TOWN OF ROBERTSDALE,
A Municipal Corporation,

Plaintiff,

VS.

BALDWIN COUNTY, ALABAMA

EDWARD HENRY KANE, JR.,

Defendant.

AT LAW
NO. 8327

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.

J. B. BLACKBURN and JAMES R. OWEN

By Attorneys for Defendant

FILED

__SEP 30 1968

ALGE J. DUCK CLERK REGISTER

TOWN OF ROBERTSDALE, A Municipal Corporation,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
EDWARD HENRY KANE, JR.,)	LAW SIDE.
Defendant.)	832/

The Plaintiff claims of the Defendant the sum of FIVE HUNDRED AND NO/100 DOLLARS (\$500.00) as damages for that heretofore, on, to-wit, July 21, 1968, at or about 6:00 o'clock P. M., the motor vehicle of the Plaintiff was being operated in the Town of Robertsdale, Alabama, on Milwaukee Street, a public road in Baldwin County, Alabama, at a point thereon in front of the United States Post Office of Robertsdale, Alabama, and at said time and said place, the Defendant so negligently operated his motor vehicle so as to cause or allow the same to run into, upon or against the automobile of the Plaintiff, and as a proximate consequence thereof, the Plaintiff's motor vehicle, a 1966 Chevrolet, was bent, torn and damaged in that the left front fender, the left front panel, radiator and head lights were bent and broken, hence this suit.

OWENS AND PATTON

Attorneys for Plaintiff.

SEP 1 9 1968

ALIGE J. DUCK CLERK REGISTER

Circuit Court, Baldwin County OF ALABAMA STATE No. 8327 Baldwin County TERM. 19..... TO ANY SHERIFF OF THE STATE OF ALABAMA: You Are Hereby Commanded to Summon HENRY EDWARD KANE, JR. ROBERTSDALE, ALABAMA 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..... HENRY EDWARD KANE, JR. TOWN OF ROBERTSDALE, a Municipal Corporation day of September Witness my hand this....

₹9-19-6

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No. 2327 Page	
STATE OF ALABAMA	Defendant lives at
Baldwin County	ROBERTSDALE ALABAMA
CIRCUIT COURT	Reseived In 1968
TOWN OF ROBERTSDALE, a	MANAGE WILKING 19
municipal corporation,	Sheriff
Plaintiffs	I have executed this summons
EDWARD vs.	this 19-8
HENRY KANE, JR.	by leaving a copy with
Defendants	
	Educard Henry Bans
SUMMONS AND COMPLAINT	
Filed SIPPLE IDR 18 1968	
SEP 1 9 1968 Clerk	month placed - 50 miles it
ALUE J. DUCK CLERK REGISTER	Ton Casta our mile Total & Sentition of Children Stranger
OWENS AND PATTON	
Plaintiff's Attorney (March Sheriff
Defendant's Attorney	Weel Land Deputy Sheriff
,	RIFICE