

1251

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Richard Whalley to appear within thirty (30) 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 Frank M. Taylor.

WITNESS MY HAND this 17th day of October, 1948.

Alice J. Leach  
Clerk of the Circuit Court.

: :

COMPLAINT.

FRANK M. TAYLOR,  
Plaintiff,  
VS.  
RICHARD WHALLEY,  
Defendant.

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

The Plaintiff claims of the Defendant, the sum of Five Hundred Dollars (\$500.00) damages for, that heretofore, on, to-wit: October 2, 1948, the Plaintiff was operating his automobile on United States Highway Number 31 at a point about 200 yards North of Stapleton in Baldwin County, Alabama, when the Defendant so negligently operated his motor vehicle that it was run into, upon or against the Plaintiff's automobile and as a proximate consequence of the Defendant's said negligence, the frame on the Plaintiff's automobile was bent, the gas tank bent, the rear of body was crushed and bent, rear cross member was bent, rear bumper broken, tail pipe bent and otherwise damaged all to Plaintiff's damage as aforesaid.

J. B. Blackburn  
Attorney for Plaintiff.

Plaintiff demands a trial of said cause by jury.

J. B. Blackburn  
Attorney for Plaintiff.

Received in Sheriff's Office  
this 7 day of Oct, 1948  
TAYLOR WILKINS, Sheriff

10/23/48  
RECEIVED  
10/23/48  
RETURNED  
Not found in my County after diligent search  
and inquiry  
W. J. COLEMAN, Sheriff  
BY *[Signature]* D.S.

334  
ORIGINAL  
SUMMONS & COMPLAINT.

FRANK M. TAYLOR,

Plaintiff

VS.

RICHARD WHALLEY,

Defendant.

RECORDED

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

FILED

OCT 24 1948

ALICE J. DUCK, Clerk

J. B. BLACKBURN  
ATTORNEY AT LAW  
BAY MINETTE, ALABAMA

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Richard Whalley to appear within thirty (30) 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 Frank M. Taylor.

WITNESS MY HAND this 1<sup>th</sup> day of October, 1948.

W. J. Duck

Clerk of the Circuit Court.

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COMPLAINT.

FRANK M. TAYLOR,

Plaintiff,

VS.

RICHARD WHALLEY,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

AT LAW.

The Plaintiff claims of the Defendant, the sum of Five Hundred Dollars (\$500.00) damages for, that heretofore, on, to-wit: October 2, 1948, the Plaintiff was operating his automobile on United States Highway Number 31 at a point about 200 yards North of Stapleton in Baldwin County, Alabama, when the Defendant so negligently operated his motor vehicle that it was run into, upon or against the Plaintiff's automobile and as a proximate consequence of the Defendant's said negligence, the frame on the Plaintiff's automobile was bent, the gas tank bent, the rear of body was crushed and bent, rear cross member was bent, rear bumper broken, tail pipe bent and otherwise damaged all to Plaintiff's damage as aforesaid.

J. B. Blachum

Attorney for Plaintiff.

Plaintiff demands a trial of said cause by jury.

J. B. Blachum

Attorney for Plaintiff.

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Richard Whalley to appear within thirty (30) 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 Frank M. Taylor. WITNESS MY HAND this 14th day of October, 1948.

*Wm. L. Duck*

Clerk of the Circuit Court.  
FILED  
OCT 14 1948  
ALICE L. DUCK, Clerk

COMPLAINT.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

AT LAW.

FRANK M. TAYLOR,  
Plaintiff,

vs.

RICHARD WHALLEY,  
Defendant.

The Plaintiff claims of the Defendant, the sum of Five Hundred Dollars (\$500.00) damages for, that heretofore, on, to-wit: October 2, 1948, the Plaintiff was operating his automobile on United States Highway Number 31 at a point about 200 yards North of Stapleton in Baldwin County, Alabama, when the Defendant so negligently operated his motor vehicle that it was run into, upon or against the Plaintiff's automobile and as a proximate consequence of the Defendant's said negligence, the frame on the Plaintiff's automobile was bent, the gas tank bent, the rear of body was crushed and bent, rear cross member was bent, rear bumper broken, tail pipe bent and otherwise damaged all to Plaintiff's damage as aforesaid.

*J. B. Thomas*  
Attorney for Plaintiff.

Plaintiff demands a trial of said cause by jury.

*J. B. Thomas*  
Attorney for Plaintiff.

ms 1267

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