STATE OF ALABAMA ) \*\*
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Peterson Produce
Company, Inc., a corporation, and Carl Ray Coleman 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 Merrill K. Deakle.

WITNESS my hand this \_\_\_\_ day of Jung, 1968.

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The address of Peterson Produce Company is Summerdale, Alabama, and the address of Carl Ray Coleman is General Delivery, Foley, Alabama.

MERRILL K. DEAKLE,

Plaintiff,

VS.

PETERSON PRODUCE COMPANY, INC., a corporation, and CARL RAY COLEMAN,

Defendants.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW 8/99

COMPLAINT

COUNT ONE

The plaintiff claims of the defendants TWO HUNDRED TWENTY-FIVE DOLLARS (\$225.00) for that heretofore on to-wit, November 28, 1967, on U. S. Highway 31 at a point where the said highway intersects with the West side of Courthouse Square in Bay Minette, Baldwin County, Alabama, the plaintiff's automobile was being driven along said highway at a place where it had a right to be and at said time and place the defendant, Carl Ray Coleman, who was then and there an agent, servant or employee of the defendant, Peterson Produce Company, Inc., a corporation, acting within the line and scope of his authority as such agent, servant or employee, so negligently operated a motor vehicle so as to cause it to run into, upon or against the automobile of the plaintiff and as a proximate

result of the negligence of the said defendant, the plaintiff's automobile was damaged as follows: the left front and the left fender and left side of plaintiff's automobile were bent, broken and damaged. Plaintiff avers that all of his damages were the proximate result of the negligence of the defendant, Carl Ray Coleman, who was then and there an agent, servant or employee of the defendant, Peterson Produce Company, Inc., a corporation, acting within the line and scope of his authority as such agent, servant or employee, hence this suit.

Attorney for Plaintiff



JUL 1 1968

ALGE J. DUCK REGISTER

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Service on latenate Classes

Taylor Wilkins, Sheriff

By H. J. S. D. S. Paterson Produce Co.

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JUL 1-1968

ALUE J. DUCK CLERK REGISTER

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TAYLOR WILKINS, Sheriff

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