

STATE OF ALABAMA)
BALDWIN COUNTY)

1134

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU ARE COMMANDED to summon J. C. BYRD 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 W. D. Davis.

Witness my hand, this 12 day of January, 1948.

W. D. Davis
Clerk

W. D. DAVIS

PLAINTIFF

VS

J. C. BYRD

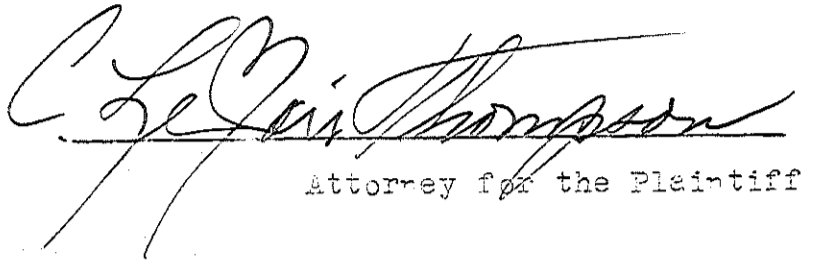
DEFENDANT

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

Count 1. The Plaintiff claims of the Defendant the sum of FOUR HUNDRED AND NO/100 DOLLARS (\$400.00) as damages for that on, to-wit: December 31, 1947, in Baldwin County, Alabama, plaintiff was driving his automobile upon a public highway, to-wit, U. S. Highway 31, near Stapleton Alabama at the Pines Filling Station and then and there the defendant negligently ran another automobile into, upon or against plaintiff's automobile, and thereby as the proximate result plaintiff's automobile was demolished, greatly damaged and rendered less valuable and the Plaintiff received bruises, contusions, lacerations and shock, and caused to lose time from his work, he was rendered less able to work, for all of which he claims damages as aforesaid.

Count 2. The plaintiff claims of the Defendant the sum of FOUR HUNDRED AND NO/100 DOLLARS (\$400.00) as damages for that on, to-wit: December 31, 1947, in Baldwin County, Alabama, plaintiff was driving his automobile upon a public highway, to-wit, U. S. Highway 31, near Stapleton Alabama, at the Pines Filling Station and then and there the Defendant being conscious at the time that his conduct in so doing would probably result in injury to the Plaintiff's said car and the occupants thereof, wilfully and wantonly ran another automobile into, upon or against the plaintiff's said automobile and thereby and as the proximate result and consequence thereof

the Plaintiff's automobile, was demolished, greatly damaged, and rendered less valuable, and the Plaintiff received bruises, contusions, lacerations and shock, and caused to lose time from his work, he was rendered less able to work, for all of which he claims damages as aforesaid.


Attorney for the Plaintiff

Received in Sheriff's Office
this 13 day of Jan, 1948
TAYLOR WILKINS, Sheriff

Presented Jan 22 1948
by serving copy of within Summons and
Complaint on

J. C. Byrd

Taylor Wilkins Sheriff
By Pete Sellers Deputy Sheriff

11-34

W. D. DAVIS

VS

J. C. BYRD

COMPLAINT

SUIT FOR DAMAGES

Filed
1-13-48
Alice J. Buck

From the Law Offices
of
C. LeNoir Thompson
ATTORNEY AT LAW
Bay Minette, Alabama