

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Herman Tate and Alexander Tate 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 same, then and there to answer the Complaint of Norman Earls.

Witness my hand this 26 day of May,
1969.

Rene J. Louch
Clerk

NORMAN EARLS,	X	
Plaintiff,	X	IN THE CIRCUIT COURT OF
vs.	X	BALDWIN COUNTY, ALABAMA
HERMAN TATE and	X	
ALEXANDER TATE,	X	AT LAW
Defendants.	X	

The Plaintiff claims of the Defendants the sum of Four Hundred Dollars (\$400.00) as damages for that heretofore on to-wit, the 14th day of January, 1969, at a point on Daphne Road in the City of Bay Minette, Baldwin County, Alabama, the Defendant Alexander Tate, who was then and there the agent, servant or employee of the Defendant Herman Tate, and at said time and place acting within the line and scope of his authority as such agent, servant or employee, did so negligently operate a motor vehicle as to cause or allow the same to run into, upon or against a motor vehicle owned by the Plaintiff and as a proximate result of said negligence

of the Defendant the said motor vehicle of the Plaintiff was damaged in that its rear bumper, bumper guard and bumper supports together with the rear body panel, deck lid and trunk floor were all bent, damaged or broken to the damage of the Plaintiff in the sum above mentioned, hence this suit.

CHASON, STONE & CHASON

By: John S. Chason
Attorneys for Plaintiff

FILED

MAY 25 1969

ALICE J. EDDY CLERK
REGISTER

Alexander Late
Ef: 5-26-69

8718

NORMAN EARLS,
Plaintiff,
vs.
(HERMAN TATE) and ALEXANDER TATE,
Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

SUMMONS AND COMPLAINT

Serve upon Alexander
Tate at 509 Hurricane
Bd., Bay Minette, Alabama
Serve upon Herman Tate
at Foley, Alabama.

FILED

CHASON, STONE & CHASON
ATTORNEYS AT LAW
P. O. Box 120
BAY MINETTE, ALABAMA

9372191

CLERK
REGISTER

Received 26 day of May 1969
and
I served a copy of the within on Herman Tate
on Herman Tate at the home
By service on _____
TAYLOR WILKINS, Sheriff
By W. D. Wilk
SHERIFF
Sheriff claims 4 miles at
Ten Cents per mile Total \$.40
TAYLOR WILKINS, Sheriff
BY Solbert
DEPUTY SHERIFF

13 June 1969
Chason
Chason

Herman Tate

STATE OF ALABAMA

IN THE CIRCUIT COURT - LAW SIDE

BALDWIN COUNTY

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You are hereby commanded to summon Herman Tate and Alexander Tate 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 same, then and there to answer the Complaint of Norman Earls.

Witness my hand this 26 day of May,
1969.

Beice J. Pasch
Clerk

NORMAN EARLS,

X

IN THE CIRCUIT COURT OF

Plaintiff,

X

vs.

X

BALDWIN COUNTY, ALABAMA

HERMAN TATE and
ALEXANDER TATE,

X

AT LAW

Defendants.

X

X

8718

The Plaintiff claims of the Defendants the sum of Four Hundred Dollars (\$400.00) as damages for that heretofore on to-wit, the 14th day of January, 1969, at a point on Daphne Road in the City of Bay Minette, Baldwin County, Alabama, the Defendant Alexander Tate, who was then and there the agent, servant or employee of the Defendant Herman Tate, and at said time and place acting within the line and scope of his authority as such agent, servant or employee, did so negligently operate a motor vehicle as to cause or allow the same to run into, upon or against a motor vehicle owned by the Plaintiff and as a proximate result of said negligence

of the Defendant the said motor vehicle of the Plaintiff was damaged in that its rear bumper, bumper guard and bumper supports together with the rear body panel, deck lid and trunk floor were all bent, damaged or broken to the damage of the Plaintiff in the sum above mentioned, hence this suit.

CHASON, STONE & CHASON

By: John E. Chason
Attorneys for Plaintiff

COMMONS AND COMPLAINT

VT. PVA

RAYMOND COUNTY, VERMONT
IN THE CIRCUIT COURT OF

Defendants:

HERMAN TATE and ALEXANDER TATE,

as.

Plaintiff,

NORMAN EAKES,

FILED

MAY 23 1969

ALICE J. BUCK CLERK
REGISTER

NORMAN EARLS,

Plaintiff,

vs.

HERMAN TATE and ALEXANDER TATE,

Defendants.

* * * * *

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

* * * * *

SUMMONS AND COMPLAINT

* * * * *

CHAYSON, STONE & CHAYSON

BY: *[Signature]*
Attorneys for Plaintiff

FILED

MAY 23 1969

CLERK OF DISTRICT COURT

and above mentioned, hence this suit.
all part, demanded or proper to the demands of the Plaintiff in the
connected with the rear body panel, back lid and trunk floor were
sued in that its rear bumper, bumper guard and bumper supports
of the defendant the said motor vehicle of the Plaintiff was dam-