STATE OF ALABAMA )
\*
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Russell H. Green and Larry Byrd 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 Joseph L. Clark.

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

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The address of the defendant, Russell H. Green is 206 Byrm Street, Bay Minette. The address of the defendant, Larry Byrd, is General Delivery, Bay Minette.

JOSEPH L. CLARK,

Plaintiff,

VS.

RUSSELL H. GREEN and LARRY BYRD,

Defendants.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

AT LAW

## COMPLAINT

## COUNT ONE

Plaintiff claims of the defendants One Hundred Seventyfive Dollars (\$175.00) for that heretofore on to-wit, January 14,
1968, at a point on Byrne Street in Bay Minette, Alabama, approximately 150 feet South of the intersection of Byrne Street and South
Street, the defendant, Larry Byrd, who was then and there an agent,
servant or employee of the defendant, Russell H. Green, acting
within the line and scope of his authority as such agent, servant
or employee so negligently operated an automobile so as to cause
it to run into, upon or against the automobile of plaintiff and
as a proximate result of the negligence of the said defendant,
Larry Byrd, the plaintiff's automobile was bent, broken and damaged;
the front bumper, right front fender molding right front hub cap

and disc, the right front wheel molding and the right front door was bent, broken and damaged; plaintiff was put to much trouble and inconvenience in and about having his automobile repaired; he was caused to be without the use of his automobile for a long period of time, all to his damages aforesaid. Plaintiff avers that all of his injuries and damages were caused as a proximate result of the negligence of the defendant, Larry Byrd, at said time and place, who was at said time and place an agent, servant or employee of the defendant, Russell H. Green, acting within the line and scope of his authority as such agent, servant or employee.

Attorney for Plaintiff

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Sheriff claims\_\_

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