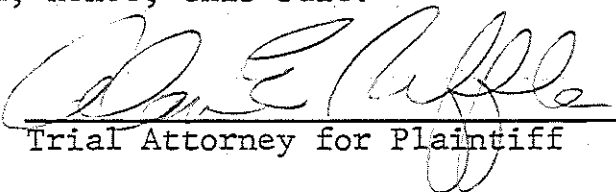


JOHN C. GLOVER, : IN THE CIRCUIT COURT OF
Plaintiff, : BALDWIN COUNTY, ALABAMA
vs. : AT LAW
NOAH ALEX WALDROP, :
Defendant. : CASE NO. 8197

Plaintiff claims of the defendant SEVEN HUNDRED FIFTY
AND NO/100 (\$750.00) DOLLARS, as damages, for that on, to-
wit, May 12, 1968, the defendant, Noah Alex Waldrop, so
negligently drove a motor vehicle onto U.S. Highway 98,
approximately one half mile east of the city limits of
Daphne, Alabama, U.S. Highway 98 being a public road in
Baldwin County, State of Alabama, so as to cause or allow
said motor vehicle to collide with the motor vehicle owned
by the plaintiff which was then being operated on said U.S.
Highway 98, approximately one half mile east of the city
limits of Daphne, Alabama, and as a direct and proximate
result and consequence of the aforesaid negligence of the
defendant, the motor vehicle owned by the plaintiff was
bent, broken and damaged; hence, this suit.


Trial Attorney for Plaintiff

OF COUNSEL:

HAND, ARENDALL, BEDSOLE, GREAVES & JOHNSTON

Defendant may be served at Daphne, Alabama.

Received 24 day of Jan 1968
and on 27 day of Jan 1968
I served a copy of the within 29 C
on Noah Alford
By service on Alford
Dash
TAYLOR WILKINS, Sheriff
By Roy Randal

TAYLOR WILKINS, SHERIFF OF BALDWIN
COUNTY, ALABAMA, CLAIM \$1.50 EACH
FOR SERVING 150 PROCESS(ES) AND
TRAVEL EXPENSE ON EACH OF \$ 5.40
PROCESS(ES) OR A TOTAL OF \$ 690

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA

Baldwin County

Circuit Court, Baldwin County

No. 8197

TERM. 19.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

Noah Alex Waldrop

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.

Noah Alex Waldrop

Defendant.

by John C. Glover

Plaintiff.

Witness my hand this 28 day of June 1968.

Alice J. Duck Clerk

E4 1-27-69

VOL

61 PAGE 283

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

JOHN C. GLOVER

Plaintiffs

vs.

NOAH ALEX WALDROP

Defendants

SUMMONS AND COMPLAINT

FILED

Filed JUN 28 1968 19.....

ALICE J. DICK

CLERK
REGISTER

Clerk

Hand, Arendall, Bedsole, Greaves & Johnstone

Plaintiff's Attorney

Defendant's Attorney

RECEIVED

Defendant lives at
JAN 24 1969

RECEIVED

Received in Office

JUN 28 1968
OCT 12 1968WILSON WILKIN
SHERIFF

19.....

Sheriff

I have executed this summons

this 19.....

by leaving a copy with

Noted by Waldrop
(In District at this time)
This is expected
to be
(Ravell)
(Withhold Petition)
10-16-68

Sheriff

Deputy Sheriff

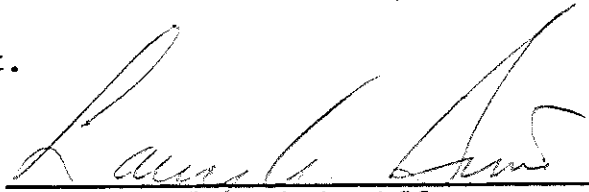
JOHN C. GLOVER,	§	IN THE CIRCUIT COURT OF
Plaintiff,	§	BALDWIN COUNTY, ALABAMA
VS.	§	AT LAW
NOAH ALEX WALDROP,	§	
Defendant.	§	CASE NO. 8197

AMENDED COMPLAINT

Comes now the plaintiff and amends the complaint previously filed herein so that it now reads as follows:

COUNT ONE

Plaintiff claims of the defendant SEVEN HUNDRED FIFTY AND NO/100 (\$750.00) DOLLARS, as damages, for that heretofore on, to-wit, December 1, 1967, the defendant Noah Alex Waldrop, so negligently operated a motor vehicle on U. S. Highway 98 approximately one-half mile east of the city limits of Daphne, Alabama, said highway being a public highway in Baldwin County, Alabama, so as to cause or allow said motor vehicle to collide with the motor vehicle operated by the plaintiff at said place and time and as a direct and proximate result and consequence of the negligence as aforesaid, the plaintiff's motor vehicle was bent, broken and damaged; hence, this suit.


Attorney for Plaintiff

Of Counsel:

HAND, ARENDALL, BEDSOLE, GREAVES AND JOHNSTON

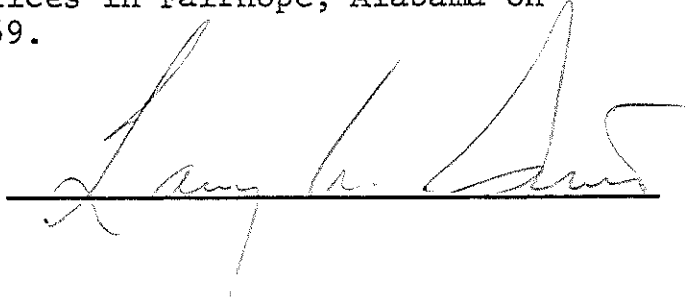
FILED

MAY 1 1969

ALICE J. DUCK
CLERK
REGISTER

CERTIFICATE OF SERVICE

I hereby certify that I have mailed a true and correct copy of the foregoing Amended Complaint to Phyllis S. Nesbit, Esquire, attorney for defendant, by depositing a copy of same in the United States mail, postage prepaid, addressed to said attorney at her offices in Fairhope, Alabama on this 20th day of April, 1969.



JOHN C. GLOVER,

Plaintiff

VS.

NOAH ALEX WALDROP

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE No. 8197

COUNT I.

The Defendant, for answer to the complaint, saith: That the accident on which the Complainant's Bill of Complaint is based occurred December 1, 1967 and the complaint is barred by the Statute of Limitations of 1 year.

WILTERS, BRANTLEY & NESBIT

BY:

Phyllis S. Nesbit
Attorney for Defendant

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 12 day of February 1969 served a copy of the foregoing pleading on counsel for all parties to this proceeding by mailing the same by United States Mail, properly addressed, and first class postage prepaid.

WILTERS, BRANTLEY & NESBIT

By:

Phyllis S. Nesbit

FILED

FEB 12 1969

ALICE J. DUCK

CLERK
REGISTER