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SUMMONS AND COMPLAINT

STATE OF ALABAMA)
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon A. G. ALLEGRI, JR., to appear within thirty days from the service of this writ in the Circuit Court to be held for the said Court at the place of holding the same, then and there to answer the complaint of CHARLIE KRUIZICK.

WITNESS my hand this 23 day of March, 1942.

R. S. Duck
Clerk

COMPLAINT

CHARLIE KRUIZICK,
Complainant }
-VS- }
A. G. ALLEGRI, JR.,
Defendant }

The Plaintiff claims of the Defendant the sum of FIVE HUNDRED DOLLARS as damages for that heretofore on, to-wit, September 11th, 1941, the Plaintiff's tractor was being operated along and upon a public highway in the State of Alabama, more particularly described as U. S. 90, one and one half mile north of the Town of Robertsedale, Alabama, where he had a right to be, and while said tractor was being operated and driven along said U. S. 90 an automobile which was being driven by the Defendant ran upon, over or against the tractor of the Plaintiff, causing great damage and injury to the Plaintiff's tractor; the rear wheel housing was completely bursted, the axel was sprung and the tire was damaged and other parts of Plaintiff's tractor were broken, bent, smashed or otherwise damaged and injured, all to the damage of the Plaintiff as aforesaid. The Plaintiff alleges that his said damages to his said tractor were approximately caused by the negligence of the Defendant, in that he negligently caused, allowed or permitted said automobile to run upon, over or against the tractor of the Plaintiff and as approximate consequence thereof, the Plaintiff's tractor was damaged and injured as aforesaid.

TWO: The Plaintiff claims of the Defendant FIVE HUNDRED DOLLARS for that on or about September 11th, 1941 the Plaintiff was driving along U. S. 90 on his tractor at a point about one and one half miles north of Robertsedale, Alabama and at said time and place the Defendant was driving his automobile along said highway carelessly and heedlessly in willful or wanton disregard of the rights of or safety of others, and with knowledge that he would very likely injure or damage the Plaintiff and his said

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tractor thereby. And as approximate consequence wantonly ran his automobile into collision or against the tractor of Plaintiff and against Plaintiff and approximately caused the following damage to same: the rear wheel housing was completely bursted, the axel was sprung and the tire was damaged and other parts of Plaintiff's tractor were broken, bent, smashed or otherwise damaged and injured, and in addition thereto the Plaintiff was thrown from the tractor, was cut and bruised about his shoulder and face and suffered severe shock as the result thereof.


Attorney for Plaintiff

Executed this 24th day of March 1943
by signing a copy of the within summons and complaint on
A. G. Allegri Jr.

W. R. Stuart
Attorney
for
A. G. Allegri Jr.
D. S.

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Charles Kruzick
Complainant

vs

A. G. Allegri, Jr.,
Defendant.

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