

1572

You are hereby commanded to summons Gussie Dixon to appear and plead, answer or demur, within thirty (30) days from the service hereof, to the complaint filed in the Circuit Court of Baldwin County, Alabama, against Gussie Dixon, defendant, by J. H. Maynard, plaintiff.

Arif Hussain
Clerk

J. H. MAYNARD,) ()
Plaintiff,) ()
-vs-) ()
GUSSIE DIXON,) ()
Defendant.) ()

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

The plaintiff claims of the defendant, to-wit, Two Thousand Five Hundred Dollars (\$2,500.00) as damages for that on, to-wit, the 18th day of June, 1949, the defendant wilfully or wantonly drove an automobile which he was operating on and along Alabama Highway No. 3, at or near its intersection with Hoiles Street, which said highway at said point is a public highway in the Town of Robertsdale, County of Baldwin, State of Alabama, and which said street at said point is a public street in said Town of Robertsdale, County of Baldwin, State of Alabama, into, upon, over or against an automobile in which the plaintiff was riding at said time and place, and as a proximate consequence and result of such wilfulness and wantonness of the defendant at said time and place, the plaintiff received severe personal injuries in this, to-wit: He received severe abrasions, bruises and cuts on or about his body, and was made sick, sore and lame; he suffered great mental anguish and physical pain, for all of which said injuries and damages the plaintiff claims damages as aforesaid; hence this suit.

COUNT II

The plaintiff claims of the defendant, to-wit, Two Thousand Five Hundred Dollars (\$2,500.00) as damages for that on, to-wit, the 18th day of June, 1949, the defendant so negligently drove an automobile which he was operating on and along Alabama Highway No. 3, at or near its intersection with Hoiles Street, which said highway at said point is a public highway in the Town of Robertsdale, County of Baldwin, State of Alabama, and which said street at said point is a public street in the Town of Robertsdale, County of Baldwin, State of Alabama, as to cause the same to run into, upon, over or against an automobile in which the plaintiff was riding at said time and place, and as a proximate consequence and result of such negligence on the part of the defendant at said time and place, the plaintiff received severe personal injuries in this, to-wit: He received severe abrasions, bruises and cuts on or about his body, and was made sick, sore and lame; he suffered great mental anguish and physical pain, for all of which said injuries and damages the plaintiff claims damages as aforesaid; hence this suit.



Attorney for Plaintiff

Defendant's address is believed to be Robertsdale, Alabama.

Received in Sheriff's Office

19 day of *Sept* 19 *50*

YLOR WILKINS, Sheriff

mailed Oct-21-1950

of serving copy on

Gussie Dixon

Sheriff

Taylor Wilkins

By

William Steadman

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RECORDED

SUMMONS AND COMPLAINT

J. H. MAYNARD,

Plaintiff,

- vs -

GUSSIE DIXON,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

LAW SIDE

FILED

OCT 19 1950

CECILE F. BUCKSON, Clerk

ATTORNEY AT LAW

FOLEY, ALABAMA