

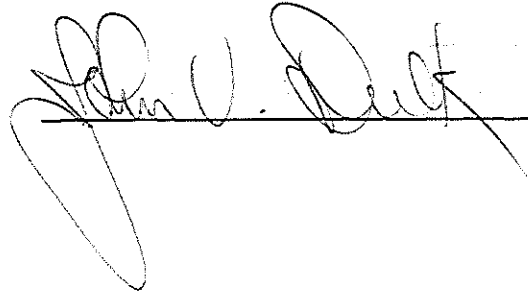
THOMAS S. JONES,)	IN THE CIRCUIT COURT OF
Plaintiff,)	BALDWIN COUNTY, ALABAMA
vs.)	AT LAW
WALTER STYRON and)	8513
CLARENCE BROAD, jointly)	
and individually,)	
Defendants.)	

COUNT ONE

Plaintiff claims of the Defendants the sum of FIVE THOUSAND (\$5,000.00) DOLLARS as damages, for that heretofore on, to-wit: the 20th day of October, 1968, the Plaintiff was operating his motor vehicle on a public highway, to-wit: U. S. Highway No. 90 at a point thereon at its intersection with driveway of Trailway Truck Stop, which was then and there a public highway in Baldwin County, Alabama where he had a right to be, and WALTER STYRON, an agent, servant or employee of the Defendant, CLARENCE BROAD, while acting within the line and scope of his employment, so negligently operated his motor vehicle, to-wit: one 1955 Dodge Sedan, as to cause the said motor vehicle to run into, upon or against the motor vehicle of the Plaintiff, and the Plaintiff avers that as a proximate consequence thereof he was injured severely in that he received a severe cut on his left leg, he was bruised about the head and his ribs, that the cartilage was pulled from his ribs, that he was caused to spend large sums of money in and about the treatment of his injuries for doctors, x-rays and hospitals, that he was caused to lose some time from his employment, that he suffered great pain and mental anguish, and will continue to suffer great pain and mental anguish.

Plaintiff further avers that due to the Defendant's negligence as aforesaid, Plaintiff's motor vehicle was damaged in that the right front of his automobile was bent, smashed, torn and otherwise damaged, that the grill and radiator were smashed and had to be replaced; that two headlamps were broken and had to be replaced,

that the hood was bent and smashed and had to be repaired, that his motor vehicle was otherwise bent, smashed and torn, all as a result of the negligence of the Defendant as aforesaid, hence this suit.

A handwritten signature in dark ink, appearing to read "Alice J. Duck", is written over a horizontal line.

FILED

JAN 15 1969

ALICE J. DUCK CLERK
REGISTER

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No.

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon WALTER STYRON and CLARENCE BROAD

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.....

WALTER STYRON and CLARENCE BROAD

Defendant.....

by THOMAS S. JONES

Plaintiff.....

Witness my hand this.....

15

day of

1969

[Signature]
Clerk

VOL

61 PAGE 603

24-1-22-69

ORIGINAL

No. 8513 Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

THOMAS S. JONES

Plaintiffs

vs.

WALTER STYRON and CLARENCE
BROAD, jointly and Defendants
individually,

SUMMONS AND COMPLAINT

FILED

Filed 19.....

JAN 15 1969

Clerk

ALICE J. DUCK

CLERK
REGISTER

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
Walter Styron-Box 502 Turner St.
Bay Minette, Ala. & is employed at
Standard Furniture Company
Clarence Broad-Bay Minette, Ala.

Received In Office

RECEIVED

19.....

JAN 15 1969 Sheriff

I have executed this summons

this Jan 22 1969

by leaving a copy with

Walter Styron
Clarence Broad

Sheriff claims 7 miles at

Ten Cents per mile Total \$ 70

TAYLOR WILKINS, Sheriff

BY

DEPUTY SHERIFF

Taylor Wilkins Sheriff

H. J. Brown Deputy Sheriff

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 8513

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

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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.....

.....WALTER STYRON and CLARENCE BROAD..... Defendant.....

byTHOMAS S. JONES.....

..... Plaintiff.....

Witness my hand this 15 day of May 1969

Alice J. Clark Clerk

No.....

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

.....THOMAS S. JONES.....

Plaintiffs

vs.

.....WALTER STYRON and CLARENCE
BROAD, jointly and Defendants
individually.....

SUMMONS AND COMPLAINT

Filed 19.....

Clerk

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

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
Walter Styron-Box 502 Turner St.
Bay Minette, Ala. & is employed at
Standard Furniture Company
Clarence Broad-Bay Minette, Ala.

Received In Office

RECEIVED

19.....

JAN 15 1960

Sheriff

I have executed this summons

this 22 Jan. 1960

by leaving a copy with

Clarence Broad.
at Minnie Lee St.
5 miles Round Trip

Taylor Wilkins Sheriff

H. B. 2000 Deputy Sheriff

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County
No. 8513

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to SummonWALTER STYRON and CLARENCE BROAD.....

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.....

.....WALTER STYRON and CLARENCE BROAD....., Defendant.....

byTHOMAS S. JONES.....

....., Plaintiff.....

Witness my hand this 15 day of Sept. 1969

Alice J. Duck, Clerk

No.

Page.

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

THOMAS S. JONES

Plaintiffs

vs.

WALTER STYRON and CLARENCE
BROAD, jointly and Defendants
individually,

SUMMONS AND COMPLAINT

Filed 19.....

Clerk

JOHN V. DUCK

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
Walter Styron-Box 502 Turner St.
Bay Minette, Ala. & is employed at
Standard Furniture Company
Clarence Broad-Bay Minette, Ala.

Received In Office

RECEIVED

19.....

JAN 15 1960

Sheriff

I have executed this summons

this 22 Jan 1960

by leaving a copy with

Walter Styron
Standard Furniture Co
2 miles Round Trip

Taylor Wilkins, Sheriff

H. L. Brown, Deputy Sheriff

THOMAS S. JONES,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
vs.	X	BALDWIN COUNTY, ALABAMA
WALTER STYRON and	X	AT LAW
CLARENCE BROAD, jointly	X	CASE NO. 8513
and individually,	X	
Defendants.	X	

Comes now the Defendant, Clarence Broad, and for answer to the Plaintiff's Bill of Complaint, says:

1.

That he is not guilty of the matters alleged therein.

WILTERS & BRANTLEY

BY: 

CERTIFICATE OF SERVICE

I do hereby certify that I have on this 11 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.

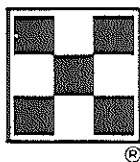
WILTERS & BRANTLEY

By: 

FILED

FEB 11 1969

ALICE J. DUCK CLERK REGISTER



THOMAS S. JONES
RALSTON PURINA COMPANY
District Salesman
P.O. Box 407, Fairhope, AL 36532
Phone 205 928-5785

July 18

Eunice Blackmon, Clerk

I just received your
notice that I owe \$38.⁵⁰
for Circuit # 8513.

I have forwarded this
on to my insurance people
who will pay you.

Thank you
Thomas Jones