

HENRY PIPKIN, JR.	)	
	)	IN THE CIRCUIT COURT OF
PLAINTIFF	)	BALDWIN COUNTY, ALABAMA
VS	)	AT LAW NO. <u>1619</u>
PHILLIP N. SCHOCK	)	
DEFENDANT	)	

COUNT ONE

Plaintiff claims of the Defendant the sum of \$5000.00 for that heretofore on, to-wit, March 3, 1950, Plaintiff was driving his Plymouth automobile in a northerly direction along Alabama Highway Number 104, at or near its intersection with Bell Forest Road, both of which are public highways or roads in the town limits of Daphne, Baldwin County, Alabama, and at said time and place the Defendant was driving his Chevrolet automobile southwardly along said Alabama Highway Number 104, carelessly and heedlessly in wilful or wanton disregard of the right or safety of others and with knowledge that he would very likely injure or damage the Plaintiff and his said automobile thereby and as a proximate consequence while attempting to cross said highway in front of Plaintiff's said automobile Defendant wantonly ran his said automobile into collision with Plaintiff's said automobile, and Plaintiff's body was bruised, contused and injured, his right knee was seriously bruised and injured and Plaintiff's said knee is permanently injured and Plaintiff was made liable for large doctor's bills. Plaintiff's automobile was greatly broken, bent, injured and damaged and Plaintiff was caused thereby to pay out or become liable for large sums of money for parts and repairs for his said automobile. Plaintiff avers that he received all of the said injuries and damages as a proximate result of Defendant's said wanton negligence.

COUNT TWO

Plaintiff claims of the Defendant the sum of \$5000.00 for that heretofore on, to-wit, March 3, 1950, Plaintiff was driving his Plymouth automobile in a northerly direction along Alabama Highway Number 104, at or near its intersection with Bell Forest Road, both of which are public highways or road in the town limits of Daphne, Baldwin County, Alabama, and at said time and place the Defendant so negligently operated his Chevrolet automobile southwardly on said Highway Number 104, attempting to cross said Highway in front of Plaintiff's said automobile, that as the proximate result of said negligence Defendant's automobile struck or collided with Plaintiff's said automobile, and Plaintiff's body was bruised, contused, and injured, his right knee was seriously bruised and injured and said knee is permanently injured and Plaintiff was made liable for large doctors bills. Plaintiff's said automobile was greatly broken, bent, injured and damaged, and Plaintiff was caused thereby to pay out or become liable for large sums of money for parts and repairs for his said automobile. Plaintiff avers that he received all of the said injuries and damages as a proximate result of Defendant's said negligence.

Defendant's Address:
Rural Route, Daphne, Alabama.

John Chason and
Winston L. Groom
Attorneys for Plaintiff

Plaintiff demands a trial by jury.

John Chason and Winston L. Groom
Attorneys for Plaintiff

CHASON & STONE

ATTORNEYS AT LAW
BAY MINETTE, ALABAMA

May 8, 1951

JOHN CHASON
NORBORNE C. STONE

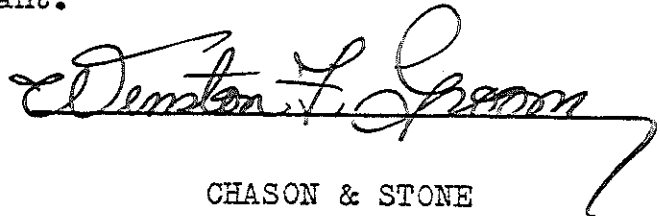
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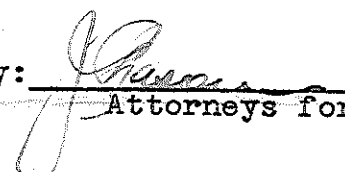
Mrs. Alice J. Duck
Clerk of the Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck:

Re: Henry Pipkin Jr.,
v. Phillip N. Schock

We have settled the above case and this is to authorize you to dismiss such case if and when the court costs are paid by the defendant in the above styled cause. If such costs are not paid promptly, will you please advise us the amount of such costs in order that we may contact the attorney for the defendant.


CHASON & STONE

By: 

Attorneys for Plaintiff.

FILED

JUN 6 1951

ALICE A. DICK, Clerk

RECEIVED
JUN 6 1951
U.S. DEPT. OF JUSTICE

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 1619

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

PHILLIP N. SCHOCK

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

PHILLIP N. SCHOCK

, Defendant

by HENRY PIPKIN, JR.

, Plaintiff

Witness my hand this 1st day of March 1951

Archie J. Duck

, Clerk

RECORDED
INDEXED

No. 1619

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

HENRY PIPKIN, JR.

Plaintiffs

vs.

PHILLIP N. SCHOCK

Defendants

SUMMONS and COMPLAINT

Filed March 1st, 1951

Wright, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

March 1, 1951

Taylor William, Sheriff

I have executed this summons

this 14 April, 1951

by leaving a copy with

Phillip N. Scheck

Taylor William, Sheriff

Phillip N. Scheck, Deputy Sheriff