

1075

STATE OF ALABAMA  
BALDWIN COUNTY

IN THE CIRCUIT COURT-LAW SIDE.

TO ANY SHERIFF OF THE STATE OF ALABAMA:-

You are hereby commanded to summon George Langham to appear within thirty days from the service of this Writ in the Circuit Court to be held in this County at the place for holding the same then and there to answer the Complaint of Paul Childress.

Witness my hand this 17 day of July, 1947.

Alice J. Luck  
Clerk.

COMPLAINT

PAUL CHILDRESS,  
Plaintiff,  
-VS-  
GEORGE LANGHAM,  
Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,  
LAW SIDE.


COUNT ONE:

The Plaintiff claims of the Defendant Five Thousand Dollars (\$5,000.00) damages for that on to-wit: the 20th day of June, 1947, the Plaintiff was driving an automobile truck, the property of the Plaintiff, on or along U. S. Highway #90 in the Town of Loxley, in Baldwin County, Alabama, where he had a right to be and while so driving or operating his said automobile truck, the Defendant, George Langham, negligently drove an automobile truck into or against Plaintiff's automobile truck and as a proximate cause and consequence thereof Plaintiff was severely injured as follows: his right knee was badly injured, he received a severe lick on the head and he was injured internally and caused to suffer great mental and physical pain and Plaintiff's said automobile truck was damaged as follows: both front fenders, the bumper, radiator, steering gear and motor was badly damaged and

the Plaintiff was caused to lose the use of said automobile truck for one month all to the damages of the Plaintiff as aforementioned.

COUNT TWO:

The Plaintiff claims of the Defendant Five Thousand Dollars (\$5,000.00) damages for that on to-wit: the 20th day of June, 1947, the Plaintiff was driving an automobile truck, the property of the Plaintiff, on or along U. S. Highway #90 in the Town of Loxley, in Baldwin County, Alabama, where he had a right to be and while so driving or operating his said automobile truck, the Defendant, George Langham, willfully or wantonly drove an automobile truck into or against Plaintiff's automobile truck and as a proximate cause and consequence thereof Plaintiff was severely injured as follows: his right knee was badly injured, he received a severe lick on the head and he was injured internally and caused to suffer great mental and physical pain and Plaintiff's said automobile truck was damaged as follows: both front fenders, the bumper, radiator, steering gear and motor was badly damaged and the Plaintiff was caused to lose the use of said automobile truck for one month all to the damage of the Plaintiff as aforementioned.

  
Attorneys for Plaintiff.

Plaintiff demands a trial  
of this cause by a jury.

  
Attorneys for Plaintiff.

Received in Sheriff's Office  
this 17 day of July, 1947  
TAYLOR WILKINS, Sheriff

July 22 1947  
A copy of within Summons and  
on

George Langham

Taylor Wilkins Sheriff  
H. F. Hall Deputy Sheriff

SUMMONS AND COMPLAINT

PAUL CHILDRESS,  
Plaintiff,

VS

GEORGE LANGHAM,  
Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,  
LAW SIDE.

Filed July 17, 1947.

Alice J. Leuck  
Clerk.

LAW OFFICES  
HYBART & CHASON  
BAY MINETTE, ALABAMA