968

Cliff D. Duck Clerk

Ex, 5-21-68

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No. 8144

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

.....JAMES..DONALD..GORAM.....

Plaintiffs

vs.

.....CURTIS REID VERNON.....

Defendants

SUMMONS AND COMPLAINT

Filed ..... MAY 15 1968 ..... 19.....

ALICE J. DUCK

Clerk  
REGISTER

.....JOHN V. DUCK.....

Plaintiff's Attorney

.....  
Defendant's Attorney

Defendant lives at

Rt. 1, Box 516  
Bay Minette, Alabama

Received In Office

..... 19.....  
MAY 15 1968

Sheriff

I have executed this summons

this May 21 1968  
by leaving a copy with

Curtis Reed Vernon

TAYLOR WILKINS, SHERIFF OF BALDWIN  
COUNTY, ALABAMA, CLAIM \$1.50 EACH  
FOR SERVING 1 PROCESS(ES) AND  
TRAVEL EXPENSE ON EACH OF \$ 80  
PROCESS(ES) OR A TOTAL OF \$ 2.30

Taylor Wilkins Sheriff  
W. A. Talbot Deputy Sheriff

4 miles South of Bay  
8 mi