## ORIGINAL.

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. g	)	

## 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.

JAN 15 1969

ALICE J. DUCK CLERK REGISTER

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CIRCUIT COURT
THOMAS S. JONES
Plaintiffs vs.
WALTER STYRON and CLARENCE BROAD, jointly and Defendants individually,
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JOHN V. DUCK
Plaintiff's Attorney

Defendant's Attorney

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

> 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

CERTIFICATE OF SERVICE

I do hereby certify that I have on this / day of Fefre 196 served a copy of the foregoing pleading on counsel for fall parties to this proceeding by mailing the same by United States Mail, properly accressed, and livst class postage prepaid.

Velle

FEB 1 1 1969

ALIGE J. DUCK REGISTER



THOMAS S. JONES

RALSTON PURINA COMPANY District Salesman P.O. Box 407, Fairhope, AL 36532

Phone 205 928-5785

July 18

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